



KEYSTONE AGRICULTURAL PRODUCERS

November 27, 2025

Proposed Changes to the Packaging and Printed Paper Stewardship Program

Keystone Agricultural Producers (KAP) is Manitoba's general farm policy organization, providing a unified voice for farmers on issues that affect agriculture. KAP represents and promotes the interests of all Manitoba farmers and 20 commodity associations.

Farmers depend on plastics for their operation, and Cleanfarms plays an important role in ag plastic recycling. Recycling is a shared responsibility. Farmers want not only an ag plastic recycling program but also a program that meets their needs. Industry, agricultural associations, farmers, and Cleanfarms all play a role. KAP supports ag plastic recycling and is pleased to provide comments about proposed changes to Cleanfarms' stewardship program.

The proposed change would add an environmental handling fee to bale wrap, silage bags, and silage bunker covers and tarps. The change may create challenges. (1) Farmers have encountered rising input costs and decreasing commodities prices (for some commodities). Adding new costs for some agricultural products increases this financial burden. (2) Existing EHF on twine and grain bags have not translated into strong recovery rates. A Cleanfarms' central pillar involves increasing recycling participation, but uncertainty exists as to whether an added producer costs will generate higher participation. E.g., the Cleanfarms 2025 Manitoba survey shows that 90 percent of farmers do not recycle their twine while 37 percent recycle their grain bags—two plastics that already have an EHF. How can Cleanfarms increase recovery rates? No simple solution exists. And KAP remains doubtful that creating additional EHF would lead to higher recovery rates. Rather than implementing the proposed EHF in 2027, KAP recommends that Cleanfarms maintain the current system, focus on education, improve collection site accessibility, and research into the barriers farmers face in recycling.

Thank you for the opportunity to comment on the Proposed Changes to the Packaging and Printed Paper Stewardship Program. If you have any questions about these comments, please contact KAP policy manager, Neil Van Overloop, at neil.vanoverloop@kap.ca

Sincerely,

Colin Hornby

General Manager, Keystone Agricultural Producers Inc.