



STEWARDSHIP PROGRAM PLAN FOR DESIGNATED CROP INPUT PACKAGING

Jurisdiction: Manitoba

Regulation: Packaging and Printed Paper Stewardship Regulation
195/2008

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List of key acronyms or abbreviations

AWSA – Agricultural Warehousing and Standards Association
EPFCP – Empty pesticide and fertilizer container program
HS&E– Health, Safety & Environment
PSP – packaging and printed paper stewardship program
CIPRP – Crop Input Packaging Recovery Program
PRO – Producer Responsibility Organization
Steward – Steward of designated material
SPI – Seed, pesticide and inoculant

Key definitions

Definitions taken from Section 1(1) of the [Packaging and Printed Paper Stewardship Regulation, 195/2008](#)

- Designated materials - a material designated in Section 2.
Excerpt from Section 2:
The following are designated as designated material for the purposes of the Act:
(a) packaging, but not including containers for which a refundable deposit is payable when the goods are supplied at retail and the packaging of those containers; (b) printed paper.
- Packaging and printed paper stewardship program - a waste reduction and prevention program for waste packaging and printed paper approved under section 6.
- Steward of designated material
(a) the first person who, in the course of business or a prescribed activity in Manitoba, supplies a designated material to another person; or
(b) a person who, in the course of business or a prescribed activity in Manitoba, uses a designated material obtained in a supply transaction outside of Manitoba.
- The Regulation – Packaging and Printed Paper Stewardship Regulation, 195/2008

Items managed by the Crop Input Packaging Recovery Program

- Containers (23L and under) – Containers (usually 10L in size), also known as jugs, that held commercial class pesticides and fertilizers.
- Totes and drums – Containers (23L and over), also known as non-deposit, bulk containers, that held commercial class pesticides and fertilizers also known as non-deposit, bulk containers.
- SPI bags – Bags that held seed, pesticide or inoculant.

Other

- Member – A steward of designated materials that subscribes to a packaging and printed paper stewardship program via Cleanfarms.

1. Executive Summary

Manitoba's farming community is committed to end-of-life stewardship of the packaging that is used to bring crop inputs to farms.

In 1989, farmers began recycling their empty pesticide containers/jugs through a voluntary, industry-funded program. In 2010, Cleanfarms was formed to deliver the pesticide sector's end of life stewardship programs and explore related programming for other types of packaging used in the ag sector.

Between 2011 and 2018, Cleanfarms operated an empty pesticide container recycling program under an approved stewardship plan pursuant to the Packaging and Printed Paper Stewardship Regulation, 195/2008 (The Regulation) issued under The Waste Reduction and Prevention Act (C.C.S.M. c. W40).

Around 2013, Cleanfarms began working more closely with the fertilizer sector to ensure that farmers could recycle their empty fertilizer containers via existing Cleanfarms programs. Cleanfarms now operates an empty pesticide and fertilizer container recycling program (EPFCP) under an approved stewardship plan pursuant to the Regulation, which expires on June 30, 2023.

In addition to operating the EPFCP, Cleanfarms and its members have started to deliver additional voluntary programs in partnership with Manitoba ag-retailers. These programs provide safe management or recycling options for totes and drums and seed, pesticide and inoculant bags once they have been used on farms.

In 2022, Cleanfarms started to work with partners to gradually transition the collection sites that collect containers (23L and under) from municipal sites to ag-retail locations.

This document captures these changes and outlines how Cleanfarms plans to roll out a new PSP, named the Crop Input Packaging Recovery Program (CIPRP) to reflect the wider range of packaging that can be recovered in Manitoba.

Upon approval, stewards can subscribe to Cleanfarms' government approved program to meet the requirements of The Regulation.

Version control:

- This document is Version 02 and captures feedback received through Cleanfarms' public consultation period (December 9, 2022, to January 25, 2023).

1.1. Program changes

The CIPRP introduces two key changes to:

- the number of designated materials captured
- the collection network for containers (23L and under)

These changes will help:

- put administration in place to ensure long-term program delivery
- provide farmers with a single collection point for all designated materials that form the CIPRP
- align Manitoba's collection model with neighbouring jurisdictions, which allows for the harmonization of logistics and communications across prairie provinces
- transition the program further towards a 100% industry-funded model

The tables that follow outline the program's history and how these changes will impact the program's administrative and collection models.

1.1.1. Program administration/financing

	Containers (23L and under)		Totes & drums (23L and over)		Bags
	Pesticide	Fertilizer	Pesticide	Fertilizer	SPI
1989 – 2010	Voluntary				
2011	Approved Stewardship Plan	None			
2012			None		
2013		Voluntary			
2014				None	None
2015					
2016					
2017	Approved Stewardship Plan		Voluntary	Opt-in	Pilot
2018					
2019					
2020					
2021					
2022					
2023 June					Voluntary
2023 July	Stewardship Plan (CIPRP) Submitted for approval: 2023-01-31				
2024					
2025					
2026					
2027					
2028					

Different forms of program financing & material designation

- Voluntary – Financed via voluntary, industry-wide funding; items are not designated materials
- Approved Stewardship Plan - Financed via industry-wide funding; items are designated materials
- Opt-in – Financed via select stewards; items are not designated materials
- Pilot – Preliminary phase of program development; items are not designated materials

Key change

Items that are currently managed through voluntary programs will become designated materials.

Rationale

Most stewards are already voluntarily financing collection programs for totes & drums and bags. Designating these items under the CIPRP helps ensure ongoing support for these programs.

Impact

Because most stewards are already Cleanfarms members, this will have a medium impact on stewards. Cleanfarms is proposing a six-month lead time to onboard stewards that are not presently Cleanfarms members.

1.1.2. Collection network

	Containers (23L and under)		Totes & drums (23L and over)		Bags
	Pesticide	Fertilizer	Pesticide	Fertilizer	SPI
1989 – 2010	Municipal	N/A	N/A	N/A	N/A
2011		N/A	N/A	N/A	N/A
2012		N/A	N/A	N/A	N/A
2013		N/A	N/A	N/A	N/A
2014		N/A	N/A	N/A	N/A
2015		N/A	N/A	N/A	N/A
2016		N/A	N/A	N/A	N/A
2017		N/A	N/A	N/A	N/A
2018		N/A	N/A	N/A	N/A
2019		N/A	N/A	N/A	N/A
2020	Hybrid model: municipal & ag-retail	Municipal	Ag-retail	Ag-retail	Ag-retail
2021					
2022					
2023					
2024					
2025	Ag-retail (preferred) + Municipal	Ag-retail (preferred) + Municipal	Ag-retail	Ag-retail	Ag-retail
2026					
2027					
2028					

Key change

The collection locations for containers (23L and under) are transitioning away from municipal to ag-retail locations. A hybrid model will be in place from 2023 to 2025 (and potentially longer). Cleanfarms anticipates that, eventually, ag-retailers will make up the bulk of collection sites for containers (23L and under) with some municipal sites continuing with collections.

Rationale

In all regions except for Alberta and Manitoba, Cleanfarms primarily works with ag-retailers to collect containers (23L and under). Working with ag-retailers generally improves metrics such as:

- Collection rates: Farmers generally feel that ag-retail-based collection sites are more accessible and convenient.
- Rinse rates: Staff working at ag-retailers have better knowledge about the contents of designated materials and closer relationships with their clients. This may translate into better preparation of designated materials.
- Health & Safety: A recycling bag model is used, and storage (at collection sites) is typically indoors which provides additional containment. Pickups are also scheduled more frequently which reduces the time the designated materials are onsite.

Impact

- With different drop off locations and the use of a new layer of containment (recycling bags), farmers will be asked to incorporate new habits.
- Many municipal collection sites will gradually transition away from acting as collection sites. They will no longer be responsible for the upkeep of collection sites.
- Ag-retailers, who are currently accepting totes and drums and bags, will gradually begin collecting containers (23L and under) as well.

2. Program synopsis

This section provides a high-level summary of how the CIPRP will operate.

Designated materials

The following designated materials can be recovered through the CIPRP:

Crop input	Packaging type	Size
Pesticide	Containers or jugs	23L and under
	Totes and drums	23L and over
	Bags	All
Fertilizer	Containers, pails or jugs	23L and under
	Totes and drums	23L and over
Seed	Bags	All
Inoculant	Bags	All

Collection system

Farmers will prepare the designated materials on the farm and bring them to a collection site. There are no user fees at the collection site. Cleanfarms then arranges for the pickup, transportation, and recycling/processing of the designated materials.

Shared responsibility

The CIPRP is based on a shared responsibility model where stewards, consumers (farmers/producers), and government all have a role to play.

- Stewards are responsible for providing a collection and recovery program that will manage all designated materials.
- Stewards are responsible for reporting data on designated materials to Cleanfarms and for remitting the funds to Cleanfarms to cover all aspects of the program.
- Consumers, in this case, farmers/producers, are responsible for preparing and dropping off their designated materials at a designated collection site.
- Cleanfarms (the Producer Responsibility Organization) is responsible for ensuring the items will be recycled or managed responsibly in accordance with the pollution prevention hierarchy and to ensure no unacceptable health and safety risk.
- Government is responsible for approving the CIPRP and managing compliance and enforcement.

Program financing

Like many Manitoba stewardship programs, the CIPRP is funded through a levy that is applied to designated materials.

Key dates

The following dates are relevant to the consultation process:

- One-on-one meetings discussions with key stakeholders – January 2022 to January 2023
- Release of stewardship draft program plan to stakeholders – December 9, 2022
- Draft stewardship program plan available for comment – December 9, 2022 – January 25, 2023
- Submission of stewardship program plan to government – January 31, 2023
- Program approval – June 30, 2023 (TBD)
- Levy start date for new members – January 1, 2024

Harmonization – working towards a Prairie-wide approach

Harmonization is a key priority for stewards because the majority of stewards supply designated materials across the Prairies.

Harmonization is especially important in Manitoba because relatively small amounts of designated materials are used. To operate efficient programs, Cleanfarms prioritizes harmonization in order to take advantage of economies of scale.

3. Organizational structure

This section outlines how stewards will be represented through Cleanfarms and can provide feedback into the organization. It also outlines how affected stakeholders will be able to provide input as well.

3.1. *Cleanfarms*

Cleanfarms is a not-for-profit industry stewardship organization that operates under Canada's Not-for-profit Corporation's Act. In some regions like Manitoba, Cleanfarms is referred to as a Producer Responsibility Organization (PRO).

Cleanfarms is governed by a private-sector Board. Membership in Cleanfarms is open to companies whose products or packaging fall under the industry-funded programs the organization operates. Annual Reports are available at www.cleanfarms.ca.

Cleanfarms operates another approved program in Manitoba, the [Stewardship Program Plan for Designated Ag Plastics](#).

3.2. *Steward of Designated Material*

The Regulation states that a "steward of designated material" means:

- (a) The first person who, in the course of business in Manitoba, supplies a designated material to another person; or
- (b) A person who, in the course of business in Manitoba, uses a designated material obtained in a supply transaction outside of Manitoba.

Cleanfarms programs allow stewards to meet regulatory requirements in multiple jurisdictions. Regulations in different jurisdictions use different terminologies to identify the party that takes on the regulatory requirements. The terms 'first seller' (Saskatchewan), 'brand owner' (Prince Edward Island), and 'enterprise' (Quebec) have very similar meanings to the term 'steward.'

Cleanfarms uses the term 'member' to identify a brand owner/first seller/steward of designated material/enterprise that is subscribed to a Cleanfarms program.

3.3. *Cleanfarms' Governance model*

3.3.1. *Board*

The Cleanfarms Board provides overall strategic direction to the organization and its activities consistent with its mission and Articles of Incorporation. The Board approves the organization's annual budget, financial statements, and business plan.

A listing of Board members is available at <https://cleanfarms.ca/staff-board/>.

3.3.2. *Manitoba Advisory Committee*

A Manitoba-based advisory committee is in place to provide feedback into Cleanfarms' Stewardship Program Plan for Designated Ag Plastics. The scope of this committee will be expanded to provide feedback and advice into the CIPRP.

This advisory committee will help ensure that the resulting programming meets the needs of and provides value to the various stakeholders who play a role in it. This is especially important as the program is undergoing some changes to its collection network.

It is expected that membership will include representatives of the provincial government, rural and municipal associations, ag-retailers and farmer/producer groups.

3.3.3. *Staff*

Cleanfarms staff are responsible for day-to-day operations of the program.

- Cleanfarms has an office in Manitoba and a program coordinator that is responsible for supporting collection site operations in Manitoba.
- Additional support such as end market development, health, safety and environment monitoring, communications, administration and finance services are available through Cleanfarms' national network which includes an Ontario-based head office and regional offices. This allows stewards to efficiently use the resources that Cleanfarms already has in place.

3.3.4. *Additional governance documents*

Over its 10-plus years of existence, Cleanfarms has developed a comprehensive and well-documented set of governance and code of conduct policies. In the summer of 2022, Cleanfarms' governance documents underwent a thorough legal review.

The following documents (most are available at <https://cleanfarms.ca/join-cleanfarms/>) outline Cleanfarms' governance and the expectations of staff, members and contractors:

- By-laws
- Code of Conduct
- Board approved policies – available to members. These are available to outside stakeholders on demand and cover the following: board-management delegation, executive limitations, governance process and operations policies.
- Membership agreement

3.4. *Guiding Principles*

The following are key factors that guide Cleanfarms' work, both in relation to the CIPRP and in all other aspects of the organization.

- The program must be operated in a manner that ensures there is no unacceptable health and safety risk.
- The program must be managed by the manufacturers/brand owners of the products.
- The program must strive to achieve the highest and most practical end use of products while following the 4Rs (reduce, reuse, recycle, recover) hierarchy.
- The program must achieve reasonable, high participation rates. While they may never actually achieve this goal for practical reasons, programs should still strive towards 100 percent recovery.
- The program must provide reasonable accessibility for all users of the products to facilitate and promote their full participation in the program.
- The program must strongly encourage participation by all manufacturers/brand owners/stewards.
- The program should be designed in a way that promotes harmonization across different regions or provinces.

4. Designated materials - Description of packaging targeted by the program

4.1.1. Containers (23L and under)

Designated material [composition]	Definition	Also known as	Exclusions
Pesticide containers [HDPE]	Containers, usually 10L in size, that contained commercial-class pesticides. Commercial-class pesticides are pesticides classified and labeled as 'commercial' pesticides as defined under the Pest Management Regulatory Agency's Pest Control Products Act. ¹	<ul style="list-style-type: none"> • Pesticide jugs • Chemical jugs • Pesticide containers (23L and under) 	<ul style="list-style-type: none"> • Containers used for home and garden care with the words 'Domestic' on their label • Bags or plastic bottles/jugs that contained fertilizers destined for homeowners • Mineral tubs • Peripheral materials²
Fertilizer containers [HDPE]	Bags that contained granular fertilizer destined for agricultural use. Fertilizers are defined as "any substance or mixture of substances, containing nitrogen, phosphorus, potassium or other plant food, manufactured, sold or represented for use as a plant nutrient" under the Canadian Food Inspection Agency's Fertilizers Act; and/or a fertilizer product with a nutrient analysis claim or guarantee. This includes micronutrients, supplements, low analysis farm fertilizer, biofertilizers, inoculants and mycorrhizal.	<ul style="list-style-type: none"> • Fertilizer pails • Fertilizer jugs • Fertilizer containers (23L and under) 	

¹ The vast majority of commercial-class pesticides are used for agricultural purposes. They are also used in the public health, golf course, insect control, structural pesticide management and forestry sectors. All commercial-class pesticide containers and bags are accepted through the CIPRP.

² There are other sources of packaging that sometimes accompany containers. This includes caps, labels, booklets (generally affixed to pesticide containers only), metal handles (sometimes affixed to fertilizer containers only) and corrugated cardboard. These are excluded from the CIPRP.

4.1.2. Totes and drums (23L and over)

Designated material [composition]	Definition	Also known as	Exclusions
Pesticide totes and drums [HDPE]	Containers, greater than 23L in size, that contained commercial-class pesticides using the definition noted previously in this section.	<ul style="list-style-type: none"> • One-way, bulk containers • Bulk containers • Intermediate bulk containers (IBCs) 	<ul style="list-style-type: none"> • Any pesticide and fertilizer container that has a deposit applied to it.
Fertilizer totes and drums [HDPE]	Containers, greater than 23L in size, that contained commercial-class pesticides using the definition noted previously in this section.		

4.1.3. Bags (all sizes)

Designated material [composition]	Definition	Also known as	Exclusions
Seed bags [LDPE or PP bags, and paper bags, whether lined with plastic or other material]	<p>Bags that contained agricultural seed.</p> <p>Agricultural seed is used for agricultural purposes and includes the following types of seed: corn, canola, soybeans, all cereals, forages; and cover crops. This excludes seed used for landscaping (e.g., grass seed).</p>	<ul style="list-style-type: none"> • Mini bulk bags • Seed tote bags • FIBCs 	<ul style="list-style-type: none"> • Seed potato bags • Bags that contained domestic-class pesticides. • Bags used for animal supplements
Pesticide bags [LDPE or PP bags, and paper bags, whether lined with plastic or other material]	Bags that contained commercial-class pesticides using the definition noted previously in this section.	<ul style="list-style-type: none"> • Pesticide bags • Pesticide tote bags • FIBCs 	<ul style="list-style-type: none"> • Reusable bulk totes • Feed bags
Inoculant bags [LDPE or PP bags, and paper bags, whether lined with plastic or other material]	<p>Bags that contained inoculant.</p> <p>An inoculant is a type of bacteria that is used to help seed start producing root nodules and grow nitrogen fixing bacteria. Inoculant can be a liquid, granular or powder formulation.</p>	<ul style="list-style-type: none"> • Inoculant bags • Mini bulk bags • Inoculant tote bags • FIBCs 	

5. Program details

5.1. Summary – changes to the collection system (2023 – 2028)

This section details how designated materials are currently managed and what changes are anticipated through the duration of the CIPRP. **Changes are noted in purple.**

Designated material	Collection site type (municipal vs. ag-retail)	On farm preparation	End of life management & (end use product)
Containers (23L and under)	1989 – 2022: Municipal 2022 – 2025: Hybrid model ³ , both municipal & ag-retail 2025 – 2028: Ag-retail (preferred) or municipal	- Triple or pressure rinse, remove cap & booklet - Place containers in a recycling bag and securely close ⁴ . (This change started in 2021)	Recycling (Agricultural fence posts, composite dimensional lumber used in industrial construction, plastic pallets, drainage tile, guard rails, and parking lot curb stops)
Totes and Drums (23L and over)	2015 – 2028 : Ag-retail	- Rinse - If rinsing is not possible, ensure that bungs and enclosures are in place	Recycling (Plastic pallets, drainage tile, composite dimensional lumber used in industrial construction, and specialty parts for various industries)
SPI bags	2019 – 2028 : Ag-retail	- Place empty bags (up to 100 kg in size) in plastic recycling bags, which are tied with rope/twine. - Bundle larger (greater than 100 kg, usually 500 kg or 1,000 kg) bags in packages of six.	Waste-to-energy (Energy) Recycling end markets are developing for some LDPE and PP bags.

³ Cleanfarms is presently working one-on-one with municipal collection sites and ag-retailers to eventually transition the collection of containers (23L and under) away from municipalities and to ag-retailers. Cleanfarms' long-term, aspirational goal is to primarily use ag-retailers as collection sites. Municipal collection sites that wish to continue to collect small containers can do so and will continue to receive service via Cleanfarms. See Appendix A for a fulsome outline of proposed processes. Appendix B provides recommended phase out dates (which are guidelines only). Appendix C also provides some communication tools used to share this information.

Important notes about this transition:

- Each community is evaluated/examined on a case-by-case basis.
- The closure of municipal collection sites is done in coordination with the opening of a new ag-retail collection.
- Cleanfarms is offering on-farm pickup to large volume users in conjunction with this change.
- Cleanfarms is working closely with provincial government officials around licensing requirements for new and current/former collection sites.

⁴ Recycling bags are a 3.5 mil thick plastic bag that generally holds 40-45 containers (23L and under). They provide an extra layer of containment and help keep collection sites cleaner.

5.2. Program details

Farmers prepare their materials on farm before dropping them off at a designated collection site. Collection sites are responsible for ensuring that materials are prepared properly and temporarily stored in accordance with relevant HS&E standards. Cleanfarms arranges for the recycling or end-of-life management of the designated materials.

5.2.1. On-farm preparation

Farmers will properly prepare items prior to drop off.

- Containers (23L and under), excluding seed treatment containers (see section 5.2.7), will be triple or pressure rinsed, with the cap and booklet removed. They will then be placed into recycling bags and secured.
- Totes and drums, excluding seed treatment totes and drums (see section 5.2.7) will be, where possible, emptied and rinsed to ensure that no more than 1 inch of product remains. If the container is not rinsed, farmers will ensure that bungs and enclosures are in place.
- SPI bag preparation differs by size. Small bags (up to 100 kg in size) will be placed in plastic recycling bags, which are tied with rope/twine. Larger (greater than 100 kg, usually 500 kg or 1,000 kg) bags will be bundled in packages of six.

5.2.2. Collection system

Cleanfarms does not own or manage collection sites. Cleanfarms partners with interested organizations to provide collection services.

5.2.2.1. Current number of collection sites for small containers

Program	Total	Breakdown by type	
		Municipal	Ag-retail
Containers (23L and under)	160	120	40
Totes and drums (23L and over)	120	0	120
SPI bags	120	0	120

**Approximate numbers as of January 30, 2023; numbers rounded*

See Appendix B for a list of collection sites.

5.2.2.2. Key collection site responsibilities

Collection sites are responsible for monitoring drop off procedures and temporarily storing designated materials in a way that ensures high health, safety and environmental practices are in place.

Collection sites will:

- Make staff available to inspect items at drop off to make sure that they are properly prepared.
- Use promotion & education materials (supplied by Cleanfarms).
- Provide farmers with plastic recycling bags (provided by Cleanfarms).
- Store designated materials in a way to ensure safe and secure containment and prevent unauthorized removal.
- Use Cleanfarms' online pickup request system to notify Cleanfarms when a pickup⁵ is required.

⁵ Collection sites are asked to request a pickup once they have accumulated 10 full recycling bags of containers (23L and under), 25 totes and drums or 10 full recycling bags of SPI bags.

- Maintain Agrichemical Warehousing Standards Association (AWSA) certification⁶. (See Section 5.2.6.1.)
- Maintain other appropriate licensing as required in Manitoba.

5.2.2.3. *Collection site compensation*

Collection sites are currently not compensated for their role in the collection of these items. This is due to the voluntary history of current programs and the sector's longstanding commitment to good stewardship. This arrangement is expected to continue.

5.2.3. *Transportation of designated materials.*

The following process is in place:

- Cleanfarms uses an online system that allows collection sites to request pickups.
- When a pickup request is received, Cleanfarms arranges for a contractor to pick up and transport the designated materials to a processor.
- Pickups generally take place from April to November of each year and are weather dependent.

5.2.3.1. *TDG protocols for totes and drums*

The transportation of some drums and totes is subject to requirements under Transport Canada's Transportation of Dangerous Goods (TDG) Act. Cleanfarms online system stores the appropriate information and creates all the necessary paperwork to ensure that the requirements are followed.

5.2.4. *Processing of designated materials.*

5.2.4.1. *Containers (23L and under)*

Paper labels are removed from the containers. The containers are shredded and put through a wash line for additional cleaning. The clean shred is stored prior to being shipped to a pre-approved recycling facility.

5.2.4.2. *Totes and drums*

Bungs, caps, enclosures and any non-plastic components are removed. The containers are cleaned, shredded, and the clean shred is stored until it is sent to an approved recycling facility for remanufacturing into new products.

5.2.4.3. *SPI bags*

Empty bags are transported to a facility where they are baled and then transported to a waste to energy facility (small bags) or pre-approved recycler (big bags)

5.2.5. *End of life management of designated materials*

Cleanfarms uses a solutions-based approach that relies on sound environmental stewardship principles following the 4Rs hierarchy of Reduce, Reuse, Recycle and Recover.

The primary goal is to recycle material into marketable end-use products rather than other disposal practices like high temperature incineration or energy recovery. Cleanfarms only uses pre-approved recyclers and processors, all located within North America.

⁶ In the event that a collection site only collects seed bags (and no other designated materials), AWSA certification is not required.

5.2.5.1. *Containers (23L and under)*

The vast majority of plastic is sent to a pre-approved recycling facility in North Carolina or Quebec.

In the unlikely event of a recycling market shortage, Cleanfarms would consider energy recovery as the next best alternative.

5.2.5.2. *Totes and drums*

The vast majority of plastic is sent to a pre-approved recycling facility in North Carolina.

In the unlikely event of a recycling market shortage, Cleanfarms would consider energy recovery as the next best alternative.

5.2.5.3. *SPI bags*

Recycling options for SPI bags are not consistently available.

Since the beginning of the pilot in 2019, some big bags have been sent to a recycler in British Columbia. The majority of bags have been sent to a pre-approved waste-to-energy facility in Calgary.

Note: end of life management for SPI bags is expected to change through the duration of the CIPRP. Recycling end markets are expected to develop and become more stable.

5.2.6. *Quality control and assurance*

This section summarizes the standards and protocols that are already in place and that will continue throughout the duration of the CIPRP.

5.2.6.1. *Collection site standards*

All ag-retailers must be AWSA certified warehouses. This means that the facility has high health, safety and environmental standards in place surrounding construction and structural requirements, employee training and documentation. These standards are verified every two years by an independent, third-party auditor. (Without this certification, the facility is prohibited from storing commercial-class pesticides.) For more information about AWSA standards, please visit <https://awsa.ca/>.

As Cleanfarms transitions from municipal to ag-retail collection sites, AWSA certification will automatically mean that high health, safety, and environmental standards are in place. This certification ensures that staff is properly trained to handle designated materials.

5.2.6.2. *Handling standards*

Handling procedures are in place for the protection of workers who handle designated materials during transportation or processing. A document entitled 'Best Practices for Protecting Health & Safety of Workers and the Environment' (Appendix C) is attached to all contracts with contractors (i.e., entities that transport containers) and processors (i.e., recyclers).

5.2.6.3. *Rinse rate monitoring (containers, 23L and under only)*

Containers (23L and under) are triple or pressure rinsed by users prior to their return to collection sites. To monitor adherence to triple or pressure rinsing, Cleanfarms measures 'rinse rates' (the percentage of containers that are collected that have been triple rinsed, pressure rinsed) every two years.

5.2.6.4. *Plastic quality standards (containers, all sizes)*

Cleanfarms regularly tests the plastic that it collects to ensure that it does not meet the criteria of 'hazardous recyclable material' as defined in the *Cross-Border Movement of Hazardous Waste and*

*Hazardous Recyclable Material Regulations (XBR) or the Export and Import of Hazardous Waste and Hazardous Recyclable Material Regulations*⁷. This means that the plastic shred is considered non-hazardous.

5.2.6.5. *Field contractor compliance reviews – all designated materials.*

Cleanfarms reviews a contractor's adherence to health, safety and environmental control standards (Appendix C) annually.

Some of the key things that are verified by an independent third party include:

- Completion of depot inspections by the contractor as per a prescribed checklist;
- The existence of documented procedures for those activities relating to handling designated materials; and,
- Evidence of the completion of annual training or testing.

5.2.6.6. *End product manufacturer reviews*

Cleanfarms reviews health, safety and environmental controls employed by end product manufacturers (who use plastics generated from containers (23L and under) and totes and drums) and conducts periodic audits to ensure adherence to health, safety and environmental control standards.

Some of the key things that are verified include:

- The existence of written procedures for handling containers;
- Evidence that employees handling containers have received adequate training; and,
- Evidence that materials processed have been sold for end uses approved by Cleanfarms.

5.2.6.7. *End use product testing and use restrictions (containers, all sizes)*

Cleanfarms limits the use of plastic collected to end products that have limited human contact.

Cleanfarms periodically tests these end products for 19 pesticide residuals to ensure no unsafe levels of pesticides leach into the environment from the use of these products. The Canadian Water Quality Guidelines are used as the basis for this testing.

5.2.7. *Seed treatment containers*

One particular pesticide product, seed treatment, requires different handling. Seed treatment is a liquid that is very strongly coloured so that the seed it is applied to is easily identified. The product is very sticky and when the container is emptied, some product will stick to the wall of the container. These containers make up less than two percent of all containers put into the market.

Cleanfarms makes minor adjustments to its processes to efficiently manage these containers:

- On-farm preparation - These containers are not rinsed, and the cap is not removed. Once emptied, farmers put the cap back on the container. Sealed seed treatment containers are placed in a recycling bag that is designated for seed treatment containers only.
- Processing. The recycling bags that hold seed treatment containers are easily identifiable. They are separated from other containers because there is a distinct colour to them. This makes it easy for contractors to place these aside, separate from other recycling bags.
- End- of-life management – These containers are not recycled. They are sent for high-temperature incineration. This practice is accepted by the industry and used by other international container management programs.

⁷ The *Cross-Border Movement of Hazardous Waste and Hazardous Recyclable Material Regulations (XBR)* replaced the *Export and Import of Hazardous Waste and Hazardous Recyclable Material Regulations* in October 2021.

5.2.8. *Supporting municipal collection sites while collection site transitions are underway*

Previous sections have largely focused on how Cleanfarms will service ag-retail collection sites throughout the duration of the CIPRP.

Municipal collection sites will likely continue to collect containers (23L and under) from 2023 to 2025 as ag-retail collection sites in their areas start to collect containers (23L and under). Cleanfarms will continue to service municipal collection sites in the same manner that was done under the EPFCP. A contractor will visit municipal collection sites one to three times per year to collect containers on a pre-determined schedule.

This (the pickup of containers) will continue even after a municipal collection site closes in the event that users still drop off containers post closure.

5.2.9. *Servicing municipal collection sites that wish to continue to offer collections*

In some cases, municipal collection sites may wish to continue to collect containers (23L and under) beyond 2025 and throughout the duration of the CIPRP.

Municipal collection sites who wish to continue to offer collections for containers (23L and under) will be serviced using the same processes that will be put in place to service ag-retailers. Municipal collection sites will be asked to:

- Use promotion & education materials (supplied by Cleanfarms).
- Provide farmers with plastic recycling bags (provided by Cleanfarms).
- Accept containers in bagged format.⁸
- Store designated materials in a way to ensure safe and secure containment and prevent unauthorized removal.
- Use Cleanfarms' online pickup request system to notify Cleanfarms when a pickup is required.

5.2.10. *Servicing special user groups*

From time to time, Cleanfarms is asked how it works with special user groups, namely farmers in Northern and Remote regions, users within the City of Winnipeg who may use commercial class pesticides, and large volume users. These situations are largely managed on a case-by-case basis.

5.2.10.1. *Northern & Remote regions*

Farmers who use designated materials are located primarily in agriculturally-intensive areas and therefore collection sites are also predominantly located in agriculturally-intensive areas.

Currently, the only Northern and Remote community that may require access to collection services of designated materials is in the agriculturally-intensive region around The Pas.

Cleanfarms has had discussions with local stakeholders in the area to explore collections in this area. Based on these discussions, municipal-based infrastructure is not well suited. The transition of collection sites from municipal to ag-retail locations may work better for this region. This will be an area of focus through the duration of the CIPRP.

5.2.10.2. *Users within or close to the City of Winnipeg*

There are two distinct non-farming user groups that may use items that are designated materials under the CIPRP: golf courses and the City of Winnipeg's Insect Control Branch.

⁸ This is a change to the procedure that is currently in place (2018 to 2023) at municipal collection sites. This ensures extra containment at collection sites.

Cleanfarms has regular one-on-one discussions with these two user groups around accessibility. These two user groups were able to make use of municipal based collection sites through the duration of the EPFCP.

Cleanfarms anticipates that the transition of collection sites from municipal to ag-retail locations will increase convenience for these users because they will likely bring containers (23L and under) to the same place where they have purchased the product from. Suppliers are generally keen to accommodate their clients.

5.2.10.3. *On-farm/on-site collections to accommodate large volume users.*

Cleanfarms is currently piloting a 'Western Canada Large Volume Ag Plastics & Packaging Pickup' service.

To be eligible for this service, Manitoba growers/businesses must have (or be willing to accumulate) a minimum quantity of designated materials as detailed at www.cleanfarms.ca. The service is available to users free of charge as long as minimum volume requirements are met.

6. Program funding

This section details how the program is funded and incorporates accounting standards and financial best practices for PROs.

For each designated material, Cleanfarms calculates a levy that is applied to each designated material that a steward supplies into Manitoba. Levies are released in September for the following year. Stewards are responsible for remitting levies to Cleanfarms to cover the costs of the program.

Consistent with the requirements of the WRAP Act, the levy is not collected by the provincial government and is not a tax.

6.1. Levies at a glance

The table below identifies the 2023 levies that are in place for designated materials.

Designated material	Size & levy
Containers (23L and under)	
Seed treatment containers	≤ 1 L - \$0.095 1.1 L 23 L - \$0.95
Pesticide (non-seed treatment) containers	≤ 1 L - \$0.059 1.1 L 23 L - \$0.59
Fertilizer containers	
Totes and Drums (23L and over)	
Seed treatment totes and drums	23.1 - 225L - \$30.65 225.1 - 550L - \$44.54 > 550 L - \$55.14
Pesticide totes and drums	23.1 - 225L - \$20.43 225.1 - 550L - \$29.69 > 550 L - \$43.61
Fertilizer totes and drums	
SPI Bags	
Seed bags	Less than 30 kg - \$0.27
Pesticide bags	31 to 500 kg - \$1.40
Inoculant bags	501 to 1,000 kg - \$2.81

6.1.1. Start date for stewards (financial obligations)

The majority of stewards who supply pesticides, fertilizer and seed into Manitoba are already Cleanfarms members. They are supporting/financing programs for designated materials under the EPFCP and items that are currently managed on a voluntary basis. A member listing is available at www.cleanfarms.ca.

The expansion of the number of designated materials that are managed via the CIPRP will impact stewards who are not currently Cleanfarms members. To give these stewards time to adjust to new requirements, financial obligations for these stewards will begin on January 1, 2024.

6.2. Setting the levies

The Cleanfarms Board approves a yearly budget, which determines the levies.

The levy is calculated based on the following formula:

$$\frac{\text{Program Costs (A + B + C + D + E + F)} - \text{Recycling Revenue}}{\text{Number of units sold into the marketplace}}$$

6.2.1.1. *Program costs*

Program costs are currently categorized as follows:

- (A) Operations/direct costs - This typically includes recycling bags, processing, rinse rate testing, auditing, and transportation costs.
- (B) Operations/indirect costs - This captures education and promotion, legal, insurance, travel, meeting, annual regulatory and compliance review costs.
- (C) Program management - This captures staffing and shared costs (e.g., website, photocopier, telephone).
- (D) Program development - This often includes administrative costs related to recruiting stewards and start up duties. This will be minimal since existing programming is in place.
- (E) Contingency – This helps manage unknown costs and fluctuations in collection volumes.
- (F) Reserve fund development – These funds are allocated to cover the costs of winding down operations in the event this occurs (typically 50 to 150 per cent of operating costs).

6.2.1.2. *Recycling revenue*

For containers (23L and under) and Totes and Drums, revenue is usually generated from the sale of plastic to recycling end markets. Recycling markets have fluctuated significantly over the past five years and recycling revenue generated from containers ranges from \$44/tonne to \$770/tonne.

For bags, no revenue is generated because almost all bags are managed through a waste to energy facility.

6.2.1.2.1. *Number of units sold into the marketplace*

Stewards will report, in confidence, their sales figures, which include the weight of containers/bags and number of units delivered into the marketplace, to Cleanfarms on a yearly basis.

Members (who supply designated materials in multiple jurisdictions where Cleanfarms programs operate) currently provide Cleanfarms with Canada-wide data and not Manitoba-specific data.

This will continue under the CIPRP to reduce the administrative burden for stewards.

6.2.2. *Jurisdiction-wide levies to minimize administration for Stewards*

Most stewards that supply crop inputs into Manitoba also supply products in other jurisdictions where Cleanfarms programs are in place.

All program costs associated are calculated on a jurisdiction-wide basis and not a provincial basis. In other words, a Canada-wide levy is calculated for empty containers (23L and under) rather than a jurisdiction-specific levy for each jurisdiction where the program operates.

To minimize red tape for Stewards, this will continue under the CIPRP.

6.2.3. *Levies – integrated into the cost of the product*

Many stewards who are involved in government-approved programs that operate in Manitoba use a visible fee at the point of sale to incorporate a levy into the cost of a product.

To Cleanfarms' knowledge, its members do not do this. They do not display the levy that they remit to Cleanfarms as a visible fee at the point of sale. The levy is incorporated into the cost of the designated material.

Cleanfarms anticipates that this practice (not using visible fee) will continue and recommends this to its members. The final decision on point-of-sale fees rests with the steward.

6.3. *Steward compliance reviews*

A steward compliance review program will be used to ensure that stewards are reporting accurately. (Similar compliance review programs are already in place in other jurisdictions where Cleanfarms operates government-regulated programs.)

Some key aspects of the program may include:

- Stewards will typically be selected at random for compliance reviews. However, certain factors such as significant changes in reporting and compliance history may trigger a non-random compliance review.
- Stewards will be notified in writing that they have been selected for a compliance review and advised of the requirements of the process.
- Cleanfarms will use two types of compliance reviews:
 - Level 1 - a desktop audit or review of records and documentation that a Steward has provided to Cleanfarms.
 - Level 2 – In the event that a Level 1 review indicates inaccuracies, a more in-depth review will take place. A Level 2 audit is conducted onsite, at the Steward's office. It will likely include a review of data and reporting/record-keeping procedures, as well as interviews with staff or management.
In most cases, a Level 1 review is sufficient and effective in addressing member reporting and remittance errors or omissions.
- Findings will be reported (in confidence) to the Steward and Cleanfarms' finance staff. Corrective actions, as required, will be undertaken and in extreme cases may involve deregistration from the approved stewardship program, in which case the Steward may be subject to further penalties established and enforced by government regulators.

7. Steward onboarding process

This section outlines how Cleanfarms will onboard stewards, or companies that are obligated under CIPRP and who are not yet Cleanfarms members. The onboarding strategy is based on techniques used in other provinces and for other programs.

- **Company Identification** - Cleanfarms uses a variety of tools to identify (potential) stewards. This includes desktop research, outreach at farm shows and member referrals. Once Cleanfarms identifies a company as a potential steward, the steward is contacted in person, by phone or by email to better determine if the company meets the definition of a steward.

Cleanfarms attempts to identify a key individual within the company who is responsible for regulatory compliance or end of life stewardship. (In some cases, after learning more about a company, it may not meet the definition of a steward. Records and interactions are documented in the event that the company's product line or circumstances change.)

- **Education and awareness** - Cleanfarms emails the steward informing them of the benefits of Cleanfarms' programs and their obligations. A meeting by phone or in person is requested. Repeated attempts by phone or email are made to set up a meeting. These interactions are documented.

Cleanfarms will engage with the steward at least four times over 20 business days before the steward is internally identified as 'non-responsive'.

Please note: Cleanfarms has found that direct outreach outlining regulatory obligations from government officials to steward (e.g., in the form of a letter) is very effective. Upon approval of this PSP, Cleanfarms will ask the Department of Environment, Energy and Climate Action to send a letter to stewards advising stewards of their regulatory obligations and options.

- **Steward meeting** - Cleanfarms and the steward meet to review program benefits, pricing, key policies, and registration procedures. The steward is asked to register or sign up for membership.

Following the steward meeting, Cleanfarms will engage with the steward at least four times over 20 business days before the steward is classified as 'non-compliant'. These interactions are documented.

- **Outreach to the non-responsive and non-compliant owner** - A registered letter is sent to 'non-responsive' or 'non-compliant' stewards. The content of the letter varies depending on the individual circumstances and usually addresses a steward's regulatory obligation and how this can be met.
- **Ministerial engagement** - In the event that stewards are not responsive or non-compliant, Cleanfarms will engage with the appropriate ministry/department. Cleanfarms will provide ministry officials with documentation of interactions and steward contact information upon request.

8. Promotion & Education

Cleanfarms has a comprehensive and well-developed education and awareness approach that has been specifically developed to meet the needs of farmers, collection sites and additional stakeholders that are impacted by the CIPRP.

8.1. Areas of focus for 2023 - 2028

Cleanfarms will largely focus on the following goals:

- Create awareness of the CIPRP, in particular the new types of designated materials that are accepted, collection locations and proper preparation steps.
- Ensure collection sites (existing, potential and new) are well informed regarding proper preparation steps and changes to collection procedures so that they can provide accurate information to farmers.

Note: Promotions & education related to steward onboarding is noted in Section 7.

8.2. Sample communication tools

Research shows that farmers look to their ag-retailer, social media and trade publications (e.g., farm newspapers) as key sources of information about issues that can affect their farm operation. Cleanfarms makes use of these channels in addition to trade shows and meetings with associations/grower groups.

A sample of tools that have been used are available in Appendix D.

Farmer focused promotions & education tools usually include:

- Paid media – A variety of advertisements are used to increase awareness
- Earned media – News releases are used to raise awareness and highlight successes.
- Collection site signage
- Electronic tools – Web banners and other artwork is available on Cleanfarms' website and are often used by grower groups, collection sites and others to help promote awareness.
- Point of sale materials (posters, invoice stuffers) – These are available to ag-retailers to help raise awareness amongst customers.
- Website – This is the key tool that Cleanfarms uses to ensure a variety of stakeholders has access to information about the program.

Trade shows and industry meetings are extremely valuable because they allow for dialogue and one-on-one outreach.

Cleanfarms anticipates that trade shows/meetings hosted by the following groups will be prioritized:

- Farmer-focused: Crop Connect, Manitoba Beef Producer Annual Meeting & Trade Show, meetings organized by Keystone Ag Producers, Manitoba Forage & Grassland Association and Dairy Farmers of Manitoba.
- Municipal-focused: Manitoba Association of Regional Recyclers (MARR) Fall Forum and FCM's Annual Conference and Trade Show.
- Ag-retailer focused: Canadian Association of Agri-Retailers (CAAR) Conference.

8.3. One-on-one outreach with existing, potential and new collection sites

One-on-one conversations with municipalities and ag-retailers is the key tool that Cleanfarms is using to manage the transition of its collection network for containers (23L and under).

While group meetings (see Appendix A for a sample presentation) can be useful, this topic is best suited for individual conversations. Cleanfarms has a toll-free phone number to facilitate access to its staff.

9. Performance measures

The primary way that Cleanfarms measures the success of its programs is through its return rate, which compares the volume of the designated material sold into the marketplace with the volume collected.

Additional performance measures that may be considered include:

- Rinse rates (contamination rates)
- Public awareness
- Program efficiency
- Number of collection points (access)
- Market research to assess user satisfaction
- Collection site surveys to assess collection site experience and satisfaction
- Volumes collected by site or region

Performance measures are reported through its Annual Report. Note that Cleanfarms' fiscal year is the calendar year. Appendix E outlines key metrics associated with the EPFCP and other voluntary programs.

10. Dispute Resolution

All Cleanfarms members must abide by a very explicit Code of Conduct. The Code of Conduct comprises a number of important policies that include a code of business ethics, lobbying, privacy, complaints from the public and a dispute resolution process.

Cleanfarms' Dispute Resolution policy is broken down into two parts ('Complaints from the public regarding Members' and 'Complaints or disputes among Member') and is available online at www.cleanfarms.ca. Please see Appendix F for the full policy.

11. Consultation

11.1. *January to November 2022 – one on one meetings*

Cleanfarms sought input from key stakeholders through one-on-one meetings throughout 2022. Conversations largely centred on the change in collection site locations for containers (23L and under).

11.2. *December 2022 – January 2023 – document released for public comment*

An earlier version of the PSP was shared for public comment from December 9, 2022, to January 25, 2023. The purpose of the consultation is to invite stakeholders to:

- Provide advice about their needs, wants and expectations; and
- Comment on plans that have been outlined in the document.

11.3. *Consultation report*

A consultation report, Appendix G, captures the feedback received and indicates the how the feedback was incorporated.

Appendix A: Overview of Cleanfarms' planned transition of collection sites that manage containers (23L and under) and sample communication pieces.



Manitoba Small Container Collections
Cori Crawford, Cleanfarms



cleanfarms
Industry led, industry funded stewardship

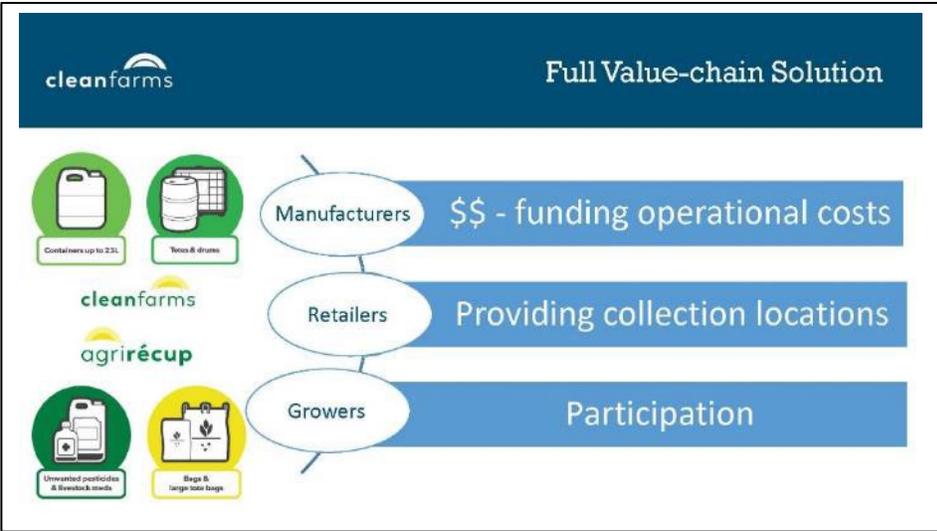
Cleanfarms/AgriRÉCUP

- Canadian non-profit industry stewardship organization committed to environmental responsibility through proper management of inorganic agricultural* waste

75+ members

- Pesticide, fertilizer, seed, animal health medication, ag plastics industries

3



cleanfarms Meeting Objectives

This meeting is meant to achieve 3 things:

- 1) Provide a clear understanding of **why** this is happening;
- 2) Provide a high-level overview of **how** we plan to undertake the transition;
- 3) Gather feedback/comments/concerns from municipalities before the transition begins

Full industry-wide support is needed to ensure a smooth transition.

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cleanfarms

Background Information

The Situation

- Collection of <23L containers takes place at municipal landfill and waste transfer stations in 2/10 provinces – Alberta & Manitoba
 - All other provinces use Return-to-Retail model
- September 2021, there was a recommendation to the Board of Directors to transition the AB & MB jug collection program to a return-to-retail model
 - The recommendation was passed

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The Catalyst

- The Agricultural Services Board (ASB) carried a resolution:
“That Alberta Environment and Parks develop, with CleanFARMS, an empty pesticide container program that places the responsibility of collecting pesticide containers in Alberta with the Agricultural Retail/Dealer and removes the responsibility from the municipalities.”
- Reasoning:
“Cuts to municipal budgets and changes to regulations that may affect the cost of repairing and maintaining these sites are at the heart of the issue for Alberta ASBs.”

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Resolution 2-21

- *“Since 1989, Alberta’s municipalities have been involved with the collection of empty pesticide containers and have done so with only one time funding from Alberta Environment & Parks to establish permanent collection sites within their municipalities, which many of these sites are in need of repair;”*
- *“Municipal governments in cooperation with transfer station and landfill operators manage the day to day maintenance and supervision of the sites and cover the costs associated with the transfer of containers from temporary depots to permanent sites without any funding from Alberta Environment and Parks;”*
- *“Collection programs are poised to become increasingly expensive and labor intensive with the addition of bale & silage wrap, Ag-film, twine and grain bag collection programs;”*

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- **Higher collection rates:** provinces with retail collection experience higher collection due to increased accessibility & convenience for growers.
- **Higher rinse rates:** with retail staff on site rinse rates are usually higher due to greater 'ownership' of/interest in the process
- **Health & safety** – containers collected at retail sites are bagged, picked up more frequently & sometimes stored inside – reduces potential for environmental issues
- **Industry-led program** – Retail-based collection ensures the program is 100% industry EPR
- **Harmonizing logistics and communications** across prairie provinces increases competition and access to service providers.

Transition from Municipal to Retail Collections

Municipal Collection

- Containers returned loose
- Containers picked up 1-3 x per year



Retail Collection

- Containers returned in collection bags
- Containers collected within 10 business days if 10+ bags on site



Transition Plan

- Cleanfarms is proposing a 3-year transition timeline across both provinces:
 - Updating the collection locations each year, starting from lowest-volume municipal sites to highest-volume municipal sites and replacing with ag retail locations
 - Blended collection logistics for the duration of the transition
- A coordinated effort will be required to ensure that, as municipal locations are closed, retailers in the affected areas are willing to accept containers to ensure the continued support and participation of growers.
- Communications materials and ongoing support for retailers, municipalities, and growers

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Province	# Municipal Sites	# Retail Sites	Total # Sites
Alberta	160	222	382
Manitoba	114	123	237
Both	274	345	619

Over 600 sites (& many more associations & growers)

- Key to success is effective engagement
- Manage workflow by selecting sites to work closely with each year
- What does engagement look like?

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Approach:

- The transition will be implemented in a phased approach to minimize negative impact on stakeholders
- This will include a focus on:
 - Service improvements
 - Municipal site volumes

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Service Improvements

- Involves directly picking up containers from stakeholders who historically dropped off at a collection site
- Stakeholders include:
 - Voluntary retail early-adapters
 - Aerial applicators
 - Hutterite colonies / large farms
 - Other

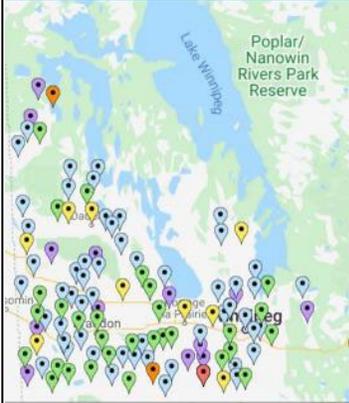
What this means: every retailer in Alberta & Manitoba will have the option to receive pickup starting April 1st

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Municipal Site Volume Analysis

- Phase out municipal sites in order of volume collected:
 - Zero volume sites – close Spring 2022
 - Lowest volume sites – close by Dec 31, 2022
 - Medium volume sites – close by Dec 31, 2023
 - Largest volume sites – close by Dec 31, 2024
- Work with retailers in conjunction with municipal site closure & engage retailers in highest volume areas early

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# lbs collected	# Sites	Close
0	30	2022*
1 to 4,999 lbs	45	2022
5,000 to 9,999	33	2023
10,000 to 14,999	3	2023
15,000 to 19,999	1	2023
20,000 to 24,999	1	2024
25,000 +	1	2024



Month	Year	Notes
Oct- Dec	2021	Consultation with ag retail head offices (one-on-one calls)
Jan	2022	Announce transition to ag retailers & municipalities
Feb	"	Host webinars with individual ag retailers and municipalities
March	"	Distribute information packages Phase out "zero volume" sites
March – Nov	"	Ongoing consultation with ag retailers & municipalities Distribute collection bags province-wide Offer retail collection for <23L containers
Dec 31st	"	Phase out "no/ low volume" municipal sites
Jan - Feb	2023	Grower outreach
Ongoing	"	Expansion of the retail collection network, continuous improvement of operations

- Retail
 - Retail head offices
 - Individual retail locations
 - Canadian Association of Agri-Retailers
- Government
 - Individual municipalities/ collection sites
 - Association of Manitoba Municipalities
 - Manitoba Association of Regional Recyclers
 - Manitoba Conservation and Climate
- Grower Associations
 - Keystone Ag Producers
 - MB Crop Alliance
 - MB Canola Growers
 - MB Pulse & Soybean Growers
 - Keystone Potato Producers Association Inc.
- Cleanfarms member companies
- Crop input distributors
- Manitoba Aerial Applicator Association

Communications

Communications Tools

Communications tools available to municipalities include:

- Outdoor signs
- Indoor posters
- Brochures
- Web tools
- Social media content



Progress to Date

Municipal Sites

- 5 phased out (0 volume sites) as per their scheduled date
- 14 phased out before their scheduled date as per request of the site
- 6 extended their phase out date to give locals additional time

Retailers – as of October 3rd:

- Over 1,400 bags of jugs have been collected
- 34 of Manitoba ag retailers (25% of total) are already collecting

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- Q. What if growers drop off containers after the transitional period?
- Q. What if we want to continue collecting after the transitional period?
- Q. What if there is no ag retailer in the municipality?
- Q. Will signs/ brochures/ web tools be available?
- Q. How do I submit a pickup request throughout or after the transitional period?

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Q. Are we still able to collect ag film and twine?

A. Yes. This transition will not impact the collection program for grain bags and twine. Sites interested in transitioning their container collection compound into an ag film & twine collection compound are encouraged to contact shieldst@cleanfarms.ca for more information.

Q. What are the guidelines for decommissioning a site?

The municipality must file a Notice of Alteration (NOA) to their licence, indicate the intent of the alteration (i.e., decommissioning the pesticide containers depot), and describe the decommissioning process. Approvals Branch will review the submission, and issue appropriate approval. Approvals Branch works together with our Environmental Compliance and Enforcement Branch to ensure appropriate closure of the pesticide container depot has taken place. The following is to be included in the submission:

1. Cover letter
2. NOA form (https://www.manitoba.ca/sd/pubs/environmental-approvals/hoa_form_hazardous_waste.pdf)
3. One hard copy and an electronic copy of the report/plan supporting the alteration
4. No fee

Appendix B – Collection site lists (as of January 31, 2023)

Municipal collection sites for containers (23L and under) are listed below with their recommended phase out date.

The most current version of this list is available [here](#).

Municipality/RM	Recommended phase out date
Municipality of Thompson	January 1, 2025 *REVISED*
RM of Roland	January 1, 2025 *REVISED*
RM of Stanley	January 1, 2025
Municipality of Louise	January 1, 2025
RM of Yellowhead	January 1, 2025
Municipality of Lorne-Swan Lake	January 1, 2025
RM of Pipestone	January 1, 2024 *REVISED*
RM of Cartier	January 1, 2024
RM of Pipestone	January 1, 2024
Town of Arborg/Municipality of Bifrost-Riverton	January 1, 2024
RMs of Minto-Odanah, North Cypress-Langford and Elton	January 1, 2024
City of Dauphin	January 1, 2024
Gilbert Plains Municipality	January 1, 2024
Municipality of Rhineland	January 1, 2024
Municipality of North Cypress-Langford	January 1, 2024
RM of Portage la Prairie	January 1, 2024
RM of Russell-Binscarth	January 1, 2024
RM of Macdonald	January 1, 2024
RM of Lorne	January 1, 2024
RM of Praire Lakes	January 1, 2024
Municipality of WestLake-Gladstone	January 1, 2024
Prairie View Municipality	January 1, 2024
RM of Springfield	January 1, 2024
RM of St. Clements	January 1, 2024
Municipality of Norfolk Treherne	January 1, 2024
RM of Whitehead	January 1, 2024
RM of Morton	January 1, 2024
RM of Cornwallis	January 1, 2024
Cartwright–Roblin Municipality	January 1, 2024
RM of Brenda-Waskada	January 1, 2024
Municipality of Glenboro – South Cypress	January 1, 2024
Grandview Municipality	January 1, 2024
RM of Wallace-Woodworth	January 1, 2024
RM of Victoria	January 1, 2024
RM of Morris	January 1, 2024
Municipality of North Norfolk	January 1, 2024
Municipality of Minitonas – Bowsman	January 1, 2024
Municipality of Oakland – Wawanesa	January 1, 2024
Municipality of WestLake-Gladstone	January 1, 2024
RM of Morris	January 1, 2024

Municipality/RM	Recommended phase out date
RM of Dauphin	January 1, 2024
Municipality of Norfolk Treherne	January 1, 2024
RM of Ste. Anne	January 1, 2024
RM of Whitemouth	January 1, 2023 *REVISED*
RM of Shell River	January 1, 2023 *REVISED*
Municipality of Minitonas – Bowsman	January 1, 2023 *REVISED*
Municipality of Emerson-Franklin	January 1, 2023
RM of Wallace-Woodworth	January 1, 2023
RM of Argyle	January 1, 2023
RM of Prairie Lakes	January 1, 2023
RM of Rosser	January 1, 2023
Municipality of Clanwilliam-Erickson	January 1, 2023
Prairie View Municipality	January 1, 2023
Municipality of Ritchot	January 1, 2023
RM of Riding Mountain West	January 1, 2023
Municipality of Pembina	January 1, 2023
Municipality of Two Borders	January 1, 2023
RM of Sifton	January 1, 2023
RM of Fisher	January 1, 2023
Riverdale Municipality	January 1, 2023
Municipality of Roblin	January 1, 2023
RM of Rosser	January 1, 2023
Municipality of Souris-Glenwood	January 1, 2023
RM of Woodlands	January 1, 2023
Municipality of Victoria	January 1, 2023
Municipality of Glenella-Lansdowne	January 1, 2023
Hamiota Municipality	January 1, 2023
Municipality of WestLake-Gladstone	January 1, 2023
Municipality of Lorne	January 1, 2023
Municipality of Grassland	January 1, 2023
RM of Oakview	January 1, 2023
Municipality of Roblin	January 1, 2023
RM of Sifton	January 1, 2023
RM of Grey	January 1, 2023
RM of Fisher	January 1, 2023
Municipality of Ethelbert	January 1, 2023
Municipality of Grassland	January 1, 2023
Municipality of Killarney Turtle Mountain	January 1, 2023
RM of Lac Du Bonnet	January 1, 2023
RM of Montcalm	January 1, 2023
RM of Tache	January 1, 2023
RM of Lakeshore	January 1, 2023
RM of McCreary	January 1, 2023

Municipality/RM	Recommended phase out date
Municipality of Ethelbert	January 1, 2023
RM of Lakeshore	January 1, 2023
RM of Oakview	January 1, 2023
RM of Lakeshore	January 1, 2023
Municipality of Ste. Rose	January 1, 2023
RM of St. Francois Xavier	January 1, 2023
RM of Montcalm	January 1, 2023
RM of Yellowhead	January 1, 2023
Village of Dunnottar	January 1, 2023
Municipality of Two Borders	January 1, 2023
Rosburn Municipality	January 1, 2023
Municipality of WestLake-Gladstone	January 1, 2023
Town of Swan River	January 1, 2023
Municipality of Swan Valley West	January 1, 2023
Municipality of De Salaberry	January 1, 2023
Municipality of Harrison Park	January 1, 2023
Municipality of Harrison Park	January 1, 2023
Municipality of Harrison Park	January 1, 2023
Mossey River Municipality	January 1, 2023
Mossey River Municipality	January 1, 2023
RM of Ellice-Archie	January 1, 2023
RM of West Interlake	Spring/Summer 2022 *REVISED*
RM of West Interlake	Spring/Summer 2022 *REVISED*
RM of St. Andrews	Spring/Summer 2022 *REVISED*
RM of St. Andrews	Spring/Summer 2022 *REVISED*
RM of Brenda-Waskada	Spring/Summer 2022 *REVISED*
RM of Brenda-Waskada	Spring/Summer 2022 *REVISED*
RM of Rockwood	Spring/Summer 2022 *REVISED*
RM of Rockwood	Spring/Summer 2022 *REVISED*
RM of Stuartburn	Spring/Summer 2022 *REVISED*
RM of Mountain	Spring/Summer 2022 *REVISED*
RM of Dufferin	Spring/Summer 2022 *REVISED*
RM of Elton	Spring/Summer 2022 *REVISED*
RM of Rockwood	Spring/Summer 2022 *REVISED*

Notes:

- Some communities have multiple collection sites.
A full listing is available at <https://batchgeo.com/map/e6e312dd2e163a817a65f113e5ba7ea9>.
- About 40 ag-retailers collected containers (23L and under) for Cleanfarms throughout 2022. Some of these locations may still be finalizing their plans for 2023, so they are not listed here.
- Collection sites are not actively being used during winter months. As of January 31, 2023, Cleanfarms is still reaching out to collection sites with a recommended phase out date of January 1, 2023 or earlier to confirm site status and interest in ongoing collections.

Collection sites for SPI bags and Totes and Drums are located in the following communities.

Altona	Gilbert Plains	Pierson
Angusville	Gladstone	Pilot Mound
Arborg	Glenboro	Plumas
Arnaud	Grandview	Portage La Prairie
Ashville	Grosse Isle	Reston
Baldur	Hamiota	Rivers
Basswood (Minnedosa)	Hartney	Roblin
Beausejour	Holland	Rosenort
Benito	Homewood	Rosser
Binscarth	Kenton	Shoal Lake
Birch River	Killarney	Snowflake
Birtle	Landmark	Souris
Boissevain	Lettelier	St. Claude
Brandon	Lowe Farm	St. Jean Baptiste
Brunkild	Macgregor	St. Joseph
Carberry	Manitou	St. Leon
Carman	Mariapolis	Starbuck
Cartwright	Marquette	Ste. Anne
Cypress River	Meadows	Ste. Agathe
Darlingford	Melita	Stonewall
Dauphin	Miniota	Strathclair
Deloraine	Minitonas	Swan Lake
Dencross	Minnedosa	Swan River
Douglas	Minto	Teulon
Dufrost	Morris	Treherne
Dugald	Neepawa	Virden
Elm Creek	Niverville	Waskada
Fisher Branch	Notre-Dame-De-Lourdes	Wawanesa
Fork River	Oak Bluff	Westbourne
Franklin	Oakbank	Winkler
	Oakville	

Some communities have multiple collection sites.

A full listing is available at <https://batchgeo.com/map/e6e312dd2e163a817a65f113e5ba7ea9>.

Appendix C- Health, Safety and Environmental Standards for Container Collection and Shredding

Best Practices for Protecting Health & Safety of Workers and the Environment 2008 TABLE OF CONTENTS

SCOPE

FACILITY PROVISIONS

- Security
- Fire Protection

POLICY & PROCEDURE

OPERATIONS

- Dealing with Drums & Totes
- Maintenance of Equipment

CHEMICAL HEALTH & SAFETY

- Personal Hygiene
- Health Surveillance
- Assessment of Fitness to Wear Respirators

PERSONAL PROTECTIVE EQUIPMENT

- Clothing
- How to Treat Contaminated Clothing

GLOVES

- Glove Selection
- Wearing Gloves
- Cleaning gloves

FOOTWEAR

EYE and FACE PROTECTION

RESPIRATORY DEVICES

- Proper Use of APR Respiratory Devices
- Fit Testing Respirators
- Cleaning Respirators

TRAINING

UNDERSTANDING CROP PROTECTION CHEMICALS

- What Are Crop Protection Chemical Formulations?
- How is Chemical Toxicity Evaluated?
- Label Symbols
- How Can Crop Protection Chemicals Enter the Body
- Indicators of Overexposure to Crop Protection Chemicals
- Poisoning Symptoms
- What to Do When Poisoning Symptoms Appear
- What Other Health Risks Do Crop Protection Chemicals Present

EMERGENCY PREPAREDNESS

- Worksite Emergency Preparations
- First Aid for Crop Protection Chemical Poisoning
- Road Crew Emergency Preparations

ENVIRONMENTAL PROTECTION

- Central Facility
- On the Road
- Parking the Unit
- Guidelines for Mobile Pesticide Storage Facilities (adapted from Alberta Environment)
- Dealing with Waste
- Labels

Appendix 1: Symptoms of Exposure to Select Products

Appendix 2: Summary of Safety Properties of Some Fabric Coatings

Note – This is the table of contents only. The full document is available upon request.

Appendix D – Sample promotion & education materials

Paid media

Scan to learn more!

LET'S MAKE IT TO 100%

In 2022, recycle every jug

cleanfarms
Find a collection location near you at cleanfarms.ca
info@cleanfarms.ca @cleanfarms

Cleanfarms' recycling programs help Canadian farmers take care of their land for present and future generations. By taking empty containers (jugs, drums and totes) to nearby collection sites, farmers proudly contribute to a sustainable community and environment. When recycling jugs, every one counts.

Ask your ag retailer for an ag collection bag. Fill it with rinsed, empty jugs and return to a collection site.

And, go to cleanfarms.ca to find out about managing empty seed, pesticide and inoculant bags in your province.

Watch for details about new 2022 recycling collection sites for jugs in Alberta and Manitoba. Check with cleanfarms.ca and your local retailer.

Radio script:

Farmers...now that you've seeded and sprayed, remember to recycle empty pesticide and fertilizer jugs. Take them to a Cleanfarms collection site. You'll be keeping your farm clean and sustainable for present and future generations...and protecting the environment. Recycled jugs are made into new plastic products. Every one counts...so please recycle 100% of them. Find a nearby collection site at Cleanfarms dot ca...look for what to recycle where.

Tools for retailers

Posters

Let's make it to 100% in 2022

Recycle every bag and container!

Containers up to 25L

Bags & larger tote bags

Totes & drums

- 1 Rinse**
Rinse or pressure wash to ensure no product is wasted.
- 2 Remove/Bag**
Obtain free collection bags from retailer or seed dealer. Remove loose soil (and discard), bag containers & be closed.
- 3 Return**
Return properly prepared materials to your participating retailer or seed dealer. Check first to confirm which items they are accepting.

Remember
Bag seed treatment containers in a separate collection bag.
Do not remove caps from 100L totes.
Store unwanted pesticides safely on farm until the next collection event.

Cleanfarms.ca
info@cleanfarms.ca @cleanfarms

Statement stuffer (Point of Sale tools)

cleanfarms

Let's make it to 100% in 2022

Recycle every bag and container!

Containers up to 25L

Bags & larger tote bags

Totes & drums

SCAN ME

Cleanfarms.ca
info@cleanfarms.ca @cleanfarms

Web banners

cleanfarms

Let's make it to 100% in 2022

Recycle every bag and container!

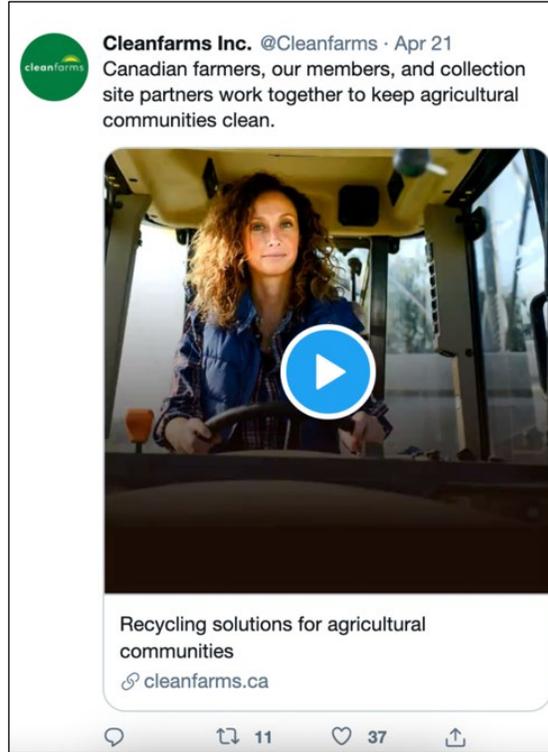
Containers up to 25L

Bags & larger tote bags

Totes & drums

Cleanfarms.ca

Sample social media posts:



Pieces related to use of collection bags

cleanfarms

Containers up to 23L

Jug recycling is getting easier...

Cleanfarms ag recycling bags now available!

Use ag recycling bags for the <23L pesticide and fertilizer jug recycling program.

Ask for one at your local ag-retailer.

Return full bags of rinsed jugs to your **municipal** collection site.

Cleanfarms.ca
 info@cleanfarms.ca
 @cleanfarms

cleanfarms 10 YEARS

Easy steps to 100% recycling

- 1. Rinse & remove**
 Use chemical handler OR triple rinse OR pressure rinse jugs; remove paper booklets, and where possible, caps; discard both.

- 2. Fill bag & close**
 Place empty rinsed containers in ag recycling bag and securely close with a tie wrap, rope or knot. **Only one material type per bag** (i.e., jugs). Bags with mixed materials cannot be accepted.

- 3. Return to municipal site**
 Return full bag to your **municipal** collection site for recycling.

WHAT'S IN	WHAT'S OUT
Clean, rinsed pesticide & fertilizer containers (jugs) (classified as 'Commercial' or 'Agricultural') up to 23L	Unrinsed containers
Seed treatment containers must be handled separately. Caps are to remain securely ON unrinsed seed treatment containers (all colours) and jugs placed in a separate collection bag.	Containers used for home and garden care with the words 'Domestic' on their label

Every jug counts!
 Find out about other Cleanfarms ag recycling programs. Visit **Cleanfarms.ca**

cleanfarms 10 YEARS

Seed, Pesticide and Inoculant Bag Brochure:



Ag plastic recycling is getting easier...

Two new Cleanfarms initiatives to help manage ag waste sustainably!



Containers up to 23L



Bags & large tote bags

1. Ag recycling bags available for province-wide jug recycling program
2. Seed and pesticide bag collection program available at participating ag-retailers

To learn about other Cleanfarms programs visit Cleanfarms.ca



Containers up to 23L

Ag recycling bags available for jug recycling



Use ag recycling bags for the <23L pesticide and fertilizer jug recycling program.

Ask for one at your local ag-retailer.

Return full bags of rinsed jugs to your municipal collection site.

Easy steps to 100% recycling: jugs

- 1. Rinse & remove**
Use chemical handler OR triple rinse OR pressure rinse jugs; remove paper booklets, and where possible, caps; discard both.



- 2. Fill bag & close**
Place empty rinsed containers in ag recycling bag and securely close with a tie wrap, rope or knot. Only **one material type per bag** (i.e., jugs). Bags with mixed materials cannot be accepted.
- 3. Return to municipal site**
Return full bag to your **municipal** collection site for recycling.

WHAT'S IN	WHAT'S OUT
Clean, rinsed pesticide & fertilizer containers (jugs) (classified as 'Commercial' or 'Agricultural') for the <23L pesticide and fertilizer jug/ container recycling program	Unrinsed containers
Seed treatment containers must be handled separately. Caps are to remain securely ON untreated seed treatment containers (all colours) and jugs placed in a separate collection bag.	Containers used for home and garden care with the words 'Domestic' on their label

Every jug counts!
Find out about other Cleanfarms ag recycling programs. Visit Cleanfarms.ca



Cleanfarms.ca
info@cleanfarms.ca @cleanfarms





Quick guide



Bags & large tote bags



Containers up to 23L

	SEED & PESTICIDE BAG COLLECTION	AG RECYCLING BAG FOR JUGS
What's in	1-1,000 kg seed & pesticide bags	<23 L pesticide & fertilizer jugs (see special instructions for seed treatment containers)
Clean material	Empty bags completely (do not shake)	Use chem handler, triple rinse or pressure rinse jugs; remove paper booklets, and where possible, caps; discard both
Prep steps	Small bags: place in ag bag & secure Large bags: bundle 5 or 6 together; secure with twine	Place jugs in ag bag & secure closed
Where to drop off	Participating ag-retailer	Municipal collection site
Drop off	May 1 through October 31	
End of life	Energy recovery at waste-to-energy facility	Recycled into on-farm products (e.g., drain tile)

IMPORTANT
Only one type of material per bag or bundle. Do not place jugs and bags in the same collection bag. Placing mixed materials in collection bags will result in rejection.



Bags & large tote bags

Environmentally safe way to manage empty seed and pesticide bags



Get a free Cleanfarms ag collection bag from this participating ag-retailer.

Fill collection bag with 50 to 60 small (<100kg) empty seed and pesticide bags. When full, securely tie top and return bag to ag-retailer.

Bags accepted May 1 to October 31.

Seed and pesticide bags safely managed at a waste-to-energy facility.

Easy steps to 100% recycling: seed and pesticide bags

- 1. Empty**
Empty bags completely. To avoid dust, do not shake seed bags.
- 2. Bag or fold**

SMALL BAGS	LARGE TOTE BAGS
1-100 kg	500-1,000 kg
Place small bags in ag collection bag	Fold large bags in bundles of 5 or 6
When full, close and secure with tie wrap, rope or knot	Secure with twine



- 3. Return to ag-retailer**
Return full bag or bundle to participating ag-retailer site for proper disposal.

WHAT'S IN	WHAT'S OUT
All pesticide & seed bags: small (up to 100 kg) or large (greater than 100 kg, usually 500 kg or 1,000 kg)	Feed bags
	Fertilizer bags (excluding Quebec which accepts them)

IMPORTANT
Placing mixed materials in collection bags will result in rejection.

This pilot program is supported by the Canadian Seed Trade Association (CSTA).

To learn about other Cleanfarms programs visit Cleanfarms.ca



Cleanfarms.ca
info@cleanfarms.ca @cleanfarms



Transition of containers (23L and under) collections from municipal to ag-retail locations

Brochure



Return empty ag jugs to retail **Call for hours of operation**

All Manitoba municipal ag jug depots to close by December 31, 2024

Bring 'em all back

Empty ag jug recycling is moving to retail collection sites in Manitoba

Between now and the end of 2024, empty ag jug collection sites will move from municipal depots at landfill sites and transfer stations to ag retail collection sites across Manitoba.

Existing municipal ag depot sites will gradually close on a set schedule. Look for signs at each site to find out when it will close.



Ask your Ag Retailer

As municipal depots are closing, ag retail collection sites will be adding <23L jugs to their collection programs. Our goal is to ensure that recycling your used ag jugs remains just as easy and convenient as it always has been.

Information about new collection locations will be updated at cleanfarms.ca and you can check with local ag retailers about when they plan to add this service.

Consider asking ag retailers that collect non-deposit bulk containers or seed, pesticide and inoculant bags if they are accepting jugs (or plan to soon).




What else should we know?

When you purchase pesticides and fertilizers your ag retailer will give you a **free ag collection bag** to store and transport your empty, rinsed containers. Please use a **separate bag** for your seed treatment containers; fill & tie the bags, then bring them all back for collection.

Why is this happening?

Across Canada, farmers return empty ag jugs to ag retailers and it works well. One goal is to save a step for growers – so when you want to recycle used pesticide & fertilizer packaging, they're all going to the same place: your local ag retailer.

Does this mean there's a cost to recycle now?

Drop off is **free** at participating ag retailers.

For more information

Find out where to recycle used ag containers and seed, pesticide and inoculant bags: cleanfarms.ca/materials/containers-up-to-23l

Cleanfarms staff are always here to help you: info@cleanfarms.ca or 877.622.4460




Web banner and capsule



Empty ag jug recycling is moving to retail collection sites in Manitoba.

Don't forget to ask if your retailer is collecting used ag jugs now.

Details: cleanfarms.ca/mb-ab-jug-transition



Bring 'em all back

Empty ag jug recycling is moving to retail collection sites in Manitoba.

Don't forget to ask if your retailer is collecting used ag jugs now.



cleanfarms.ca/mb-ab-jug-transition

Paid media



Update on Locations for Container Recycling!

cleanfarms

Cleanfarms is updating the list of collection sites for under 23L pesticide and fertilizer containers.

For 2023, Cleanfarms is revising collection site locations for recycling empty 23L and smaller pesticide and fertilizer containers. As ag retailers come online as the main way to recycle jugs, municipal depots are gradually stepping down as collection sites for jugs over the next two years.



Find the closure dates of municipal pesticide and fertilizer container recycling sites nearest you at: cleanfarms.ca/mb-ab-jug-transition/ or scan QR code.



Bag Your Empty Containers!

Get your free container collection bag at your local ag retailer.

cleanfarms

info@cleanfarms.ca [f](#) [t](#) [@cleanfarms](#)



UPDATE ON LOCATIONS FOR CONTAINER RECYCLING!

cleanfarms

Cleanfarms is updating the list of collection sites for under 23L pesticide and fertilizer containers.

For 2023, Cleanfarms is revising collection site locations for recycling empty 23L and smaller pesticide and fertilizer containers. As ag retailers come online as the main way to recycle jugs, municipal depots are gradually stepping down as collection sites for jugs over the next two years.



Find the closure dates of municipal pesticide and fertilizer container recycling sites nearest you at: cleanfarms.ca/mb-ab-jug-transition/ or scan QR code.

info@cleanfarms.ca [f](#) [t](#) [@cleanfarms](#)



BAG YOUR EMPTY CONTAINERS!

Get your free container collection bag at your local ag retailer.

Follow these 3Rs to ensure that your containers are accepted and can be recycled:

- 1. Rinse** – Triple or pressure rinse to ensure no product is wasted. Review our container rinsing procedures at cleanfarms.ca/materials/containers-up-to-23l
- 2. Remove** – Remove caps and paper booklets (place in garbage); leave the glued on label. Remove metal handle from fertilizer pails.
- 3. Return to your local collection site** – to find the closure date of the municipal site nearest you, go to cleanfarms.ca/mb-ab-jug-transition/ or scan the QR code.



Transitioning Small Container Collection from Municipal to Retail Sites

Alberta & Manitoba – 2022 to 2024

Between 2022 and 2024, the <23L container collection program will undergo a gradual change that will align it with other provinces, enabling farmers to bring back these containers to their local retail outlets.

The change is being phased in gradually to reduce the burden on retail and municipal services, and to increase convenience for farmers who can now bring the containers back to the retail outlets that they frequent.

Thank you!

We'd like to thank all municipal collection partners who have provided such excellent services to the program over many years, as well as our retail collection partners who are adding this new element to their services, and growers in both provinces for continuing to do your part to ensure that these containers can be recycled into new products and packaging!

Information on this page

This page provides all the information that you'll need to know as the changes take effect. It's split into the three tabs below. Please click the tab that most meets your needs.

In addition, please see [June 2022 news releases](#) with details about this program, for [Alberta](#) and [Manitoba](#).

Additional questions?

If we've missed something, please be sure to let us know, with an email to Manager, Sustainability and Performance, [Cori Crawford](#).



Earned media

Cleanfarms Moving Ag Plastic Jug Recycling to Manitoba Ag Retailers Over Next 3 Years

June 13, 2022

WINNIPEG, MB – [Cleanfarms](#), the stewardship organization that collects used agricultural plastics for recycling, announced today it is changing its [recycling drop off locations in Manitoba](#) where producers take empty 23L and smaller plastic pesticide and fertilizer containers.

The recycling collection system is gradually transitioning from sites at municipal transfer stations and landfill facilities to collecting empty ag jugs at Manitoba agricultural retail operations.

The transition to ag retailers is being phased in over three years. The first phase is starting with municipal collection sites that, even though open to receive empty containers from producers, have had little or no containers dropped off there for the past few years.

Cleanfarms Executive Director Barry Friesen said there are several reasons why the change to ag retailers makes sense.

“Transitioning to a retail-based collection for the jug program shifts responsibility to accept empty containers from Manitoba municipalities to the ag industry, which harmonizes the collection system across Canada. In all other provinces except Manitoba and Alberta, we collect empty containers at ag retailers,” Friesen said. Alberta will be transitioned on the same three-year schedule.

Friesen noted that collecting small ag pesticide and fertilizer containers at ag retailers makes recycling the empty containers more convenient for producers.

“For one thing, having ag retailers accept empty containers means we have more drop off locations with longer operating hours,” Friesen said. “For another, producers can return small and large bulk containers to a location that they already go to on a regular basis. It makes recycling easier for most growers.”

Currently, producers return empty bulk containers—23L to 1000L drums and totes—to ag retailers while they take smaller empty containers to municipal collection sites for recycling.

Friesen said another advantage of the revised drop off system is that when producers go to ag retailers to purchase crop input products, they can get a free large plastic bag that makes collecting, storing and transporting small empty containers more efficient. The bags hold about 45 empty containers each.

“Producers like the plastic bags,” Friesen says. “They make managing empty containers simple. In provinces where we’ve been using plastic bags for a while, recycling rates have increased. Bags make it easier to manage empties so producers bring back more of them for recycling. This works quite well.”

Cleanfarms is also making it easier for high-volume generators of empty jugs such as aerial applicators, landscapers and large acreage farms to recycle more containers. Operators can arrange for on-site pickup. Operators should email crawfordc@cleanfarms.ca for more information.

Friesen said he’s very grateful to Manitoba municipalities for helping to make the container recycling program a successful packaging stewardship program in Canada.

“We owe our gratitude to Manitoba municipalities for giving producers a convenient location to drop off empty containers. Now ag retailers in those areas will step into those big shoes. Our plan is to have every ag retailer that sells product in 23L containers accept the empty jugs from their customers to ensure producers have the same or better access to recycling. So, it should be convenient,” Friesen said.

The phased in approach will see 10 local areas transition in early 2022. As noted, these municipal locations have not been extensively used in recent years. In case producers do go there, signage is prominent, along with Cleanfarms website information to redirect producers to the new, nearby collection sites. Ag retailer sites will open, some even before municipal sites close, to accept empty pesticide and fertilizer containers.

The Manitoba municipal collection sites closing in early 2022 are:

Site	Municipality	Town
Bellsite	RM of Mountain	Bellsite
Bowsman	Municipality of Minitonas – Bowsman	Bowsman
Carman	RM of Dufferin	Carman
Forrest	RM of Elton	Forrest
Miami	Municipality of Thompson	Miami
Roland	RM of Roland	Roland
Stonewall	RM of Rockwood	Stonewall
Whitemouth	RM of Whitemouth	Whitemouth
Woodnorth	RM of Pipestone	Woodnorth
Onanole	RM of Harrison Park	Onanole

At the end of December 2022, a further 64 municipal sites that typically collect low volumes of containers will close. The full transition of municipal sites to ag retailers will continue through 2023 and 2024. Communications and notifications will occur prior to each round of transitions and all information will be included on the Cleanfarms website at cleanfarms.ca/mb-ab-jug-transition/. Producers should ask their ag retailers when they can start returning empty jugs to those locations.

Cleanfarms, a national non-profit industry stewardship organization, was created in 2010 to manage empty 23L and smaller containers and other ag waste materials for recycling or proper disposal. Cleanfarms has more than 1,500 locations throughout Canada that accept empty pesticide and fertilizer containers from farmers so they can be recycled. Cleanfarms operates the program on behalf of its member companies which are Canada’s leading developers, manufacturers, distributors and retailers of crop protection products and fertilizers.

Many retail recycling locations also accept empty seed, pesticide and inoculant bags for proper disposal. Complete information on the ag waste materials accepted and the location of collection sites is published on Cleanfarms.ca

Preparing Empty Pesticide and Fertilizer Containers

The ag industry, with support from CropLife International, has strict requirements for the handling, processing, recycling and end use of pesticide and fertilizer jugs to ensure that they are handled with the highest health, safety and environmental standards, including full traceability of all jugs.

Producers are required to:

1. Rinse containers (by way of chemical handler/ triple rinsing/ or pressure rinsing)
2. Remove paper booklets, and discard; take caps off and discard

3. Place rinsed containers in a collection bag and securely close (and not place any other materials in the collection bag other than pesticide and fertilizer jugs)

Seed Treatment Containers – Handle seed treatment containers differently by keeping caps securely ON to prevent contamination and by bagging all seed treatment containers separately from non-seed treatment containers.

-30-

Samples of media coverage

- Steinbach Online, Cleanfarms to move ag plastic jug recycling to Manitoba ag retailers over next 3 years
July 11, 2022
<https://steinbachonline.com/articles/cleanfarms-to-move-ag-plastic-jug-recycling-to-manitoba-ag-retailers-over-next-3-years>
- Manitoba Cooperator, Farm retailers take over collection of ag plastic jugs
July 4, 2022
<https://www.manitobacooperator.ca/news-opinion/news/farm-retailers-take-over-collection-of-ag-plastic-jugs/>

Trade association coverage – April 2022

Source: <https://caar.org/the-communicator/april-2022/1589-changes-to-pesticide-and-fertilizer-container-collection-programs-in-alberta-and-manitoba>

Changes to Pesticide & Fertilizer Container Collection Programs in Alberta & Manitoba BY CANADIAN ASSOCIATION OF AGRI-RETAILERS ISSUE: [APRIL 2022](#)

Cleanfarms' empty pesticide & fertilizer container recycling program undergoes a big change in Alberta and Manitoba.

The purpose is to encourage 100 percent recycling of <23L pesticide and fertilizer containers. Beginning in 2022, **Cleanfarms Inc.** will be working with retailers in the provinces of Alberta and Manitoba to transition the collection of <23L empty pesticide and fertilizer containers to a retail-based collection model.

Cleanfarms is a non-profit environmental stewardship organization working to ensure Canadian farmers can actively contribute to a healthy environment and a sustainable future. Among its programs, Cleanfarms runs a collection program for <23L pesticide and fertilizer containers for developers, manufacturers, distributors and retailers of pest control products and fertilizers in Canada.

Excluding Manitoba and Alberta where these containers have been collected at municipal collection sites since 1989, the rest of the provinces have been collecting these containers at ag-retail locations.

Agri-retailers in Alberta and Manitoba have been involved in this decision-making process and each supports the provincial transition.

Manitoba Agri-Retailers

The decision to move to a retail-based collection model was arrived at in Manitoba after the company's five-year review of its recycling programs in conjunction with renewal of its *Industry Stewardship Program Plan*.

Cleanfarms recommended the standardization of the <23L pesticide and fertilizer container program to collect the jugs at agri-retail locations across Canada.

As such, beginning Spring of 2022 and running through the initial three-year window through to 2024, agri-retailers should allow for the collection of these <23L containers whereby Cleanfarms' contractors will pick up for proper disposal.

Based upon historical volumes, Cleanfarms said that municipal collection sites in Manitoba will be phased out over a three-year period.

Zero volume sites will close prior to Spring 2022, while low volume sites of less than 5,000 lbs/year north of Riding Mountain National Park will shutter at the end of the calendar year.

The medium sites of 5,000 to 10,000 lbs/year will all close by the end of 2023, and high-volume sites consisting of greater than 10,000 lbs/year will close by the end of 2024.

If you have not yet already been advised, Cleanfarms has indicated it will soon reach out to all Manitoba retail sites to advise them of any closures of the zero or low-volume sites.

It is expected that by December 31, 2024, all municipal collection sites will have become fully decommissioned, and that as of January 1, 2025, agri-retailers in Manitoba will be the sole point of drop-off for their customers' empty <23L fertilizer and pesticide containers—with exceptions, detailed below.

When a large-enough volume of empty containers has been accumulated by the agri-retailer—that volume amount is self-determined but must be for 10 bags or more—a request for pickup can be made to Cleanfarms.

Although the onus for pickup of the containers will be placed on the agri-retailer, Cleanfarms said that for larger-volume customers of a fertilizer and/or pesticide product—aerial inputs or Hutterite colonies or simply really large farms—it will also offer a direct pick-up option.

For customers who deal in volumes greater than 1,500 containers, agri-retailers are asked to have the client call Cleanfarms directly to arrange pick up.

To aid in this transition and to educate your customers, Cleanfarms will distribute to agri-retailer sites and currently in-use disposal sites a range of communications materials, including outdoor signage, posters, and brochures.

Alberta Agri-Retailers

In 2021, the Alberta Agricultural Services Board asked Cleanfarms and the Alberta Environment and Parks to arrange for the transition of <23L fertilizer and pesticide containers away from municipal jurisdictions.

Alberta's agri-retailers were involved in this decision-making process to have the containers picked up at its premises.

As with Manitoba, Alberta will transition in 2022 through 2024 from a municipal collection model to a retail-based collection model.

Beginning Spring of 2022, agri-retailers in the province will allow for the collection of the <23L pesticide and fertilizer containers, with Cleanfarms' contractors picking up the containers from both municipalities and the agri-retailer as the program transitions.

All zero volume sites will close before Spring of 2022. Low volume sites of less than 5,000 lbs/year in the Peace region will close by the end of 2022.

The medium volume sites of 5,000 to 10,000 lbs per year will close by the end of 2023, and high volume sites of those greater than 10,000 lbs annually will completely close by the end of 2024.

For transparency, Cleanfarms said it would contact all agri-retail facilities within proximity to advise them of closures of the sites.

All of the municipal container collection stations will be fully decommissioned by December 31, 2024, and as of January 1, 2025, Alberta agri-retailers will assume responsibility as a centralized drop-off container location for its clients.

Like Manitoba, Cleanfarms will also offer direct pick-up of containers from the largest users of these containers, such as those providing aerial inputs or Hutterite colonies or large farms.

Cleanfarms asks all agri-retailers who deal with customers of greater than 1,500 containers, that the customer should contact Cleanfarms directly to arrange pick up.

Again, Cleanfarms will provide communications materials such as outdoor signage, posters, and brochures to sites as applicable.

The Process

The way the collection service works is identical for Alberta and Manitoba. Manitoba agri-retailers must order collection bags from Cleanfarms' online (<https://collection.cleanfarms.ca/#/login>)

For Alberta retailers—**Cargill, Federated Coop, Nutrien Ag Solutions, UFA, Richardson**, and the independents—Cleanfarms offers specific bag ordering details. Please see the table located at: <https://cleanfarms.ca/ag-recycling-bags/>

Please note that the collection bags are free of charge to the agri-retailer and should remain so for your customers. Rolls of the bags will be delivered to each agri-retailer as of March 2022.

Each bag holds 45 <23L jugs. Each roll contains 40 bags. Bags are 40"x34"x70" in size and are 3.75 mil thick. These bags are made with at least 25 percent recycled content from household recycling programs—though not necessarily from your province.

Provision of the bags to your client should be done at the time of product purchase. If purchase has occurred prior to the onset of this program, agri-retailers are encouraged to inform customers of this program and to arrange for pickup/delivery of said collection bags.

Obviously, these bags—each capable of holding approximately 45 <23L containers—provide the user with an easy way to collect and transport the empty jugs from farm to agri-retail site.

This does imply, however, that agri-retailers must ensure for provision of a storage area for the empty containers, easily accessible by both the agri-retailer, its customers and for Cleanfarms' contractors when pick up is arranged.

Note that these same collection bags are used for seed, pesticide/fertilizer, and inoculant (SPI) bag collection program—but each must be previously separately bagged whether by the customer or the agri-retailer, as the materials are sent to different recycling/safe disposal facilities.

Growers/users of the <23L containers should be informed they must first:

- Remove and discard any attached paper booklets;
- Rinse containers using a chemical handler, triple rinsing, or pressure rinsing technique;
- Place rinsed containers in a collection bag and secure close;
- Do NOT place any other materials in the collection bag—ONLY fertilizer and pesticide jugs;
- For seed treatment containers, ensure caps are securely in place, and bag separately from non-seed treatment containers.

Agri-retailers should only accept properly prepared collection bags.

After accumulating a large-enough collection of bags—Cleanfarms is interested in providing a small carbon footprint, too—agri-retailers should use the online pickup request system at <https://collection.cleanfarms.ca/#/login>.

Requests to pick up 10+ collection bags will be picked up within 10 business days.

Cleanfarms said it will send messaging to agri-retailers about this pilot collection program for seed, pesticide/fertilizer, and inoculant bags—and if you have not received any communication by early April or have any questions or concerns, please contact Cori Crawford via email at crawfordc@cleanfarms.ca or call 1-877-622-4460.

Company information is available at <https://cleanfarms.ca/>.

Appendix E – Key metrics, 2012 – 2021

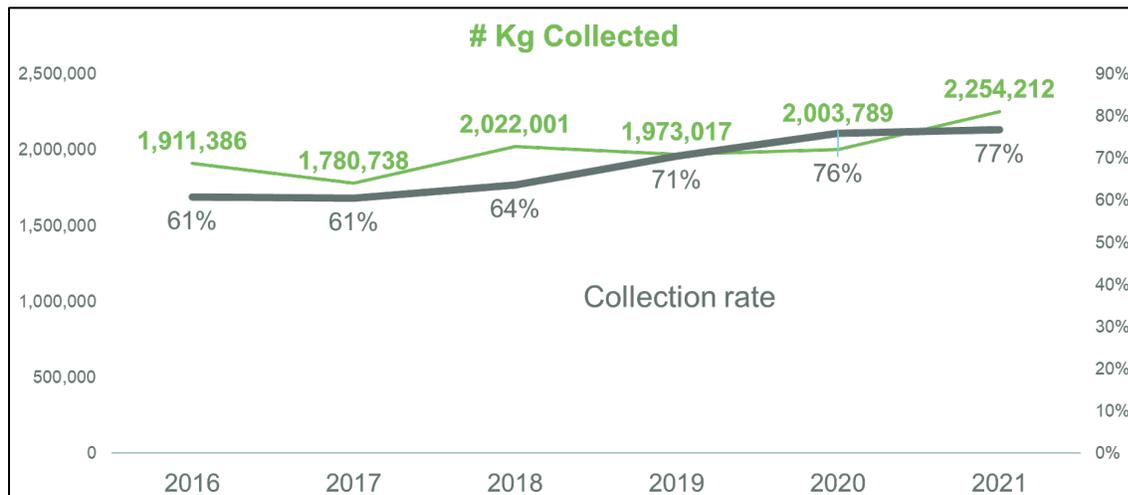
Manitoba collection volumes

Year	Designated material or item		
	Containers* (23L and under)	Totes & drums (23L and over)	SPI Bags (Kg)
2012	248,998		
2013	256,022		
2014	227,473		
2015	211,255		
2016	154,973	3,581	
2017	203,097	3,751	
2018	270,481	3,708	
2019	188,486	3,009	450
2020	114,810	4,210	N/A**
2021	383,546	4,160	753
2022	Not available		

*There are notable fluctuations with volumes due to delays related to processing containers.

**Pilot collections delayed due to Covid-19.

Canada wide collection metrics – Containers (23L and under)



Appendix F – Dispute Resolution

The following is an excerpt from Cleanfarms' Code of Conduct and outlines the organization's Dispute Resolution process, Section 7 of Cleanfarms' Code of Conduct (available at www.cleanfarms.ca)

SECTION 7: DISPUTE RESOLUTION

7.1 Complaints from the public regarding Members

7.1.1 Complaints made to Cleanfarms by a member of the public concerning the conduct of a Member must be addressed in writing to the official representative of the company and the General Manager of Cleanfarms. On receipt of such a complaint, the General Manager will refer the matter to the Member involved for resolution of the issue.

7.1.2 Members hereby agree to indemnify and hold Cleanfarms harmless from any from and against all costs, charges and expenses, including all amounts paid to settle any action or satisfy any judgment reasonably incurred by or on behalf of Cleanfarms in respect of any civil, criminal or administrative action, private arbitration, or other proceeding, to which Cleanfarms is or may become a party (or any such proceeding which might be threatened and in respect of which Cleanfarms is threatened to be made a party) by reason of any negligence or wilful misconduct of the Member or by reason of a failure by the Member or any of its representatives to conduct itself in accordance with this Code of Conduct or with any requirements prescribed by Cleanfarms with respect to its stewardship programs.

7.2 Complaints or disputes among Member

7.2.1 Members consent and agree that disputes or controversies among Members, Directors, Officers, committee members, or volunteers of Cleanfarms concerning matters relating to Cleanfarms' articles, by-laws, Code of Conduct, approved corporate policies or operations ("Eligible Disputes") are to be resolved in accordance with mediation and/or arbitration as provided in Section 7.2.2.

7.2.2 Dispute Resolution Mechanism

In the event that an Eligible Dispute is not resolved in private meetings between the affected parties within 30 days of the written notice of an Eligible Dispute delivered by one of the parties to Cleanfarms and the other affected parties, then such Eligible Dispute shall be settled by a process of dispute resolution as follows:

7.2.2.1 The dispute or controversy shall first be submitted to a panel of mediators whereby the one party appoints one mediator, the other party (or if applicable the board of the organization) appoints one mediator, and the two mediators so appointed jointly appoint a third mediator. The three mediators will then meet with the parties in question in an attempt to mediate a resolution between the parties.

7.2.2.2 The number of mediators may be reduced from three to one or two upon agreement of the parties.

7.2.2.3 If the parties are not successful in resolving the dispute through mediation, then the parties agree that the dispute shall be settled by arbitration before a single arbitrator, who shall not be any one of the mediators referred to above, in accordance with the provincial or territorial legislation governing domestic arbitrations in force in the province or territory where the registered office of Cleanfarms is situated or as otherwise agreed upon by the parties to the dispute. The parties agree that all proceedings relating to arbitration shall be kept confidential and there shall be no disclosure of any kind. The decision of the arbitrator shall be final and binding and shall not be subject to appeal on a question of fact, law or mixed fact and law.

7.2.2.4 All costs of the mediators appointed in accordance with this section shall be borne equally by the parties to the dispute or the controversy. All costs of the arbitrators appointed in accordance with this section shall be borne by such parties as may be determined by the arbitrators.

Appendix G – Consultation Report

1. Introduction

Cleanfarms currently operates an empty pesticide and fertilizer container recycling program (EPFCP) under an approved program stewardship plan pursuant to the Packaging and Printed Paper Stewardship Regulation, 195/2008 issued under The Waste Reduction and Prevention Act (C.C.S.M. c. W40). This approved stewardship program plan expires on June 30, 2023.

Cleanfarms has submitted a revised plan, named the Crop Input Packaging Recovery Program (CIPRP), to Manitoba Environment, Climate and Parks for approval.

The CIPRP recommends some major changes so engagement efforts began in early 2022. As of January 31, 2023, these efforts are ongoing because agricultural stakeholders sometimes have more time available for consultations during their offseason, which is over the winter.

This report summarizes the process and feedback Cleanfarms undertook throughout 2022 and January 2023.

1.1. Key changes

The CIPRP recommends two changes that are outlined below:

Change	EPFCP (2018 – 2023)	CIPRP (2023 – 2028)
Designated materials	<ul style="list-style-type: none">• Pesticide and fertilizer containers (23L and under)	<ul style="list-style-type: none">• Pesticide and fertilizer containers (23L and under)• Pesticide and fertilizer totes & drums (23L and over)• Seed, pesticide and inoculant bags
Collection network for containers (23L and under)	<ul style="list-style-type: none">• Municipal collection sites	<ul style="list-style-type: none">• Ag-retail collection sites (preferred)• Municipal collection sites

Cleanfarms' outreach to affected stakeholders focused on informing stakeholders of the recommended changes and gathering their feedback.

2. Affected stakeholders

The materials targeted by the CIPRP are a distinct group of products that are used primarily by farmers/producers. The general public does not typically purchase or use these items. Accordingly, Cleanfarms' efforts focused on engaging the following stakeholders:

- a. Farmers/producers – stakeholders who use crop inputs
- b. Stewards – manufacturers and distributors of crop inputs
- c. Municipal collection sites that currently manage containers (23L and under)
- d. Ag-retailers – collection sites that currently manage totes and drums and SPI bags. These ag-retailers also have the option of collecting containers (23L and under) under CIPRP.

2.1. *Key stakeholder groups*

The following groups were identified as high priority, key stakeholders where one-on-one outreach was needed:

- Manitoba Beef Producers
- Dairy Farmers of Manitoba
- Keystone Agricultural Producers
- Manitoba Association of Rural Recyclers
- Canadian Association of Agri-Retailers
- Fertilizer Canada
- CropLife Canada
- Seeds Canada

3. **Consultation process**

3.1. *Overall process*

- Given that significant changes were recommended, Cleanfarms prioritized one-on-one meetings with stakeholders. Meetings took place throughout the year.
- Cleanfarms has two dedicated online resources:
 - [Manitoba Stewardship Program Plan Renewal](#)
This provided an overview of the proposed changes with content that was geared towards stakeholder groups and stewards who normally weigh in on program plans.
 - [Transitioning Small Container Collection from Municipal to Retail Sites](#)
This largely focused on recommended changes to the collection network and was geared towards collection sites (existing and new) and farmers who have a hands-on role in collections. It was/is updated regularly with new information around potential phase out dates.
- Cleanfarms attended conferences and tradeshow which allowed for one-on-one conversations.
- Cleanfarms presented to relevant stakeholder groups.
- A mid-year press release was issued to draw attention to the proposed changes to the collection network. (See Appendix A).
- The CIPRP was made available on Cleanfarms' website.
- Engagement is continuing throughout winter 2023 as ag stakeholders may have some downtime during this time.

3.2. *One-on-one meetings*

While each one-on-one meeting differed, the following topics were generally reviewed:

- Reasons for the proposed changes
- Proposed timelines and process to implement changes
- Feedback mechanisms
- Ways to ensure a smooth transition for farmers

Other:

- Cleanfarms held one-on-one meetings with key staff at all of the stakeholder groups listed in 2.1.
- Cleanfarms reached out to all ag-retailers in Manitoba, either by individual phone call/email or via their head office.
- Through its regular interactions with members, Cleanfarms connected with its membership, some of whom are ag-retailers and some are stewards.

3.3. *Tradeshow and conference attendance*

Cleanfarms hosted booths at the following events:

- Solid Waste Association of North America (SWANA), April 2022
- Federation of Canadian Municipalities Conference & Trade Show, May 2022
- Manitoba Association of Regional Recyclers' (MARR's) Forum, November 2022
- Manitoba Forage & Grassland Association's Annual Meeting, November 2022
- Crop Production Show, January 2023

- Keystone Ag Producers Annual Meeting, January 2023

Note: Cleanfarms is hosting booths at the following events in February 2023:

- Manitoba Beef Producer's Annual Meeting
- Crop Connect

3.3.1. *Presentations and committee meetings*

Cleanfarms presented to the following groups:

- Canadian Fertilizer Products Forum (multi stakeholder meeting), January 2022
- CropLife Canada Board, May 2022
- Dairy Farmers of Manitoba Board, June 2022
- Manitoba Association of Regional Recyclers' (MARR's) Forum, November 2022
- Canadian Fertilizer Products Forum, November 2022
- Keystone Agricultural Producer's Advisory Committee, November 2022
- Keystone Agricultural Producer's Annual Meeting, January 2023

Note: Cleanfarms is presenting at the Manitoba Beef Producer's Annual Meeting in February 2023.

3.3.2. *Release of the Crop Input Packaging Recovery Program (CIPRP)*,

On December 9, 2022, the Crop Input Packaging Recovery Program, was made available on Cleanfarms' website.

Stakeholders were advised via one-on-one outreach and via electronic newsletters that feedback was due to Cleanfarms by January 25, 2023.

4. **Stakeholder feedback**

4.1. *Farmer feedback*

Overall, feedback from farmers indicated some hesitation around the changes to the collection network for containers (23L and under) and the importance of taking a community-by-community approach to making changes.

Additional feedback reflects the following:

- A significant change to the collection network requires changes to long standing habits.
 - For some, an ag-retail collection site could be closer to the farm. For others, it could be further and potentially lead to extra driving time or extra trips. For example, some farmers make a well-organized trip to a municipal collection site to drop off a variety of materials (e.g., household waste, cardboard) including their containers.
- Overall, producers recognized that ag-retailers are generally well trained around the proper handling of crop input packaging.
- There are mixed reactions to the new requirement around recycling bags.
- Farmers emphasized that rural community members are often very willing to work together on localized solutions that may differ from community to community. They recommended that ag-retailers and existing municipal collection sites work together to manage responsibilities around collections.

4.2. *Municipal collection site feedback*

With few exceptions, collection sites were overwhelmingly supportive of transitioning collections for containers (23L and under) to ag-retailers.

Additional feedback reflects the following:

- There was a general sense that ag-retailers should take on this responsibility moving forward because this is how it is managed in other areas of the country and ag-retailers have a commercial interest in the sale/supply of crop inputs.
- Overall, municipal collection sites understood that Cleanfarms will work one-on-one with their community to ensure a continuity of service. There was a strong willingness to extend suggested closure dates to accommodate local farmers.
- Municipal collection sites are looking for assurances that Cleanfarms will continue to collect containers that might be dropped off following the suggested closure dates.
- Some felt that the proposed changes created greater awareness of the efforts municipal collection sites put into recycling programs in their communities.

4.3. Ag-retailer feedback

Ag-retailers support the overall concept of offering end of life stewardship for crop input packaging programs to their customers. There is some hesitation around taking on new responsibilities specifically with containers (23L and under).

Additional feedback reflects the following:

- There was a general sense that each community will require a unique approach. In some cases, municipal collection sites may be well suited to offer this type of collection.
- Some ag-retailers noted that they knew ag-retailers who collected containers in 2022 and they would be consulting them to get their feedback.
- Some ag-retailers requested additional lead time to make a decision on their involvement.
- Overall, collection sites understood that Cleanfarms' intention to work one-on-one with their community. There were some specific suggestions to change some of the language used on Cleanfarms' website and in the CIPRP to reflect this flexibility.

4.4. Steward feedback

Very little steward feedback was received because most stewards are already financing/supporting programs on these designated materials.

Some stewards emphasized the importance of sufficient lead times to take on new responsibilities (e.g., reporting and remitting) and concerns that some small stewards may purposely avoid their responsibilities.

4.5. Additional observations

- Given that there are a wide variety of high-profile initiatives/consultations underway in Canadian agriculture, there may be some stakeholder fatigue around topics related to end of life stewardship. Throughout 2022, two other jurisdictions (Prince Edward Island and Quebec) introduced changes that impact stewards in similar ways.
- There may have been a misconception amongst some farmers that Cleanfarms was proposing the closure of municipal collection sites (without the addition of ag-retailers). A short conversation with staff cleared this up and allowed staff to emphasize that each community would be managed individually.
- There may be some confusion with terminology used in the CIPRP. Some individuals thought that the term 'steward' referred to a farmer and not a manufacturer/distributor/brand owner.

5. Analysis of stakeholder feedback

The bulk of the feedback received focused on the changes to the collection network, which is what Cleanfarms expected as this will require changing long-standing habits.

Given that some agricultural stakeholders may be experiencing stakeholder fatigue, Cleanfarms will continue to reach out to stakeholders after the CIPRP has been submitted to government on January 21, 2023

6. Incorporating stakeholder feedback

The latest version of the CIPRP (V02) incorporates feedback received through the consultation process:

- It better emphasizes the community-by-community approach that is being taken to transition collection sites and the flexibility that is available to communities where willing municipal partners exist.
- A section (5.2.9) has been added that explains how municipal collection sites that wish to continue to collect containers (23L and under) will continue to be serviced throughout the duration of the CIPRP.
- The collection site listing (Appendix B) lists all sites and their 'recommended phase out date' rather than a 'closure date.'

Please note that Cleanfarms is implementing a communications plan to reach growers directly via print ads, published articles in grower magazines, and social media in January and February 2023. Cleanfarms will continue to keep provincial government contacts informed on the reaction received.

List of Enclosures

- I – Questions received through the consultation process
- II – Sample of a stakeholder group sharing information about the consultation
- III – Written feedback received
- IV – Tools used through the consultation process

Enclosure I – Questions received through consultation process

Empty containers (23L and under)

1. *Why do seed treatment containers need to be stored in a separate plastic bag?*
Seed treatment containers have different processing requirements than non-seed treatment containers. Separating these two types of containers at the source prevents cross contamination and helps ensure that non-seed treatment containers can be recycled.
2. *Why are bags needed?*
Collection bags have several benefits, which include improved containment, less contamination and easier handling.

Collection site changes

3. *How will Cleanfarms handle situations where a municipal site shuts down and ag-retailers don't want to get involved?*
This will be handled on a case-by-case basis. Based on conversations with municipal officials, there is a strong willingness to work with Cleanfarms to ensure accessibility, whether for the short-term or long-term.
4. *Is this the first time this type of change is taking place?*
No. In the mid-2000s, a similar transition took place across Saskatchewan. This transition increased accessibility and there are now over 400 ag-retailers accepting container, totes and drums and SPI bags across Saskatchewan.
5. *Aren't municipal sites best suited to collect containers?*
This is difficult to answer as both municipal and ag-retail sites offer different types of amenities. Ag-retailers have high HS&E standards due to mandatory warehousing standards. Ag-retailers also have a strong 'know-your-client' mentality which lends itself well to raising program awareness and proper preparation. Some municipal sites are extremely well equipped to handle container recycling and also have helped farmers build up habits that lend well to recycling.
6. *How will Cleanfarms handle situations where farmers are too far away from an ag-retailer?*
This is where Cleanfarms will work one-on-one with the community.

For some farmers, returning jugs to retail might be more convenient as they are already headed to an ag-retailer for customer support or to drop off other items. For farmers who are a far distance from their retailer, Cleanfarms will work with their municipality to ensure that potential gaps are filled.

7. *How will Cleanfarms handle situations where a municipal site wants to continue collections?*
This is permitted and we ask these municipal sites to connect with Cleanfarms. (To date, several sites have done this.) The site will follow the same procedures/guidelines that are in place for ag-retailers.
8. *Can municipal sites also collect SPI bags and totes?*
No. These items must be taken to ag-retailers.

Totes and drums

9. *What happens with the metal cages that are around totes?*
Metal cages are smelted down and the smelt is used for a variety of metal products depending upon the industry demand at the time of processing.

10. Do farmers use a lot of totes used in Manitoba?

Cleanfarms conducted a farmer survey in 2019. At that time, nearly 50% of crop farmers reported that they used 'non-reusable bulk pesticide containers.'

Seed, pesticide and inoculant bag

11. Is the intent to capture all seed bags or just those used for treated seed?

The intent is to capture all bags used for agricultural seed in Manitoba.

12. Would feed bags be accepted?

No. Feed bags are out of scope.

While Cleanfarms is open to working with feed mills, we do not yet have any relationships with feed mills in Manitoba. Work is underway in Quebec (where feed mills will be required to develop programs for bags in 2023 and 2024), which could help feed mills in other regions explore solutions.

General

13. Are agricultural pesticide containers collected via CIPRP also regulated under the Household Hazardous Waste (HHW) Regulation?

No. The containers that are part of the CIPRP contained "commercial class" pesticides. The 'pesticides category' in the HHW Regulation captures a different class of pesticides, "Domestic". For more information about how pesticides are classified, click [here](#).

14. Would pallets or pallet wrap be included in this type of program?

No. The CIPRP does not include pallets, pallet wrap or other types of transportation packaging.

15. What about sharps? Are they part of the CIPRP?

No. The CIPRP does not include sharps.

Enclosure II – Sample of a stakeholder group sharing information about the consultation

Manitoba Association of Rural Recyclers

Source: Email sent January 11, 2023

Subject: MARR Exclusive - Important News and Info for MARR members - Jan 11, 2023 Edition

Happy New Year MARR members!

We hope you had a wonderful Christmas and Holiday break. Just a few things to share with you as we start to get back into the swing of things. (Remember, some of this information will be posted at MARR website but some is being shared exclusively with MARR members so remember to pass this along to your colleagues)...

1. We'll announce more of our upcoming events shortly. In the meantime, don't forget to mark your calendar for the following event(s):

- **Oct 24-25, 2023 - 2023 MARR Forum (Viscount Gort Hotel & Conference Centre, Winnipeg)**

2. Attached for your information - Cleanfarms' Container Recycling Program: Manitoba Municipality Information Package - Cleanfarms has announced changes to the Container Recycling Program & Transition Plan for Collecting Jugs at Retail and has asked us to share a copy of the Manitoba Municipality Information Package. See attached.

3. Upcoming Consultations on Manitoba's PRO programs – A number of Manitoba's Producer Responsibility Organizations will be consulting on their program plans between now and June 2023. MARR encourages all communities, recycling service providers and interested stakeholders to attend any information webinars organized by the various PROs and full participation in these consultations. We will be sharing announced dates below along with general information on how to join.

- **January 20, 2023 (noon to 1pm)**– MARR members are invited and encouraged to attend a FREE information webinar detailing the renewal of Manitoba Stewardship Plans of four PROs including: Thermostat Recovery Program (TRP), Canadian Battery Association (CBA), Call2Recycle, and the Health Products Stewardship Association (HPSA). This free webinar runs on January 20, 2023, from noon to 1:00 p.m. CST. It will feature four short and informative presentations from each PRO. To register for the webinar [click here](#).

- **Deadline: January 25, 2023** – Cleanfarms' government-approved Stewardship Program Plan for empty pesticide and fertilizer container recycling is up for renewal in 2023 and is now available for public comment. The plan outlines how the program will be transitioned to a 100% industry funded model with notable changes to the types of materials accepted and to how the collection system will operate. More details are available at <https://cleanfarms.ca/manitoba-stewardship-program-plan-renewal/>. **Comments on the plan are due to Cleanfarms by January 25, 2023.**

4. Reminder too that SWANA Northern Lights has a number of upcoming courses that may be of interest to your team, including:

- In-person training will be held in Winnipeg which will include:
 - o Landfill Fire – January 31, 2023
 - o LOB – February 1 & 2, 2023
- A number of online training opportunities have also been announced, including:
 - o Landfill Operations Basics (LOB) – online – December 12 & 13, 2022

Enclosure III – Written feedback received

Excerpts from emails received from ag-retailers:

Note: At the request of some individuals, Cleanfarms has removed personal information and specific locations.

'I have been in contact with my local RM. We tried the collection program last year to see how it would go and so far I'm not in favour of it and will probably not continue. As an ag-retailer, my main concern is potential contamination and ensuring high standards for our site and employees. We already have an RM collection site that is well used in our area. The response that I've received from a majority of our clientele is they would prefer to use the existing site. There has to be a better solution for this community.'

'I help support multiple ag-retailers across Manitoba and I have concerns about the changes to the storage and collection locations for the 23L and under jugs.

Some of the collections sites in our area have already closed and others are listed for closure in December of 2023 and 2024.

We currently participate in the Clean Farm Program and have been sending back the empty drums and totes to be recycled safely. We started handing our bags two years previous for our customers to safely return all rinsed chemical jugs to the local RM and Municipal collection sites. I do believe that this was a good system. The sites have posted hours, staff on site to ensure jugs are bagged rinsed and put in the selected area and also have a fence to ensure that the jugs will not be tampered with while the site is not open.

My concern is that many ag-retailers do not have an area to store the jugs. Some of our locations are also in towns and I do not feel that is a good location for a community to have a pesticide collection site. I'm concerned about health & safety of our employees, our property and others. My request is to extend the closures till December of 2024 so that this process can be reassessed to come up with the best solution for the environment.'

'I am writing about the changes to CleanFARMS and collection network for containers (23L and under) in Manitoba for the consultation period. I am a grain farmer and work for a retail.

The current collection site for used pesticide containers, located in our RM is well maintained and easily accessible during operational hours. In my experience as a farmer, many of my neighbours use the facility to safely dispose of used containers. Any time, when I am visiting the waste disposal site from May to October, there are at least two to three farms at the fenced collection site, unloading their jugs. From my perspective in retail, many customers use the site because of convenience and understanding of the sustainability aspect versus older practices. Changing the location of the site is not necessary when we have maintained, well used and easily accessible locations like this one.

Our RM does not agree with the closure of the municipal site and moving to a retail site. Some of the reasons for maintaining the status quo are that farms are used to the location and hours and there is good uptake; the site is monitored to ensure that only pesticide jugs are disposed in the enclosure; when gates to waste disposal site are closed and locked, there is no access for un-monitored dumping.

Some retailers are concerned about potential unmonitored dumping. This is especially concerning for retailers that are in town or on highways. If municipal sites are enclosed, monitored and away from where the general public then they are likely more suitable than retailers.

I know that there are people like me who can help educate farmers to ensure safe practices take place at pesticide container sites that are located at waste disposal grounds. This avenue needs to be explored further.'

'Retailers should get paid for this new work.'

'There is some confusion about who is taking jugs – retailers or municipalities. I know my retailer takes chemical in the fall. We need a clear understanding of where we are to take our jugs. If these programs aren't laid out for convenience, few will bother to use them.

'One thing that would make a great positive impact is to redesign the collection bags so they have a better system to seal once filled to prevent opening to prevent jug loss and rainwater entry.'

Enclosure IV – Tools used through the consultation process

Cleanfarms website:

Dedicated web portal: <https://cleanfarms.ca/manitoba-stewardship-program-plan-renewal/>

The screenshot shows the Cleanfarms website header with the logo and navigation menu. The main heading is "Manitoba Stewardship Program Plan Renewal". The content area features a green box on the left stating: "Cleanfarms' government-approved stewardship program plan for empty pesticide and fertilizer container recycling is up for renewal in 2023." To the right, it lists two key changes: "Farmers can turn in a wider variety of designated materials for recovery" and "Changes are underway to the collection network for containers (23L and under)". Below this, it notes that these changes will provide a single collection point and transition to a 100% industry-funded model. A call to action states: "Comments are due to Kim Timmer by January 25, 2023." On the far right, there is a thumbnail of the "STEWARDSHIP PROGRAM PLAN FOR DESIGNATED CROP INPUT PACKAGING" document with a table of details:

cleanfarms	
Jurisdiction	Manitoba
Regulation	Plastic and Pesticide Paper Stewardship Regulation (PSPSR)
Submitted to	Environment, Climate and Parks
Version	v11 - released for public consultation
Date	December 9, 2022
Consultation period	December 9, 2022, to January 25, 2023
Program duration	July 1, 2023, to June 30, 2028
Primary contact	Kim Timmer 877-244-6774 ext. 202

Dedicated web portal: <https://cleanfarms.ca/manitoba-stewardship-program-plan-renewal/>

The screenshot shows the Cleanfarms website header with the logo and navigation menu. The main heading is "Transitioning Small Container Collection from Municipal to Retail Sites". Below the heading, it specifies "Alberta & Manitoba – 2022 to 2024". The text explains: "Between 2022 and 2024, the <23L container collection program will undergo a gradual change that will align it with other provinces, enabling farmers to bring back these containers to their local retail outlets." It further states: "The change is being phased in gradually to reduce the burden on retail and municipal services, and to increase convenience for farmers who can now bring the containers back to the retail outlets that they frequent." A "Thank you!" message follows, thanking municipal collection partners. On the right, there is a graphic with the text "BRING 'EM ALL BACK" and "Return empty ag jugs to retail" and "Call for hours of operation". Below the graphic, it says: "All municipal ag jug depots to close by December 31, 2024".

Sample presentation slides





Who is Cleanfarms?

Since 2010: Industry led & funded stewardship

Cleanfarms/AgriREcup

- Canadian non-profit industry stewardship organization committed to environmental responsibility through proper management of ag plastic waste

~80 members

- Pesticide, fertilizer, seed, animal health medication, ag plastics industries

Operating recycling programs for farmers from coast to coast

ADAMA	Advantage	AgroCity	AgriREcup	AGRO	AgriSolutions	ALBAUGH	ALPAC
AMITY	YAMVAC	Andermat	VATP	BASF	BAYER	BELOHM	Berry
Bayer	BretVigas	bridon	Case IH	Cargill	Ceresco	CO-OP	
Committed	CORTeva	CropLife	FBN	fertili	FLAMAN	FMC	EDGE HARVEY
Gowat	HELEN	Hessell	HORIZON SEEDS	Intelligo	IPCO	INGRESS	KOCH
maxx	MOORE	Noerrata	NOVUS	NOVUS	NORAC	NOVUS	Nufarm
NUTRIAG	Nutrien	OMEX	Optima	PLANTVITALITY	PRECISION	PRO	Pro Ag
Prograin	PRISearch	Redhead	SEXTON	Reliance	RICHARDSON	KS AGRI-TRAC	SeCan
Share Canada	SPCAN AGRO	Solo Agriculture	Stellar	strongarm	synAgri	syngenta	Tamara
SHINDLER	Univer Solutions	UPL	VALANT	WILK	william houde	WINTFIELD	WOODSTREAM
YARA							

Our Vision:

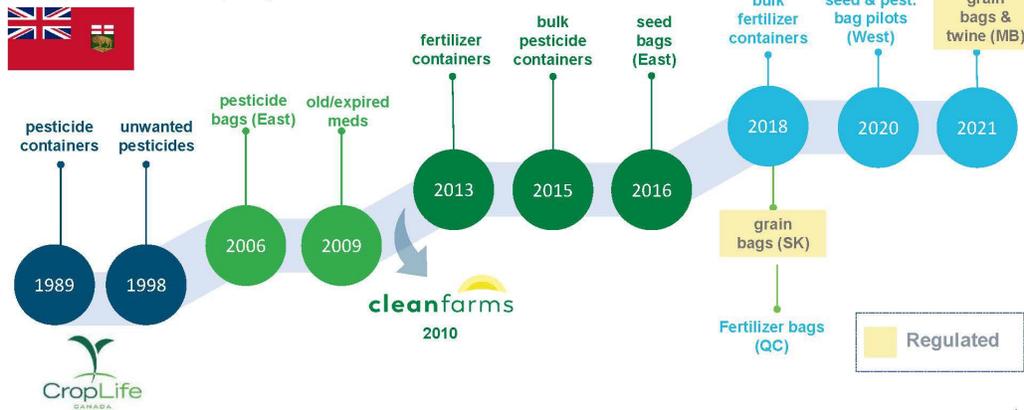
Cleanfarms contributes to a healthier environment and a sustainable future by recovering and recycling agricultural and related industry plastics, packaging and products.

Approach:



Cleanfarms: Canada-wide program history

Important date:
January 2023 – Stewardship Program Plan renewal

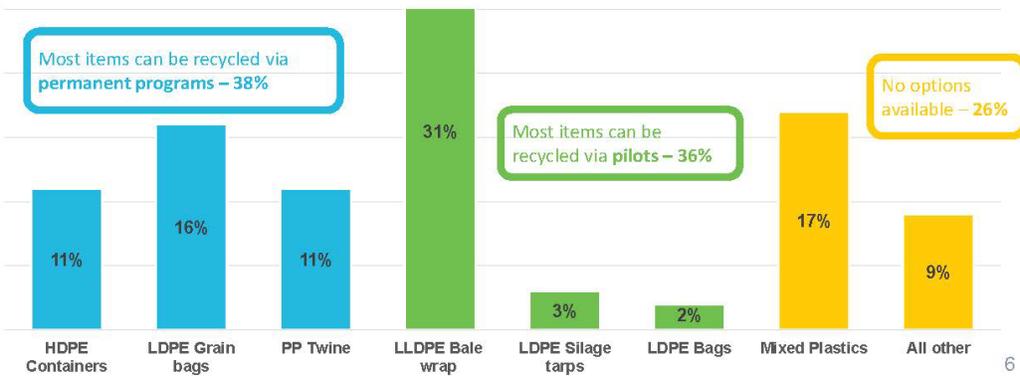


... Keeping used plastics and packaging off of Canadian farms



Manitoba farmers use approximately 4,700 tonnes of ag plastics annually

- Programming availability varies by material



Ag-retail Collection Partners



Pesticide & Fertilizer Drums and Totes



Unwanted Pesticides & Old Livestock/Equine Medication



Seed, Pesticide, & Inoculant Bags (small and large)

Municipal Collection Partners



Pesticide & Fertilizer Jugs



Bale and Silage Plastic (Funded by DFC)



Baler Twine



Grain Storage Bags





- Contamination and correct preparation
 - Keeping materials separate at farm level, at collection site level and at consolidation (baling)
- Logistics
 - Specialized collection and transportation required; not many service providers
 - Large volumes on-farm; convenience is important
- End markets for recycled materials
 - No technical barriers to recycling most materials, but recyclers need customers!
 - Net wrap has no recycling option today



Signage is a vital comms tool

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 - Keeping materials separate at farm level, at collection site level and at consolidation (baling)
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AG-PLASTICS MANUAL BALER MADE WITH RECYCLED PLASTICS

CAUTION! BEFORE OPERATING

Check ground conditions in yellow areas to be sure ground is firm and level with safety pins before loading. **Never use in open ditches.**

OPERATING INSTRUCTIONS

1. PREPARING PLASTIC - (4' x 8' SQUARES)

Stack plastic sheets and lay flat. Find A-frame size of water troughs. Fold strips into 6' squares. Fold sheet ready for loading.

2. LOADING PLASTIC

Position 4' x 8' folded plastic. Position 6' x 6' rolls of Netwrap (if required). Secure front and clean with pins. Insert plastic sheets alternating direction.

3. COMPRESSING BALE

Position 6' x 6' square plastic. Lower 6' x 6' roll around corner of plastic. Drive up which side & attach back. Compress with clean front.

4. FINISHING BALE

Open front/clean & attach with Netwrap. Roll on 6' roll with safety pins. Attach back before roller to attach and lower back until 6' roll and entire is pulled.

- **Contamination and correct preparation**
 - Keeping materials separate at farm level, at collection site level and at consolidation (baling)
- **Logistics**
 - Specialized collection and transportation required; not many service providers
 - Large volumes on-farm; convenience is important
- **End markets for recycled materials**
 - No technical barriers to recycling most materials, but recyclers need customers!
 - Net wrap has no recycling option today

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- Ensure that stakeholders have an opportunity to provide input into the development, ongoing execution and effectiveness of Cleanfarms' programming in Manitoba.
- **Launch: early 2023**
 - Following one to two years of program performance
- **Composition - Key stakeholder groups whose members are impacted by Cleanfarms' programs**
 - One in-person meeting per year
 - Most groups assign a member and a staff person (back up)
- **Typical duties:**
 - Provide advice/recommendations
 - Review program performance
 - Assist with promotions & education

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Stewardship Program Plan Renewal – Key changes

• Additional materials

▪ 2018 – 2023:



▪ 2023 – 2028:



• Shift in collection locations

100% industry funded model

Harmonization

One-stop for crop input packaging



Return empty ag jugs to retail Call for hours of operation
All Manitoba municipal ag jug depots to close by December 31, 2024

• Deadlines

▪ Public consultation – December 2023 – January 2024

Remember! Unwanted Pesticide & Livestock Medication Collection October 24-28

Farmers! Got unwanted pesticides or livestock/equine medications?

Safely dispose of unwanted or obsolete agricultural pesticides and livestock/equine medications – **no charge!** Take them to the following locations on the dates noted between **9 a.m. and 4 p.m.**

ARNAUD

Thursday, Oct. 27
G J Chemical Co. Ltd.
96 Smith Ave West
204-427-2337

BALDUR

Friday, Oct. 28
Baldur Agro
121 2nd St
204-535-2598

BEAUSEJOUR

Wednesday, Oct. 26
Nutrien Ag Solutions
72010 Road 40 off Hwy 44
SE 10-13-7E
204-268-3497

BRANDON

Thursday, Oct. 27
Richardson Pioneer
14 km west on Hwy 1,
then 1/4 mile south on
Pioneer Rd.
204-727-5353

BRUNKILD

Monday, Oct. 24
MK Agro
3062 Road 39 NW
204-736-4769

DAUPHIN

Monday, Oct. 24
Dauphin Co-op AGRO
601 Wilmore Ave E
204-622-6080

DELORRAINE

Monday, Oct. 24
Nutrien Ag Solutions
Hwy 3 S Broadway St. S
204-747-2877

GLADSTONE

Monday, Oct. 24
Neepawa-Gladstone Coop
Road 69, Hwy 16
(4 miles W of Gladstone)
204-385-2906

INGLIS

Wednesday, Oct. 26
Prairie Giants Crop Supply
2 km East of Hwy 83 on
R9 366
204-564-2293

MEADOWS

Thursday, Oct. 27
Ag Advantage Ltd
68156 Road 6 W
204-322-5351

MELITA

Thursday, Oct. 25
Cargill
7 km SW of Melita on
Hwy 83
204-522-3221

PORTAGE LA PRAIRIE

Friday, Oct. 28
Portage Agri-Sales
11 Can-Cut Dr
204-857-7838

RIVERS

Friday, Oct. 28
Redfern Farm Services
102 2nd Ave
204-328-9325

SHOALAKE

Thursday, Oct. 27
Shur-Gro Farm Services Ltd.
236 Industrial Park Rd.
204-759-4240

ST. LEON

Thursday, Oct. 25
Pembina Coop
49079 Road 25N
204-744-2850

STANLEY

Wednesday, Oct. 26
Cargill
12137 Road 25W
204-325-9551

STEINBACH

Friday, Oct. 28
Clearview Coop
33124 Road 39 N
(at Hwy 12N, between
Steinbach and Blumenort)
204-326-9921

SWAN RIVER

Thursday, Oct. 25
Cargill
2 miles south on Hwy 83
204-734-5747

TELUON

Thursday, Oct. 25
Willis Agro
11034E Road 95N
204-461-0386

VIRIDEN

Wednesday, Oct. 26
Core Ag Inputs
320 Chester St. E
431-763-3536

Partner



* Next Cleanfarms collection in these areas in 2025.

* For collection dates elsewhere, go to: cleanfarms.ca/materials/unwanted-pesticides-animal-med/

Help us spread the word:

- October 24 – 28, 2022
- Next collection: 2025



Your Manitoba-based resource: Serena – MB Program Coordinator
klippensteins@cleanfarms.ca | 204-390-8850