

**RECYCLEBC™**

# 2017 Consultation Report

Published February 28, 2018





Dear Stakeholders,

Thank you to all our partners for being part of our consultation process.

We really appreciated the active and engaged participation we received at our consultation last November. Over the course of the two-day consultation, nine workshops were led by the Recycle BC team and time allocated for questions, ideas, views, and comments on the workshop topics as well as other subjects important to our stakeholders.

We received important and authentic feedback, questions and concerns and will consider these as we move into the next stages of the revised program plan development and creation of the new collector agreements.



We value our partners and appreciate you being part of and contributing to the process.

Thanks again for your feedback,

Kind regards,

**Allen Langdon**

Managing Director, Recycle BC



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## Overview

In November 2017, Recycle BC hosted a consultation session over the course of two days. The consultation brought together collectors, representatives from government departments, industry stakeholders, other stewardship organizations, educators, community champions and others. The two days involved extensive discussion about Recycle BC's proposed changes to its Program Plan, Master Services Agreement, Statements of Work and collection payment framework. It also included various activities and opportunities for stakeholders to ask questions and provide their feedback. Recycle BC is committed to listening to the views of its stakeholders and doing its best to ensure those views are taken in to consideration when changes are made to the Recycle BC program as it continues to evolve.

Participants were solicited for feedback through the following channels:

- Pre-consultation survey
- Activities during the event including: group workshops, comment boards, webinar questions, Q&A sessions
- Post consultation feedback period (Written Feedback Period)

This report is a summary of the feedback we received from our stakeholders during and after the consultation session. Recycle BC will be responding and addressing comments moving forward in the development of the Program Plan and new collector agreements and incentive packages.

Recycle BC felt that the consultation period was an effective way to receive feedback from stakeholders and was a successful process overall. There was active participation at the consultation event and a wide range of thoughts and opinions came forward. Recycle BC found its stakeholders to be collaborative, constructive, direct and inquisitive.

How feedback has been captured and summarized for this report:

We have made every effort to capture the wide range of comments and questions we received, while also striving to keep this document concise. In some cases, we have summarized feedback where it is similar to other comments. Some comments are marked as having received "votes of agreement", referring to some of the feedback activities during the consultation session, such as voting exercises. "Repeated comments and submissions" refer to feedback received in letters and online submissions during the post consultation period. Some comments have been moved from a workshop where it was made to a separate workshop page that better suits the topic, or overlaps with similar comments reflected in that workshop.



## Recycle BC Consultation Process

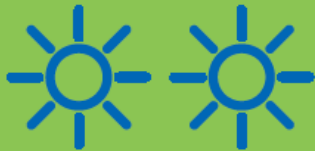
Following is a summary of the stages of the consultation process and the development of the revised Program Plan, Master Services Agreements and Statements of Work.



## Recycle BC Consultation Participation

### ABOUT

**2** days



**9**

workshop  
topics



**18**

workshop  
sessions



### PARTICIPATION

**137**

organizations

**24 of 29**

Regional Districts  
represented  
(by local governments and  
contracted collectors)

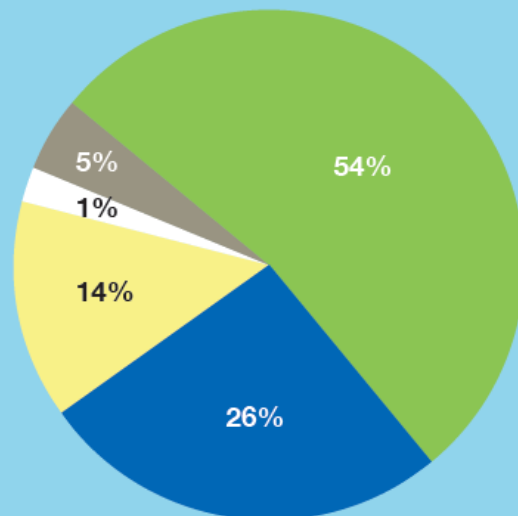
**253**

attendees

222 in person/ 31 via webcast

#### Sectors represented (by individuals attending in-person):

- **120** Local Government/  
First Nations collectors
- **58** Private collectors
- **30** Other  
(includes Ministry of  
Environment,  
post-collection partners,  
stewardship agencies,  
consultants, residents)
- **2** Member businesses  
(stewards)
- **12** Education/non-profit/  
community



### ENGAGEMENT

**900+**

questions  
and comments  
recorded at the  
consultation

**46**

online feedback  
form submissions



**10**

formal letter  
submissions





## Program Plan – Workshop Feedback

### Workshop Purpose

- Discuss the proposed updates to the Program Plan, beyond those identified in other workshops.
- Provide stakeholders the opportunity to give feedback on the current Program Plan and proposed updates to the Program Plan.
- Discuss opportunities to improve efficiency and effectiveness in the delivery of the Recycle BC program.

### What We Heard at the Consultation Session and During the Written Feedback Period

#### The Consultation

- Recycle BC's strengths include good staff, good planning when taking on direct service, good consultation.
- Expectation that consultation feedback is seriously considered and that any changes take into account the many challenges facing rural and un-incorporated communities.
- Requests for more time for consultation. Insufficient time to consult with politicians and member municipalities. No board/council during summer. Not enough time to November 2018 decision process, compounded by an election year.

#### Program Expansion and Concerns for Rural Areas

- The standards for curbside program expansion and minimum population threshold for new curbside service areas severely restrict rural areas and exclude unincorporated areas.^\*
- Would like to see clear and transparent criteria on how/when/who/what for new service area expansion into the program, and specified timelines for waitlist community inclusion.^\*
- Recycle BC takes the position of delivering the program to those communities which make the most economic sense from a business delivery perspective. We counter that Recycle BC is ultimately funded by British Columbians who all deserve fair access to the program.^
- Recycle BC's business model is urban (quantity) biased. Most rural areas won't make profitability threshold. Yet the resident has paid the recycling levy and the tipping fee as the material inevitably ends up in the environment (landfill).^
- 75% of provincial capture does not accommodate need of rural settings. Different standards are needed for urban and rural areas. Current "adequacy" standards exclude rural needs.^
- If Recycle BC wants to be in charge of "appropriate" service levels, performance needs to be assessed on a regional level, not provincial.\*\*
- Requests for the allowance of satellite depots to service rural areas as a way for the program to evolve.\*
- Get out of the way of small communities that want to recycle. They want to improve their communities. They do not want your bureaucracy.
- Some of our Regional District's municipalities are included in the program, while some are not. We've seen confusion among residents in smaller areas who self-haul and small contractors using

\*Several votes of agreement at consultation session.

^ Repeated comment and/or submission.

\*\* High number of votes of agreement and/or consistently repeated comments/submissions.

nearby municipal facilities who aren't under the Recycle BC education banner, and haven't received information about requirements at the facilities. How can Recycle BC better address this issue and future changes to the program that must be communicated more broadly?

### Packaging Design & Recovery Rates

- The program plan should include focus on packaging and printed paper (PPP) redesign to facilitate use and volume reductions, as well as designing for recovery rather than recycling only, as required in section 5(3) of the BC Recycling Regulation.^\*
- Recycle BC must collaborate with the Province to include institutional, commercial and industrial (ICI) material in the program, as well as non-PPP recyclable materials. This will also help reduce confusion amongst residents.\*\*
- Higher fees needed for hard to recycle materials to encourage product re-design.\*\*
- Calls for the creation of initiatives to drive reduction, reuse and recycling of single-use items such as: collaborating with producers to expand extended producer responsibility (EPR); education and behavior change programs; cup, container and bag exchange programs.\*^
- Recovery target should exceed 75% for specific materials, particularly those that are present in the largest quantity and/or have most persistence in the environment.
- EPR is supposed to change packaging choices of producers. This hasn't happened yet.
- Packaging producers need to be present to understand what's good/bad about their packaging, need for re-design for recyclability.\*
- Fee for companies choosing laminate packing is only marginally higher than that for plastic film or PET (Polyethylene terephthalate), for which end-markets exist, materials are accepted and management costs exist. Program pricing should be set to disincentivize packaging which has "no commercial technology available to recycle at scale."
- Please provide recovery rates by material (relative % and absolute tonnes). PPP stewardship programs in other provinces publish this annually and use it to calculate material-specific fees. This information would allow us to measure our progress in BC and allow members to report out against the targets they have set, while equipping them with information to address consumer inquiries.\*^

### Long-Term Plans

- We understand Recycle BC can only present 5-year plans but we assume there is a 25-year vision. The Province has a Solid Waste Management Plan template for a 10-year plan with a vision of 25 years. Recycle BC is a significant partner for any regional district in BC, therefore when a regional district is planning their infrastructure, diversion goals or strategies, how are those valid if Recycle BC may change its direction every 5 years? What is Recycle BC's vision going forward for expanding recyclables from PPP to other items.
- Is Recycle BC willing to make a commitment to review the recovery rate in 2 years?

### Other Requests & Initiatives

- Proposed changes discussed incentives for more tonnage received. However, in our regional district's Solid Waste Management Plan we are asked by the Province to look into reducing before

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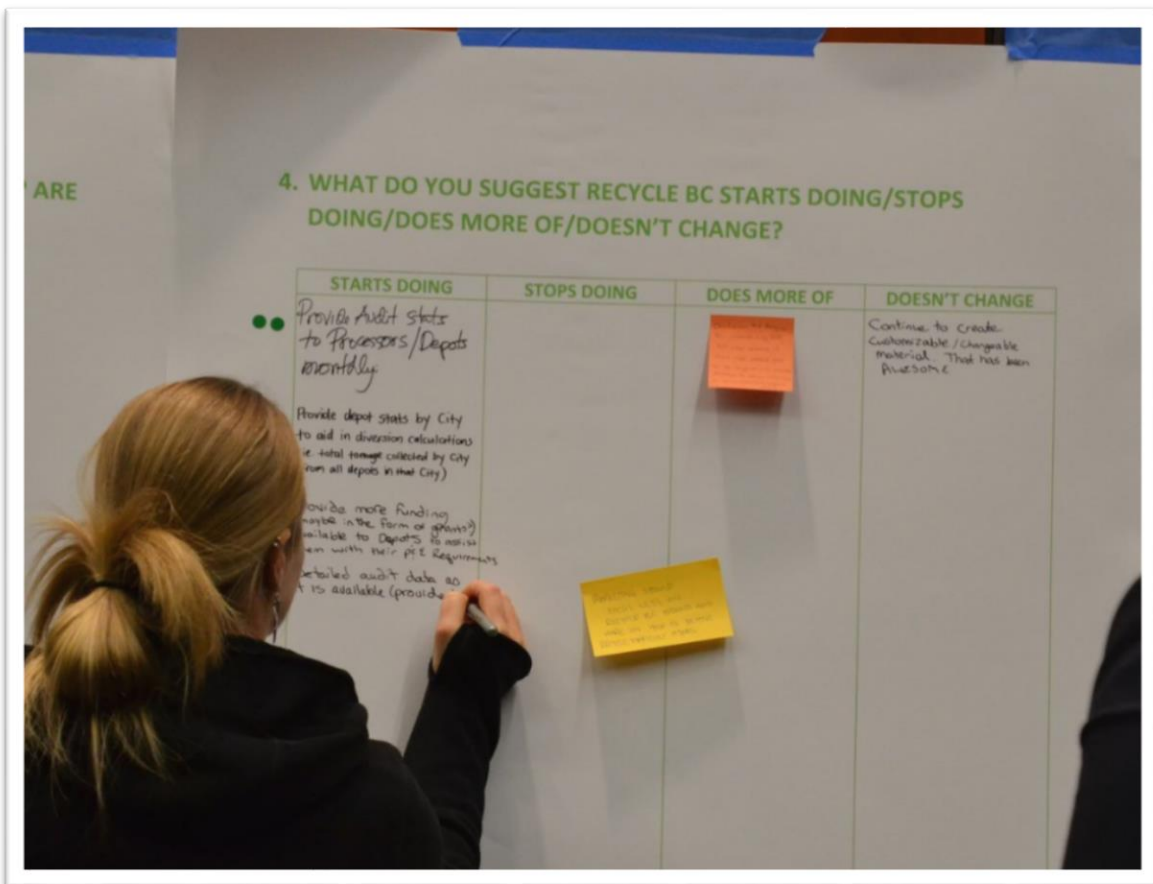
^ Repeated comment and/or submission.

\*\* High number of votes of agreement and/or consistently repeated comments/submissions.



considering recycling. Why not incentivize both reduction and recycling based on the region's yearly study?

- Need to acknowledge costs incurred by local governments. Inequitable disbursement of services cause local governments pay for recycling services; in these communities, residents are essentially paying for services twice: point of sale and utilities.
- Please use data to justify changes. We want to understand how data are extracted, and how Recycle BC arrived at its proposals. Repeated questions about baseline figures, and comments on human behaviour.^\*
- Would like to see more information on best practices internationally.
- Would like to see funding of audits at landfills to see how much PPP is still going in to garbage.
- Would like to be able to order materials online (such as oops stickers).
- Further investments in technology are needed.
- Transporters need to be in this discussion to be aware of the local government's concern over timely servicing. The longer material stays on site the greater the likelihood of deterioration.
- Develop a recycling program for frequent contaminants such as propane tanks.
- Would like an app that could scan the UPC code on a product and indicate what it is, and where to recycle it.



\*Several votes of agreement at consultation session.

^ Repeated comment and/or submission.

\*\* High number of votes of agreement and/or consistently repeated comments/submissions.

## Curbside Collection – Workshop Feedback

### Workshop Purpose

- To discuss proposed changes to the Master Services Agreement (MSA) and Curbside Statement of Work (SOW) for local government and First Nations collectors.
- To discuss proposed changes to the curbside payment framework and incentive rates for LG and First Nations collectors.

### What We Heard at the Consultation Session and During the Written Feedback Period

#### Incentive Rates

- Financial incentives do not cover costs of recycling collection services.\*\*
- Incentive rates should be indexed annually, based on the Consumer Price Index to better reflect the rising costs of collection services.^\*
- Would like incentives for cart maintenance.
- Support proposal of collection fee structure being based on container type, not just material stream. This is a more accurate reflection of operational costs.
- Incentive rates for single stream collectors using automated carts shouldn't be so much lower than other container types. Consideration needs to be given to mobility, or flexibility to include new mobility costs. Automated carts also require maintenance costs.
- Despite multi-stream collection providing cleaner products and no apparent decrease in volume compared to single stream, compensation levels don't meet costs. Recycle BC could provide multi-stream collection with additional compensation^ and/or provide an incentive bonus based on contamination levels in addition to the existing incentive bonus that merely favors volume. Perhaps require greater promotion and education expenditures for single stream automated.
- Continued inequity between multi-stream and single stream collection methods provides further impetus for multi-stream municipal collectors to consider exiting the program and moving to the direct service model, or investigating cheaper single stream systems.^
- Consideration should be given to linking increases to collection methodology rather than container type since a collector could be using carts in a semi-automated system, where lids are opened and contents inspected. Increases should not be based simply on number of streams.
- We would prefer to see an all-in cost recovery structure rather than top ups for education, service administration and depots.

#### Top-up Payments

- Should be maintained or increased rather than reduced given that new service requirements will result in additional administrative work.\*^
- Should be the same regardless of whether collection is carried out in-house or via contractor. Providing lower compensation to communities with contracted service doesn't reflect that contractors' admin costs are passed on to local government through contract fees.

\*Several votes of agreement at consultation session.

^ Repeated comment and/or submission.

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- Education and Administration top ups should be offered to organizations who subcontract with Recycle BC directly. They do comparable levels of work to local government subcontractors, but do not receive compensation for it.
- Requiring education top ups be used for associated (promotion and education) activities is overly restrictive since local governments are motivated to serve public with other blended activities. This will add administration costs.
- Education incentives should be based on automated versus manual collection trucks.
- Education rates are too low to lower contamination.

### Bonus Structure and Rates

- Request that performance bonuses be adjusted to reflect universal reduction in capture rates of kilograms per household, due to lighter material weights.^
- Regarding the development of a methodology to net out non-PPP and commingled glass for bonus payments: we are paying for contamination through a separate mechanism in the contract (penalties), seems that Recycle BC is double dipping.^

### Receiving Facilities

- Assist local governments in paying for transportation when its part of its service area are more than 60 km to the applicable receiving facility location designated by Recycle BC or propose an alternative that takes some of the financial burden from local governments.^
- About 50% of the homes our regional district services are further than 60km to the applicable receiving facility location designated by Recycle BC. Recycle BC should use distance from home as the boundary line, as the boundaries are not a fair representation of where the actual collection service takes place.
- Request for additional funding for our recycling centre which is used as a transfer point to get curbside material to the processor. Part of this process involves regional district operations staff collecting material for Recycle BC audits. It's not feasible for municipalities to haul curbside material to the processor beyond our regional district.
- Concerns about wait times at receiving facilities, which can be up to an hour during busy times. Would like busy facilities to have inbound and outbound scale to ensure traffic flow.
- Issues with inadequate storage space to keep materials dry at receiving facilities; should have compensation for storing materials until Green by Nature (GBN) sends hauler.\*
- Requiring drivers to assist with cleaning up bulk-head failures or cross contamination at receiving facilities must only occur in the case of driver error. Such failures may result from driver error, mechanical damage or equipment design.
- It's unreasonable to ask drivers for assistance in cleaning up bulk-head failures, they have no time.
- Requiring advanced approved of voluntary consolidation of material can be a cost issue for collectors so should be at their discretion unless Recycle BC will provide cost impacts.

### Logo Requirements

- Various objections to requirement to include Recycle BC logo on additional collection containers expressed: concern about future Recycle BC logo changes or closure; residents look at containers to

\*Several votes of agreement at consultation session.

^ Repeated comment and/or submission.

\*\* High number of votes of agreement and/or consistently repeated comments/submissions.

determine who provides the service; goes beyond contract to life of product; collectors have purchased containers, Recycle BC should include a payment for their logo on containers; want to avoid confusing residents by giving them impression that all materials can be recycled in containers.\*^

- Carts are typically interchangeable amongst the various waste streams. The requirement to approve hot stamps and design features will have a significant impact on cart managements operations and increase costs.^
- Preferred use of logo stickers instead of hot stamps.^\*

### Promotion and Education

- Rather than requiring advance approval of promotion and education materials, we would prefer Recycle BC work with collectors to review and develop applicable material instead of mandating approval.^
- Concerns about turnaround time for approval from Recycle BC. Requests for response times to be established to avoid delays.^\*
- Please ensure terms of reference for conflict resolution is captured in the agreement, in the event there are disagreements in acceptability of promotional material.
- Collection drivers also need to be educated on contamination and help enforce at the curb; this can be a challenge if not all drivers are willing to help educate residents.

### Transition from Single-Use Bags

- Several concerns about logistical and financial requirements of this transition:
- Will require transitioning from split truck with manual loading bi-weekly to weekly automated carts pick-up, doubling our collection efforts and costs.
- Requirement to purchase, distribute and maintain expensive new collection equipment and materials. Who will pay for this?^
- Reviewing material through clear bags at the curb reduces contamination. Open bins require a significant amount of plastic to create, are not recyclable, and contribute to littering. Most residents put out more than one bin per collection.^
- Concern with how current 7-year contract, based on the current bag system, will be impacted.
- Our community has voiced its opposition to this. Elderly citizens find carts cumbersome. We believe this will drive residents to place recyclable items in the garbage.^
- We don't support elimination of a solution that has lower operational and capital costs than carts or blue boxes with similar or better diversion and contamination rates.
- Investing in bag breakers or additional sorting staff to help deal with complications caused by bags at recycling facilities would be cheaper than implementing cart or blue bin programs.
- Streams and bag/bin types shouldn't be mandated. Research should help inform these choices. Request to see some studies.^
- Some participants/submissions in favor of phasing out blue bags.^

\*Several votes of agreement at consultation session.

^ Repeated comment and/or submission.

\*\* High number of votes of agreement and/or consistently repeated comments/submissions.

### Contamination Thresholds

- Regarding introduction of thresholds: In the absence of data related to cross-contamination it is difficult to determine the significance of this issue and related threshold rate. Questions about how such thresholds will be substantiated and measured and how collectors could challenge findings.
- Concerns that newly introduced defined thresholds should instead be incentivized through bonuses.
- We wish to further discuss with Recycle BC matters related to contamination threshold of 3% and related penalties, split weight loads, audits, and provisions for not collecting PPP in inclement weather conditions.
- Regarding proposal to include glass deposit containers in calculation of total comingled glass rate. This is overly punitive. If required, appropriate remuneration must be provided to the collector.

### Approval of Policy on Tagging

- Rather than approval of policy on tagging, we would prefer that Recycle BC work with collectors to determine the best approach for individual communities.
- Recycle BC should research and develop best practice approach to ensure that education through tagging and non-collection of contaminated carts is successful and results in behavior change.
- Our City is not supportive of this requirement. We have already been using “oops stickers”. Letters are also being sent to residents informing them of contamination.
- Some respondents supportive of tagging policy, but not reporting. Others supportive depending on the amount of work involved.

### Other Comments

- Many proposed changes are overly prescriptive, such as requiring approval of a policy on tagging contaminated material, requiring approval of a detailed transition plan for changing container types, requiring approval of significant promotion and education materials. This level of control creates unnecessary bureaucracy and cost.<sup>^</sup>
- Request for more user-friendly claims reports. Can we include truck numbers on claim reports?
- Reconciling payments is incredibly difficult with the way data is shared out by Recycle BC. Why is it the collector’s job to do this work? Payments should show that they reconcile as good practice.
- Please collect and distribute data on costs of service for each collection and stream type and Include variances for population density and composition, age, income.

\*Several votes of agreement at consultation session.

<sup>^</sup> Repeated comment and/or submission.

\*\* High number of votes of agreement and/or consistently repeated comments/submissions.

## Multi-Family Collection – Workshop Feedback

### Workshop Purpose

- To discuss proposed changes to the Master Services Agreement (MSA) and Multi-family Statement of Work (SOW).
- To discuss proposed changes to the multi-family payment framework and incentive rates.
- To provide an opportunity for multi-family collectors to share ideas and best practices.

### What We Heard at the Consultation Session and During the Written Feedback Period

#### Incentive Rates and Top-Ups

- Payment structure and proposed increases are too low.\*^
- Would like to see an inflationary mechanism built into new contracts, no inflationary rise over contractual period puts too great a risk on municipalities.
- Incentives should be tied to clean product.
- Multi-family collection incentives should be the same as curbside collection rates. There are many more challenges addressing multi-family than curbside collection.
- Reduction in administrative top-up doesn't recognize work being done by municipalities and requirements for future checking and approval of promotional materials. Rates should remain as previously set at a minimum.
- Consider increased educational top-up per household linked to contamination reductions from multi-family: incentive to do more to get more.
- Would like to see more encouragement towards multi-stream collection, current payment structure doesn't encourage it.\*^

#### Old Corrugated Cardboard Collection

- Requests for further information regarding reduced incentives for cardboard collection: how will reporting requirements look? What will be expected for collectors in determining where collection is provided if done by an alternative collector? How will segregated cardboard locations be identified and monitored? There will be greater admin costs with tracking these locations, but the admin incentive is being reduced so there is a double hit.\*^
- How to identify who has cardboard bins? Is there data available from haulers? It is doubtful hauler would provide the data.
- If the proposal is intended to encourage more cardboard collection, then Recycle BC must provide some resources for these collectors to adapt service levels to be able to collect these commercial sized bins.\*
- Reduced old corrugated cardboard (OCC) rates are overly punitive, will be a major issue if reductions are placed on municipalities if collected via a different stream. Municipality has no control over who collects or records.^

\*Several votes of agreement at consultation session.

^ Repeated comment and/or submission.

\*\* High number of votes of agreement and/or consistently repeated comments/submissions.



- Rather than explore methodology to reduce municipal incentive rates, potential solutions could include: consideration of an additional incentive to encourage municipal collectors to adopt service, and/or Recycle BC to work with private haulers of OCC to collect this tonnage and or value for OCC.^

### Contamination

- Contamination reduction is a challenge across the board with multi-family sites. Would be helpful if Recycle BC provided research and best practices for reducing contamination in this collection stream.
- Request to raise the contamination rate to at least 5% and to increase resources for dealing with contamination in multi-family buildings. It would be more useful to collectors to have ongoing audit feedback, rather than report cards a few times a year.
- Bonuses are almost impossible to achieve. Would like contamination rates linked into the bonus system.^\*
- Would like clarity on methodology for contamination thresholds.\*
- Deposit glass should not be netted off against total weight.

### Multi-family Expansion

- Help municipalities innovate solutions to multi-family collection through pilot project fund. We need to test new approaches to affect change\*
- Collectors would like to have the ability to expand services to any community, regardless of current SOW service areas. Perhaps tie multi-family collection to issuing of curbside contracts.

### Promotion and Education

- Higher turnover rate of residents in multi-family buildings results in higher costs for P&E than curbside homes. Overall admin costs for curbside are the same for multi-family. The same is true for in-house or contracted services, administrative costs are the same.^
- Concern around the top-down approach for approving P&E materials. Collectors don't need approval, nor should they have to wait for it. Suggestion for Recycle BC to look at long standing programs in the province and adapt messaging to align with the successful programs. Collectors should also have a chance to approve Recycle BC's material.
- Would like frequent sharing of best practices on how to deal with multi-family locations.
- Waste Wizard is difficult to use.

\*Several votes of agreement at consultation session.

^ Repeated comment and/or submission.

\*\* High number of votes of agreement and/or consistently repeated comments/submissions.

## Depot Collection – Workshop Feedback

### Workshop Purpose

- To discuss proposed changes to the Master Services Agreement (MSA) and Depot Statement of Work (SOW).
- To discuss proposed changes to the depot payment framework and incentive rates.

### What We Heard at the Consultation Sessions and During the Written Feedback Period

#### Incentives

- Incentive and baling rates do not cover the cost of depot operations including insurance, sorting materials, or providing staff oversight.\*\*
- Depot facilities may be forced to shut down if rates are not reconsidered. Questions about Recycle BC's business plan for depot survival.^\*
- Recycle BC has done an outstanding job of taking over PPP collection in BC, but has totally misjudged our region. The program should provide a different incentive rate structure to depots in isolated locations (e.g. islands).
- Curbside financial incentives are higher than those provided to rural depots which have to do more work, collect more material and operate longer hours.\*^
- Proposed rates appear to download more costs to local governments and tax payers and don't seem to be in line with what the Province set out to accomplish in 2011: *"the Province amended the Recycling Regulation to make businesses supplying packaging and printed paper responsible for collecting and recycling their products. This was done to shift recycling costs from BC taxpayers to producers, and to give producers more incentive to be environmentally friendly by producing less packaging and waste."*^
- Depot funding shouldn't be based on tonnage. We are collecting PPP at a higher rate with low contamination, and bale much of our products, saving Recycle BC's costs.\*^
- Because Recycle BC is presently providing approximately one-fifth of our operating needs, we require top ups from our regional district, community membership, and fundraising to stay viable. Additional funds proposed for tonnage collection is only cost of living increase, baling incentive increases will only shift this income from GBN to collection side.
- There should be a bonus incentive for low contamination.^\*
- If depots are not funded equitably, residents in some communities will be double paying for PPP.^
- Do the new incentives justify the capital cost for new equipment?
- Recycle BC should not dictate how depots are run if they will not pay adequate incentives.
- Request for a time/motion study to properly identify the time/cost to collect/prepare PPP at depots.

#### Materials

- Recycle BC should increase steward payments for PPP that is not recyclable.^\*
- Proposed incentive rate for "other flexible packaging" isn't sufficient.^\*

\*Several votes of agreement at consultation session.

^ Repeated comment and/or submission.

\*\* High number of votes of agreement and/or consistently repeated comments/submissions.

- Acceptance of other flexible packaging at depots should be voluntary if it is to be used as an engineered fuel source.<sup>^</sup>
- Establish a standard to ensure residents from all communities have fair and equitable access to depots. Because we had to expand our depots to include foam packaging, separated glass and film plastic, our operating costs have increased greatly.

### Depot Classification Changes for Depots with Curbside Service

- Concerns about Group 3 categorization, many questions about thresholds, methodology and data used to arrive at the categorizations and incentive rates.<sup>\*^</sup>
- Strong objections to the proposed elimination of incentive rates for paper, cardboard and containers at government and Group 3 depots.<sup>^\*</sup>  
Proposed approach creates an uneven playing field between public and private depots. Criteria should be established that ensure a level playing field, and any depot meeting criteria should be funded, regardless of type of ownership.<sup>^\*</sup>
- Elimination of fees for depot collection of fibre and plastic containers will not be well received by residents and will likely force closures.<sup>\*^</sup>
- Calls to cancel Group 3 depots completely.<sup>\*^</sup>
- Preferential incentives for private depots are counter to the Stewardship Agencies of BC Action Plan to Enhance Extended Producer Responsibility in BC.
- These groupings are not compliant with SABC guidelines.
- Removing fibre incentives is abdicating Recycle BC's mandate in collecting residential PPP materials.<sup>^</sup>
- We fail to see how the reduction in incentives for paper and containers will change behavior. If depots stopped accepting this material, citizens would be paying the same amount of taxes and see a direct reduction in their service, leading to political backlash. The tonnages collected at depots along with low contamination rates, attests to the clear need and desire for public access to depots.
- If incentives are removed for Group 3 depots, a continuous improvement fund should be set up that local governments can apply for. Other stewards help fund capital investment.
- Local governments have made facility investments to further waste diversion, and to meet Recycle BC standards. This provides an opportunity to drop off material that exceeds size or quantity of curbside collection. Proposed changes will impact this collection.
- Our regional district has been working through education and outreach to encourage citizens to recycle only PPP at the curb to reduce contamination, but that all waste is accepted at depots. We cannot stop accepting PPP at our depots.
- Residents with curbside service require depots from time to time, particularly around Christmas, when moving, or during extreme weather conditions.
- Our regional district currently has multi-family residents who do not have access to curbside collection and rely on our depot for recycling. Proposed changes may prevent this.
- Our key take away on this topic is that Recycle BC values private depots over municipal depots.
- Appears as though Recycle BC hasn't researched why residents use depots. This should be done before describing depots as competition duplicating curbside service.

\*Several votes of agreement at consultation session.

<sup>^</sup> Repeated comment and/or submission.

<sup>\*\*</sup> High number of votes of agreement and/or consistently repeated comments/submissions.

### Promotion and Education, Logo Use Requirements

- No objection to use of Recycle BC logo so long as it does not place a greater burden on municipality. Concern about the use of logo should it not outlive the life of the asset.<sup>^</sup>
- We are currently the only ones advertising for Recycle BC depots. Who should cover this cost? Other municipalities may run Recycle BC depots in their area, but we don't. Perhaps greater incentives needed for this situation, or further requirement for depots to advertise.
- Request for online certification for depot staff training to ensure that staff are able to provide proper information to residents, and maintain consistent messaging.\*\*
- Other requests for additional educational tools for depot staff.\*\*

### Material Storage and Staffing Requirements

- We do not support requirement to store material so that quality is not impacted by inclement weather. The proposed language is broad and does not provide a mechanism for dispute resolution.
- Instead of requiring roofs or covers, perhaps Recycle BC could work with depot operators where there are issues to collectively address the problem.
- If required to cover/protect materials, provide alternative collection bins or subsidy/loan for construction.\*
- Regarding responsibilities of depot staff to check containers regularly, remove improperly stored material and communicate with customers: we recognize the importance of this issue and take appropriate measures when required. Requirement is too prescriptive, interferes with operations.

### Reporting and Working with Green by Nature

- Concerns about unequal service from Green by Nature (GBN), some depots having capital investment covered and others not.
- 3-way communication with Recycle BC and GBN is difficult. Depots need contract clarity, better relationship with GBN.
- Difficulty with reporting requirements between different formats of Recycle BC and GBN. Recycle BC should work with GBN to harmonize reporting.
- Depot EFT reporting: frequency is too high, would rather see monthly reporting.
- Please implement an online portal system where shipment weights, payments, audits etc. can be tracked so depots can check their data rather than individually tracking shipments and payments.

### Other Questions and Comments

- All Encorp depots should have the opportunity to participate in this program.\*
- Re-assess "access to a depot." 98% of the province having access is not realistic or believable. Many in smaller communities do not have vehicles or public transit. Access to depot should be assessed at a regional level not provincial.\*\*
- Depots would like a stronger partnership with Recycle BC- more focus on depots.
- Our community members want to recycle. They honour the first two aspirations of the prevention hierarchy. In your mission statement you pledge to "be a trusted environmental advocate and

\*Several votes of agreement at consultation session.

<sup>^</sup> Repeated comment and/or submission.

\*\* High number of votes of agreement and/or consistently repeated comments/submissions.

community partner offering equitable, effective and efficient residential recycling services”. Our citizens deserve equal opportunity to recycling as other provincial citizens.

- Health and safety concern about glass; should have glass-specific mega bags.
- Through the incentive rate debates, we must not lose sight of the pollution prevention hierarchy.
- Recycle BC’s long-term plans for depots: will the number of depots expand?
- Requests for Recycle BC staff to spend more time at depots.\*^



\*Several votes of agreement at consultation session.

^ Repeated comment and/or submission.

\*\* High number of votes of agreement and/or consistently repeated comments/submissions.

## Three Years of Recycle BC Data – Workshop Feedback

### Workshop Purpose

- To review Recycle BC's program performance from 2014 to 2016 as shown through key metrics and scorecards.
- To discuss findings and implications of these metrics, and explore the feasibility of additional recycling performance indicators.

### What We Heard at the Consultation Sessions and During the Written Feedback Period

#### Strengths

- It's great to see the amount of data that has been gathered; great to see data being taken seriously.
- We like all the data so we can pick and choose for reports to council.

#### Communication of Data

- Concerns that not enough detailed information is being provided, and data is not provided quickly enough to allow for proper response.<sup>^</sup>
- Requests for individual data pack information more often.\*
- Please stop sending us excel spreadsheets of data that each depot/collector has to individually manage.
- Recycle BC should create or borrow a platform to create a backdoor online portal to provide data monthly where collectors can self-serve.\*
- More frequent communication of collection data – monthly or weekly.<sup>^</sup>

#### Collection and Recovery Rates

- Analysis of the single family and multi-family garbage streams suggest 30kg per capita of residential PPP could be misplaced in garbage stream each year. If Recycle BC is recovering 40.7kg of residential PPP per capita, the recovery rate could be as low as 57%, rather than reported 78% rate. This information should be reviewed to determine what additional materials could be recovered.\*
- Request for amount of PPP distributed in BC compared to how much PPP is being recovered through Recycle BC EPR program (by type), by location.\*
- Assess collection and diversion rates on a regional basis and per regional district. Provincial numbers do not adequately represent service levels in most communities outside the lower mainland.\*<sup>^</sup>
- Provide amount and composition of PPP recovered in each municipality (i.e. total tonnage collected by city from all depots, from all curbside, and all multi-family in that city). Will help to understand residential compliance and participation levels and staff planning.<sup>^</sup>
- Compare communities with similar dynamics across all data sets to help develop best practices, share knowledge, benchmarking.<sup>^</sup>
- Provide tonnage per capita, not per household- households are a business construct but don't relate to actual performance. Per capita is a more accurate representation of individual human behavior, to help us drive behavior.<sup>^</sup>

\*Several votes of agreement at consultation session.

<sup>^</sup> Repeated comment and/or submission.

\*\* High number of votes of agreement and/or consistently repeated comments/submissions.





- Provide some analysis on urban versus rural contamination comparisons.\*
- How many tonnes (for each category) of foam packaging of soft plastic, and of multi-laminated packaging are used in BC annually? For each of these three categories, how many tonnes are recovered by Recycle BC?

### Material Marketing and End of Life

- Materials by weight compared to materials by value. A monthly graphic will provide quick understanding of effort versus value. This would help improve efficiency (best use of staff resources, how to improve recycling behaviors and target communication for staff training).^
- Would like more information about end of life of different material types to develop interventions to improve recovery.
- Would like a further breakdown of end of life data (i.e. high vs low value end markets/extent to which replaces use of virgin material/open vs closed loop recycling).\*
- Is recovery rate all recycled? How much is recycled and how much is disposed? How much will become engineered fuel?

### Composition Audits Results

- Request for audit data more often and as completed. Please include truck numbers so we can follow up with specific routes. Include data on what specific materials are to help us target education, and use positive reinforcement when necessary.\*^
- Request for data from all the audits that go into our scorecards, not just bad ones.

### Depots

- Provide individual depot capture rates (by material volume).^
- Provide average population per depot service area broken down by private and local government public depots.^
- Would like to see the source location/address of the person dropping off recycling. This will provide key data with respect to whether people who have curbside service are using depots to drop PPP.
- Please provide capture rate for foam packaging at depots with curbside versus depots without curbside. This will help understand role of depots in locations without other recycling options, and the relative success of different types of depots.

### Other Requested Data or Metrics

- Data related to customer response about the program/results of required customer service reports. What are people asking about recycling?
- Best collectors by quality and quantity (ask the collector if you can share their info publically), to help us develop best practices.
- As a new community to the program, we would like to learn how multi-family and curbside tonnages are determined when the materials are mixed in trucks

\*Several votes of agreement at consultation session.

^ Repeated comment and/or submission.

\*\* High number of votes of agreement and/or consistently repeated comments/submissions.

## Contamination – Workshop Feedback

### Workshop Purpose

- To present a detailed view of contamination as represented by three years of data.
- To discuss findings for non-packaging and printed paper and non-targeted material in the Recycle BC collection network.
- To use presentations by collectors on best practices as a springboard for brainstorming effective strategies to reduce contamination, including public outreach, education, and on-the-ground monitoring.

### What We Heard at the Consultation Session and During the Written Feedback Period

#### Thresholds and Recovery Levels

- Calls to eliminate the 3% threshold. Thresholds should vary based on demographics, collection system, and contamination reduction methods.\*^ Providing a hard percentage target implies contamination is 100% controlled by collector.
- Concern with how contamination is calculated: would be better to have a weighting mechanism to materials such that contamination rates better reflect level of contamination by incorporating volume, weight, item count and severity.^\*
- How was 3% contamination rate determined?^\*
- Current contamination targets are difficult to achieve and proposed revisions will require increased education and costs for municipalities. Recommendation that curbside contamination threshold be adjusted to more attainable levels.\*
- Despite significant education efforts by our city, confusion still exists around items that are recyclable and those that are not. Suggestion that items that are recyclable but not part of Recycle BC program should not be counted as contamination as it is often producers that label items as recyclable.
- Amend program to accept all recyclables, will increase recovery levels and reduce contamination.\*
- Incentivize low contamination rates with bonuses.^
- Introduce fines for contamination; allow processors to impose fines.^
- Support proposal for cross-contamination thresholds (multi-stream and segregated glass). We encourage Recycle BC to revise the definition of non-targeted material to include cross-contaminated PPP.
- Encourage Recycle BC to frame contamination conversation around non-targeted materials rather than non-PPP, particularly when discussing operational performance. Non-targeted is more accurate and real reflection of operational environments.

#### Audits

- Requests for more timely and detailed data and feedback.^\*

\*Several votes of agreement at consultation session.

^ Repeated comment and/or submission.

\*\* High number of votes of agreement and/or consistently repeated comments/submissions.

- Would like more transparency around waste audit procedures: Would like feedback on contamination types identified in waste audits within streams. Better flow of information to allow collectors to act quickly and identify specific areas/buildings for education/enforcement.^
- Contract independent auditors. Conflict with Recycle BC conducting their own; Allow collectors to attend audits on request.^

## Materials

- Soft plastics need higher producer fees. Workshop revealed that miss-sorted plastic bags cause sorting lines to shut down 25% of time.
- Concerns about film being difficult to process and sort, confusing for residents.^ Feasibility of having a separate stream for film?
- Come up with ways to make it easier to recycle film, glass and foam packaging. Many people will not take these to a depot- difficult for seniors.
- Frustration that money is spent researching hard to recycle plastics instead of changing what is allowed in the market.^
- Recycle BC should use influence as an industry organization to steer manufacturers away from products that contaminate the recycling stream.^\*

## Other Suggestions and Requests

- One contamination reduction strategy is to witness material delivery at receiving facilities. It would be helpful to be able to observe delivery without requiring a Recycle BC escort.
- Requests for clarification on future plans for shredded paper rules (paper bags versus clear plastic bags).\*
- Requests to allow load rejection by processors and increased funding for curbside enforcement.^
- Create a gold star program for high performing programs.\*
- We feel supported by Recycle BC in contamination reduction efforts, continued support by field representatives is important to us.
- Recycle BC to help facilitate improved relationships between local governments and collectors doing similar collection.
- Hire ambassadors, province-wide outreach from Recycle BC, similar to BC Hydro. Use summer students to help with inspection programs.\*
- Requests for a breakdown of contamination materials showing volume, weight, and count, instead of just a percentage, to enable focused education.^
- What is the true cost of contamination? Instead of threshold, provide market value.
- Requests for data showing: Top 5 or 10 contaminants as well as the percentage or tonnage of non-targeted PPP; Contamination rates per household; Contamination rates for depot service only versus curbside collection.

\*Several votes of agreement at consultation session.

^ Repeated comment and/or submission.

\*\* High number of votes of agreement and/or consistently repeated comments/submissions.

## Streetscape Recycling – Workshop Feedback

### Workshop Purpose

- To review and discuss the findings from Recycle BC's past streetscape collection pilots.
- To review and discuss the design implication of streetscape collection containers and other program attributes.
- To discuss the proposed Recycle BC program for streetscape collection of packaging and printed paper in BC, including mandatory requirements and incentive rates.

### What We Heard at the Consultation Session and During the Written Feedback Period

#### Proposed Incentive Offer

- The proposed incentives are far too insufficient and will not cover the cost of PPP collection from streetscapes, or administrative efforts.\*\* The proposal will not encourage municipalities to sign on.
- The PPP stewardship plan commits to providing a market-clearing price. What happens if \$400/tonne doesn't clear the market? Will Recycle BC offer a price that clears in order to comply with the plan?
- Our 12-month pilot indicates the costs will be \$6500/tonne for streetscape collection and setup (not including other more difficult public realm areas such as parkscape).
- Recommend an incentive amount per household or per capita.
- Allow communities with single stream streetscape recycling to share audit data to determine if recovery rates and contamination rates are comparable to multi-stream. If they're comparable then offer a market-clearing price for single stream streetscape recycling.^
- Yearly audits should be funded by Recycle BC.
- Reporting is too onerous based on proposed financial incentive.

#### Proposed Streetscape Program Design

- Preference for optional participation in the program, providing adequate time to implement streetscape collection along with our other regional initiatives towards source separation and increased diversion.
- We agree with the proposal's collection method and container design and colors. Our pilots indicate that a 3 stream (containers, paper, garbage) container is the best for obtaining cleanest products.
- Plan requires municipalities to purchase containers. Requiring taxpayers to front the funds to get a provincially mandated EPR program established while also paying at the retail stores doesn't seem correct.^
- Issue of organics: compostable packaging is a reality that will need to be dealt with.
- Collaborate and support municipalities already executing programs. Treat us as partners, learn from our findings.\*
- Would like to see a standardized province-wide or regional system developed (bins, icons, locations).\*^

\*Several votes of agreement at consultation session.

^ Repeated comment and/or submission.

\*\* High number of votes of agreement and/or consistently repeated comments/submissions.



- Questioning inclusion of liquids in reported weights on collection containers and impact on contamination rates.
- Questioning how capture and diversion rates were calculated.

### Streetscape Bin Design

- Streetscape collection is important tool for many communities, particularly those with high tourism. Need to ensure collection bins are designed to be wildlife proof, preventing wildlife from gaining access to waste material.
- Requiring municipalities to have certain bins will exclude a number of municipalities from participating. Recycle BC should work with local governments to determine an approach to developing a streetscapes program that is inclusive of all communities.^
- As long as contamination rules are complied with, communities should be able to determine what waste stream should be collected at each streetscape location, and how bin systems are configured. Flexibility should be given to comingle, segregate, or not include a waste stream in a given location.^

### Program Plan Comments

- Recycle BC's position only focuses on streetscape collection adjacent to residential areas. This is inconsistent with the Recycling Regulation requirement to collect PPP from municipal property including public roadways, public parks, and others.^\*
- The plan doesn't address need for continued and comprehensive public education around the need to recycle properly in the public realm.^  
The proposal seeks to offload processing and marketing requirements to collectors rather than using existing post-collection services. If no LG agrees to accept the offer, will the Ministry view this as non-compliance?
- Plan doesn't address recycling alternatives such as reducing or reusing packaging. Plan should consider opportunities to avoid the need for recycling in the first place and avoid or reduce single-use items being sold by retailers such as disposable cups, take-out containers, and bags.
- Local governments collecting small volumes would need to arrange their own processing contracts.
- Organizing and managing processing and marketing contracts on a larger scale would result in economies of scale, increased management/operating efficiencies and harmonization.
- Spirit of the program is to take responsibility off municipalities and tax payers, proposal seems to veer away from this.
- Blue box began in 1990s- success today is as a result of sustained effort. Streetscape will not be an overnight success but will take work and will pay off over time.\*

**Note: Since the November consultation, a new challenge for streetscape collection and recycling services has emerged: the China ban and global tightening of market specifications. For example, China requires material to have no more than 0.5% contamination with zero tolerance for targeted contamination such as organics; streetscape has greater than 30% contamination. As Recycle BC's pilot studies showed, PPP material can be collected but it is poorly sorted by the user, heavily contaminated, wet with residual liquids, and unclean with food waste. Hazardous material can also be present. It may be that streetscape PPP collection is non-recoverable under current market conditions.**

\*Several votes of agreement at consultation session.

^ Repeated comment and/or submission.

\*\* High number of votes of agreement and/or consistently repeated comments/submissions.

## Research and Development: Other Flexible Plastic Packaging – Workshop Feedback

### Workshop Purpose

- To introduce the new Recycle BC other flexible plastic packaging (multi-laminated plastics) collection program.
- To discuss how residents and collectors will identify and sort this new category of plastic packaging.
- To present Merlin Plastic's research and development project for the processing of other flexible plastic packaging.

### What We Heard at the Consultation Session and During the Written Feedback Period

#### Workshop Exercise

##### Strengths and Benefits

Good to see Recycle BC take on one of the largest outstanding packaging streams, volunteer trial is a good idea; landfill diversion, keeping material out of ocean; consumer convenience; value for producers; less mining of resources; increases materials accepted into program; will increase consumer awareness of product types; investing in local infrastructure (Merlin Plastics).

##### Drawbacks

Significant space taken up at depots, need high quantities to justify cost/ higher incentive fees for depots, time intensive; requires significant education for depot operators and residents, residents may put in blue bins, doesn't promote change; may increase contamination levels; more sorting work for residents; confusing for residents; should instead pressure producers to create 100% recyclable; producers should pay for every step of process including research and development; what is option for areas where no depot exists?; may hurt public perception of Recycle BC.

##### Messaging and Sorting

Recycle BC will need to develop clear messaging, ad campaign; should be called "repurposing" not "recycling"; pointing residents towards research would help; need transparency; need clear distinction between film and multi-laminated plastics; use sounds, stretch and tear outreach on how to distinguish; training resources required; audits during trial period; what is acceptable contamination %?

### Research and Development Engineered Fuel Comments

- Concerns about the negative environmental and health impacts of burning alternative fuel, particularly in sensitive, confined airsheds.\*\*
- Questioning of the claimed environmental benefit of using the material in lieu of coal combustion. Our city has worked with similar air quality concerns, would like further opportunity to discuss the matter with Recycle BC.
- Recycle BC should ensure there is no net increase in air emissions related to alternative fuel. What is in remaining emissions after burning process?^

\*Several votes of agreement at consultation session.

^ Repeated comment and/or submission.

\*\* High number of votes of agreement and/or consistently repeated comments/submissions.



- Our regional district is a strong advocate for health of our residents as per our approved Solid Waste Management Plan. Allowing for any municipal solid waste from our region to be used as alternative fuel would violate our provincially approved plan.
- Requesting Recycle BC to share environmental and health impact assessments, and epidemiological studies used in decision making to use alternative fuel.^
- Request for plans to mediate or compensate health impacts to residents. We will highlight this requirement to the Ministry of Environment and Climate Change Strategy and the Ministry of Health. Can also provide these ministries with research pointing to negative impacts of using garbage as fuel and the inaccuracies of viewing it as a greener alternative than coal.
- Would like participation in alternative fuel to be optional to allow municipalities to decide if the program aligns with their strategic priorities and community values.
- Advocating for voluntary collection, not mandatory.^
- Seems like adding the flex stream is for meeting 2017 Ministry of Environment and Climate Change Strategy requirement to collect all packaging but if it isn't being recycled but used as a fuel source it doesn't fit with Recycle BC.

### Other Flexible Plastic Packaging - Supply to Market

- Pilot studies should be used to confirm recycling viability before adding new materials to the program to avoid materials being unnecessarily marketed as alternative fuel.
- Encourage Recycle BC to continue to work with suppliers and manufacturers to develop and use packaging that has viable recycling end markets.\*\*
- Waste to energy offers producers a non-recycling stream which must be discouraged. Producer payment for such materials should be increased substantially to discourage use of such materials. This option is being encouraged because it is cheaper (low-weight).\*\*
- Recycle BC and Ministry of Environment and Climate Change Strategy should place more effort on trying to limit the use of unrecyclable materials through disincentives or regulatory measures.\*\*
- Using garbage as fuel provides a disincentive to producers to modify product design. It also provides a disincentive for proper public outreach. The more residual material collected, the more fuel available for profit, leading to the commodification of these materials. This is not a zero waste practice or paradigm.^\*
- Encourage producers to adopt a logo to tell consumers how to sort; would money be better spent promoting consumers to purchase recyclable products?

### Resident Education

- Need to be transparent with residents that packing will be used as fuel. This is very different than current messaging.
- Lack of education on the issue, difficult for residents to distinguish various types of these materials.
- Need messaging to say that engineered fuel is part of a journey towards recyclability - it's a step in right direction.\*

**Note: Following consultation feedback the launch date for voluntary collection at depots of other flexible packaging has been moved to June 1, 2018 to facilitate more planning.**

\*Several votes of agreement at consultation session.

^ Repeated comment and/or submission.

\*\* High number of votes of agreement and/or consistently repeated comments/submissions.

## Marketing and Communications – Workshop Feedback

### Workshop Purpose

- To present a detailed overview of the new brand, its rationale and early results.
- To discuss challenges/opportunities with the new brand.
- To identify collector marketing and communications goals.
- To discuss existing communications and marketing support materials and how Recycle BC can support collector goals.
- To identify other materials that may be helpful or useful to support collector goals.

### What We Heard at the Consultation Session and During the Written Feedback Period

#### Positive Feedback

- Some great educational resources are available, informative website and social media site, great materials list, good reach and variety of campaign platforms.
- Our key takeaway is that partnerships and collaboration have emerged as a focus of Recycle BC. This conference is a good start. It hasn't felt this way in the past. Fingers crossed for more in the future.

#### The Brand

- The new brand is consistent, simple, clear and intuitive.\*
- Still confusion about who Recycle BC is. Logo suggests general/broad acceptance of recycling and all types of materials.\*
- Focus less on brand promotion and more on the recycling education.\*

#### Requested Materials and Initiatives

- Requests for further resources for promotion and education, training and various campaigns. Concern that funding is insufficient for long-term behavioral change and contamination reduction.\*\*
- Requests for comprehensive lists of what is and isn't accepted, and where things can be taken. Staff spending too much time looking this information up.\*\*
- Would like “face to face” communications educating residents, and providing training.\*
- Calls for Recycle BC to get into schools, develop material for children.\*^
- Current depot signage is inadequate, uninteresting, needs photos.\*
- Requests for more television and newspaper advertisements and webinars.\*^
- People are always interested in recycling processes, what things are made into, and why certain items cannot be recycled.\*
- Please do more to educate people about PPP and how EPR works. Help residents understand the difference between PPP and recycling, and why only certain materials are accepted at depots.\*^
- Recycle BC should provide province-wide standard promotion and education.\*^
- Would like Recycle BC to stop creating non-adaptable marketing materials, please provide templates.\*

\*Several votes of agreement at consultation session.

^ Repeated comment and/or submission.

\*\* High number of votes of agreement and/or consistently repeated comments/submissions.

- Requests for promotion and education on how to move away from non-recyclable materials, as well as educational pieces around multi-laminated and film plastics.\*
- Education campaigns on danger and other problems caused by non-targeted materials.
- A standardized education and outreach plan for the program to help local governments with their communications.

### Other Requests and Concerns

- Difficulty using Recycle BC files and the confusion it can cause residents in terms of understanding the various stewardship programs.\*
- Collectors wish to see their field service rep more often.\*
- Change wording from "approve" materials to "review, comment, collaborate".\*
- Too much focus on what is included in the program, more focus should be given to what shouldn't be in containers.
- Promotion and education needs to show residents that recycling isn't about convenience. We need to be truthful in informing them how to recycle correctly.
- Some local governments have been educating residents about recycling for 25 years, others just started curbside 3 years ago. Doesn't make sense to reinvent the wheel.
- Suggestion for Recycle BC to partner with other EPR programs to improve promotion and education.
- Promotion and education relies too heavily on online channels, should be more use of other media to distribute messages.
- Too much focus on curbside, not enough on depots.
- The Recycle BC app does not work and is not very useful.
- Request for focus groups/surveys of public habits including demographic information, to help with program planning and design, communications. Also helps inform where dollars should be spent.
- Participants identified items they would like to see from Recycle BC that are already available, or can be made available, indicating a simple communication issue.

### Marketing and Communication Comments Related to Contamination Workshop

- Our regional district has high contamination rates and our staff use much of their time sorting and meeting the needs of Recycle BC. Reducing contamination rates and encouraging the public to understand recycling rules requires sustained education and outreach. Our comprehensive education programs require more funds.^\*
- Request for detailed contamination reduction strategies for areas that have seen success. Was helpful to hear what other communities are doing in the contamination workshop, but a reference document would be helpful to help validate tactics.
- Would like to see education material about how contamination reduces operational efficiencies which municipalities can link to.
- Multi-family buildings: organize a positive reinforcement program that could recognize clean recycling buildings and "feature" buildings in each city annually. Encourage pride in buildings.
- Hold non-PPP events, allow residents an opportunity to dispose of contaminants.
- Hold zero waste challenges with intensive education.

\*Several votes of agreement at consultation session.

^ Repeated comment and/or submission.

\*\* High number of votes of agreement and/or consistently repeated comments/submissions.

## Summary of Consultation Feedback Themes

- Consistently repeated concern that incentives and top ups are insufficient for collection costs.
- Incentive rates should be indexed annually.
- Concerns about the impacts of the transition away from single-use bags on collection methodology, contract costs, and infrastructure costs.
- Concern and frustration that rural depots are not receiving fair incentive and baling rates.
- Concerns about the uneven playing field created by depot categorization, and calls to remove Group 3 depot category.
- Requests for depot staff training and educational tools.
- Questions and concerns about the proposal to reduce the incentive rate for multi-family buildings that do not collect OCC under the Recycle BC program.
- Concerns about unique needs of and challenges for rural areas.
- Strong concerns about program entrance requirements creating barriers for rural areas whose residents deserve equal access to recycling.
- Requests for increased funding for contamination reduction and promotion and education efforts.
- Various concerns and requests around contamination thresholds and targets.
- Collectors are interested in and challenged by contamination, want to learn more about successful approaches. Successful programs want to be acknowledged.
- Requests for more timely and detailed data and feedback on performance and more frequency and transparency of audits.
- Hope for a more favorable streetscape program proposal including better assessment of program costs, methods of reducing contamination, container styles, funding mechanisms and alternate approaches for dealing with some materials.
- Recycle BC's position on streetscape collection is inconsistent with the Recycling Regulation requirements for producers to develop a plan to collect PPP from municipal property including public roadways, public parks, and others.
- Support for Recycle BC taking on one of the largest outstanding packaging streams: multi-laminated plastics- through a volunteer trial.
- Consistently repeated concerns about the negative environmental and health impacts of burning alternative fuel, particularly in sensitive, confined airsheds.
- Concerns about difficult to recycle or unrecyclable materials. Calls for Recycle BC to pressure producers to change material choices or pay higher stewardship fees.
- Recycle BC should collaborate with the Province to include ICI material in the program, as well as non-PPP recyclable materials.
- Program plan should include focus on packaging redesign and the need to ensure that Recycle BC encourages reduction and reuse as required by the Recycling Regulation.
- Repeated calls for evidence-based decision making. Requests for research and best practices to be provided to justify proposed changes.

\*Several votes of agreement at consultation session.

^ Repeated comment and/or submission.

\*\* High number of votes of agreement and/or consistently repeated comments/submissions.

## Next Steps

Thank you for providing your feedback during the consultation process. The next steps of the consultation process are outlined below:



## Appendix A: Online Feedback Submissions

Stakeholder Group	Topic	Question/Comment	Response (if direct question posed, otherwise noted as feedback)
Regional District	Program Plan	<p>We understand that Recycle BC can only present 5-year plans but we assume Recycle BC will have a vision for 25 years. The Province has a Solid Waste Management Plan template for a 10-year plan with a vision of 25 years. Recycle BC is a significant partner (contracted service) for any regional district in BC, therefore, when a regional district is planning their infrastructure, diversion goals or even stating strategies to reach their goals, how are those valid if there is no guarantee that Recycle BC will change its direction every 5 years? In particular, what is the Recycle BC vision going forward for expanding recyclables from PPP to other items such as glass (we assume some jurisdictions have started this already).</p> <p>Proposed changes discussed incentives for more tonnage received; we assume, apart from business requirements, this also helps in increased diversion. However, in the Regional District's Solid Waste Management Plan we are asked by the Province to look into reducing before considering recycling. Most regional districts now have their waste composition studies completed. Why not incentivize both reduction and recycling based on the region's yearly study?</p>	
Regional District	Program Plan	<p>The Regional District of Kitimat-Stikine submits the following in response to the presentation by Recycle BC of their proposed 5-year plan and the consultation forum which took place at the Anvil Centre in New Westminster, BC on November 15 &amp; 16, 2017.</p> <p>Firstly, the Regional District wishes to thank Recycle BC for the opportunity to participate in the consultation process and the roundtable forums and discussion which took place at the event. The Regional District is hopeful that the feedback generated at the event is sincerely taken into consideration by Recycle BC and that</p>	



	<p>any changes implemented by Recycle BC take into account the many challenges facing communities in rural and un-incorporated areas of British Columbia.</p> <p>With regards to the projected 5-year plan introduced by Recycle BC at the consultation event, the Regional District has concerns regarding several points identified in the plan. Under the proposed plan, expansion of the current Recycle BC curbside program is limited to incorporated municipalities over 5000 population, where curbside garbage collection was in place by May 2014. These standards for program expansion severely restrict rural areas and completely exclude unincorporated communities. It is the position of the Regional District of Kitimat- Stikine that these standards are unnecessarily restrictive and do not fairly allow for access to the program for all British Columbians.</p> <p>During the presentation for the Program Plan, it was identified that the goal of the Program was to review eligibility requirements for communities wishing to be included in the curbside program and that Recycle BC would continue to add waitlisted collectors, including those who originally declined inclusion in the program. The Regional District of Kitimat-Stikine was originally denied inclusion in the program because it did not have curbside collection in place during the initial program roll-out. The Regional District has repeatedly expressed a desire for inclusion in the program and in turn have been told that we are on the waitlist. The Regional District would like to know the status of the waitlist and what is the criteria Recycle BC uses to select communities from the waitlist for inclusion in the program. The Regional District disagrees with the current practice of expanding the program to communities which previously declined inclusion over those which did not initially meet program requirements but have since introduced curbside collection to their communities independent of Recycle BC.</p> <p>The Regional District is concerned that the standards Recycle BC uses to measure program success do not fairly represent the challenges faced by those living in rural BC communities. As an example, Recycle BC asserts that 98% of the Province has access to a depot. The measure used is related to driving distance, 30 minutes urban and 45 minutes rural. The Regional District feels that this is not an accurate measure as geographic distance alone should not define reasonable access. Demographics of the</p>	
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		<p>community must be taken into account. Several communities in the Regional District are not served by public transit, many residents do not own vehicles or have driver's licenses, and the referenced 45 minute driving time likely does not take into account adverse weather conditions or other issues affecting rural travel. The Regional District believes that rather than Provincial measurement standards, access to the program and depots should be assessed at a regional level.</p> <p>It was mentioned during the Program Plan Workshop that the Program was to focus on the outcome, not the process and that the stage would be set for evolution. The Regional District of Kitimat-Stikine did not meet program entrance requirements in 2014. Under the proposed program expansion, the majority of the Regional District still does not meet those requirements; the only exceptions are the City of Terrace, which is already a Recycle BC community and the District of Kitimat. For its part, the Regional District has, in the past 3 years introduced 3 stream curbside collection (Garbage, Recycling and Organics) to the Greater Terrace area, serving 2884 households. If the Regional District still does not meet the requirements for inclusion in the Program, then the Program needs to evolve further.</p> <p>While the Regional District ultimately wants to be fully included in the Recycle BC curbside program, alternate forms of assistance from Recycle BC to serve more remote and rural communities would be welcome. In the past, the Regional District has proposed operating satellite collection depots at rural, manned landfill sites. The Regional District would like to transport the collected materials and drop off at the Recycle BC depot, (which is located in the unincorporated community of Thornhill) for processing through Recycle BC. The same depot currently serves as the Recycle BC Depot for the City of Terrace. This proposal represents an evolution of the Recycle BC program; bulk drop off of Printed Paper and Packaging (PPP). One party dropping off recyclable materials from 200 households must be recognized as a practical alternative to the same 200 households travelling 45 minutes or more by car to drop off the material individually for inclusion in the same Recycle BC material stream.</p> <p>It must be acknowledged that the Regional District vehemently argued for inclusion in the initial uptake of the Program. We have since rolled out a full service curbside collection program and have introduced rural recycling and diversion initiatives. The</p>	
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		<p>Regional District wishes for a collaborative and cooperative relationship with Recycle BC for the benefit of all of our residents.</p> <p>While Recycle BC takes the position of delivering the Program to those communities which make the most economic sense from a business delivery perspective, the Regional District counters that Recycle BC is ultimately funded by all British Columbians and as such all British Columbians deserve access to the program.</p>	
Recycling society (depot)	Program Plan	<p>I have a question about your business plan for small rural isolated depots. Since the onset of the original MMBC plan, we at the Southern Gulf Islands Recycling Coalition have made it very clear that the payments from RBC do not come close to covering our costs to collect PPP. Since you have been aware of this and have not changed your payment approach to our depots, I am wondering what your business plan is for our survival, or if your business plan is for us to close our doors. This would be helpful for us to know for our ongoing planning.</p>	<p>Recycle BC's ultimate aim is to contract with depot partners in communities that support Recycle BC's goals and commitments pertaining to depot accessibility. It is our intent to continue to support the collection of PPP on Mayne Island through a depot contract with the Capital Regional District.</p>
Local Government	Curbside Collection	<p>The Village of Salmo has raised our concerns with the proposed 5,000 threshold under which communities will not be provided curbside recycling services and we would like to ensure this concern is noted in your consultation paper.</p> <p>Even though Salmo is a small rural community of 1,100, we are primarily residential and have curbside garbage pickup. Small rural communities are also often faced by higher energy consumption costs as a result of many people commuting to work in surrounding larger centers. We also have very limited tax bases (low property costs, low income, mostly residential) and have the most limited capacity of all municipalities to provide these services on our own (if Recycle BC does not provide financial incentive). That being said, we are generally civic minded and care about the environment, this was proven in our exhaustive community consultations over 2016-2017 and we found that what our people value the most is our clean air, water and access to nature and value being good stewards of these things. These values are enshrined in our document <a href="http://www.sustainablesalmo.ca">www.sustainablesalmo.ca</a> Having every resident personally drive to a depot to deposit their recycling not only reduced recycling rates, but also increases GHG emissions and compounds an existing problem.</p>	

		<p>Our community, in particular, has submitted a "community expression of support for curbside recycling" to Recycle BC with 178 signatures. We were further told in May of 2015 that we on the waiting list for curbside recycling and promised that to our community and pleaded for their patience while we waited for our turn to come up to initiate negotiations with Recycle BC.</p> <p>Now we have been told that day may never come. Please register our objection to this and sincere hope that you will reconsider this policy position.</p>	
Regional District	Curbside Collection	<p><b>Proposed Payment Structure and Rates</b></p> <p>Under your proposed rate structure, the Capital Regional District's (CRD) financial incentive would increase from \$37.00 to \$40.65 per household (HH) a year. We are pleased to see an increase in the incentive rate; however, the rate will be fixed for the next five years. This does not reflect rising costs associated with collection services. We ask that you index the rate annually, based on the Consumer Price Index.</p> <p><b>Proposed Reduction in Service Administration Top-Up Rate</b></p> <p>You are proposing to reduce the service administration top-up rate from \$2.50 to \$1.10 per HH a year as you are removing reporting requirements in the new collection agreements. However, at the same time you are adding new service requirements which will result in more administrative work for our staff. We believe that the current top-up rate should be maintained or increased.</p> <p><b>Curbside Collection Performance Bonus</b></p> <p>In the past three years, the weight of PPP collected in the CRD's blue box program has remained consistent at 150 kg of PPP per HH per year, despite a reduction in materials such as newspapers and an increase in the number of households. You are proposing to pay a performance bonus of \$1 per HH starting at 160 kg per HH. This appears unattainable. The CRD program is very successful with high participation. We propose that you adjust your performance bonus to reflect the universal reduction in capture rates of kilograms per household across the province due to lighter material weights.</p>	
Regional District	Curbside Collection	<p><b>Boundaries:</b> The CVRD curbside program services 13 000 homes and approximately 6500 homes are serviced outside the 60 km boundary that defines where Recycle BC is responsible for getting curbside material to the processor. The cost to the program is</p>	

		<p>significant as the collection program is charged \$35 a ton to have the curbside material transferred to the processor in Nanaimo. The CVRD would like to see Recycle BC use distance from home as the boundary line as the CVRD boundary is 9000 square kilometres and the boundaries are not a fair representation of where the actual service takes place. Electoral Areas A, B, C, F and I all have homes outside the 60 km boundary.</p> <p>Further the CVRD requests that 60 km boundary be lowered or scaled to reflect the reality of curbside collection. Many routes require the collection trucks to dump twice in one day and having a curbside truck travel 240 kms per day to service a route is a significant barrier in terms of time and expense to service a route. On a ten hour day you could see a curbside truck travelling up to 4 hours to just dump loads. That would see up to 40% of the CVRD collection routes spent driving to and from the processing plant. The CVRD sees the 60 km boundary as an unusually high burden to place on a collection program and request that it be lowered or a scaled system could be introduced.</p> <p>Given that due entirely to the Regional district boundary being less than 60 km away from the processor this adds \$56 000 per annum to transfer material to the processor that Recycle BC share in that expense. This \$56 000 represents 13% of the per home rebate that is currently provided to the CVRD for curbside collection.</p> <p>Proposed New Rebate: The proposed curbside collection rebate per home does not fully cover the operating expenses of the program. In fact, the CVRD still issues utility bills to all residents for recycling collection. The rebate dollars only cover the fuel and labour to run the program. The cost of maintenance and repairs of the three trucks is not covered by the program nor is any of the administrative costs to run the program. There are other expenses such as land, office space used to store and maintain the trucks and staff that are not covered by the program.</p> <p>These issues could be assisted through fuel surcharges, maintenance allowances and infrastructure assistance.</p>	
Local Government	Curbside Collection	Good idea to net out contamination from the bonus calculations. We are concerned with how contamination is calculated:	Contamination scorecards provided by Recycle BC will break down the Overall Non-Targeted

		<ul style="list-style-type: none"> <li>Is there a way to provide a weighting mechanism to materials such that contamination rates better reflect the level of contamination?</li> </ul>	<p>rate by various types of contamination, including Non-PPP, Commingled Glass, Unsortable, Plastic Bags and Overwrap, Contaminated PPP – Non Hazardous, and Foam Packaging. The sum of these six different rates will also be shared and represents the Overall Non-Targeted rate. This breakdown of the different contamination types will help collectors understand their performance within each of the contamination types.</p>
Anonymous	Curbside Collection	<p>Recycle BC proposes to increase the incentive rates based on collector collection programs. The proposed incentive rates for single stream collectors using automated carts has been increased by approximately 4% for curbside and 8% for multi-family, which is lower than other curbside groups given the lower ongoing collection cost associated with automated cart-based systems and the high levels of contamination typically found in these systems.</p> <p>Furthermore, Recycle BC is proposing to provide a higher service administration top-up rate to those local governments and First Nations that operate curbside recycling programs using local government or First Nations employees as collection staff, compared to those that contract collection services to an external service provider, given the increased administrative costs associated with managing internal collection employees.</p> <p>Our concerns are as follows:</p> <ul style="list-style-type: none"> <li>Contamination is covered through a separate mechanism in the contract (penalties) which seems that Recycle-BC is doubling dipping through lowering single-stream incentives and performance bonuses;</li> </ul>	

		<ul style="list-style-type: none"> <li>• Need to consider mobility or transportation inflation or flexibility to include new mobility costs</li> <li>• There is still an additional cost component for maintenance of automated carts;</li> <li>• There are still significant contract administration costs which include overseeing day-to-day contract operations, processing progress payments, cart management, customer service, addressing collection failures.</li> <li>• It seems by reducing incentive for separate cardboard bins at MFD's is punishing the collectors for decisions that strata councils and property managers make regarding the management of their waste.</li> </ul> <p>Recycle-BC requires advance approval by Recycle BC of a detailed transition plan in order to change recycling container type. Approval will not be reasonably withheld upon receipt of plan. Additionally, you are proposing inclusion of Recycle BC logo on additional collection containers or replacements moving forward. Recycle BC will reserve the right to approve hot-stamps or other design features of collection containers. Our concerns are:</p> <ul style="list-style-type: none"> <li>• Single-stream municipalities have invested significant money into the cart based system</li> <li>• To change carts would be significant cost implication and may be out of scope with our automated waste collection program.</li> <li>• Carts are typically interchangeable amongst the various streams of waste collected.</li> <li>• The Recycle BC requirement that they reserve the right to approve hot stamps and design features will have a significant impact on cart management operations and well as increase costs.</li> <li>• What happens if Recycle-BC dissolves?</li> </ul> <p>Recycle BC proposes it will exercise its right to develop a methodology to net out non-packaging and printed paper and commingled glass from calculation of capture rate when calculating applicable bonus payments. Our concerns are:</p> <ul style="list-style-type: none"> <li>• We are paying for contamination through a separate mechanism in the contract (penalties) which seems that Recycle-BC is doubling dipping.</li> <li>• View this as challenging and difficult to do.</li> </ul>	
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		<ul style="list-style-type: none"> <li>• If intention is to use average contamination, this will not work for all loads as each route/area</li> </ul>	
Local Government	Curbside Collection	<p>The City of Salmon Arm is currently running a single stream curbside collection process with single use clear bags. We acknowledge Recycle BC's concerns regarding the use of single use plastic bags for a variety of reasons including manual processing and environmental concerns. The City, however, wishes to continue to use the bags for the collection container until a suitable alternative is readily available on the market (ie. a see-through reusable bag). Our reasons for this request are as follows:</p> <ul style="list-style-type: none"> <li>• The largest opportunity the City has for reducing our contamination rate is curbside enforcement by the contractor. Clear bags offer an opportunity to review the materials unmatched by any other collection container (blue bins and opaque reusable bags offer a look at the TOP only, carts offer no opportunity to review). Reducing contamination is a high priority to Recycle BC, affects your bottom line in resale value, and as such it seems short-sighted to ban the use of clear bags without a suitable alternative.</li> <li>• Open bins, the next best option for contamination rates, require a significant amount of plastic to create, are not recyclable through Recycle BC's program and significantly contribute to neighborhood littering, making them arguably less beneficial to the environment than the bags. Additionally, they do not offer a solution for excess materials and the majority of our residents put out material in excess of one bin per collection and collectors generally do not seem enthusiastic about the bins for their own operational reasons.</li> <li>• We note that Recycle BC is offering a staggered payment rate for the different types of containers. This suggests that Recycle BC is already making up the increase in operational costs for the manual bag opening by paying collectors less. This is fair considering the extra time and issue the bags cause for Recycle BC processors.</li> </ul> <p>In conclusion, the City is petitioning to continue the use of the single use clear bags indefinitely into the future until such time as an EQUIVALENT reusable alternative is available on the market in order to continue to provide Recycle BC with low contamination rates. We feel that the staggered payment rates offered by Recycle BC</p>	

		are fair given the additional processing issues created by the bags and that the reduced payment should offset the concerns provided by Recycle BC.	
Local Government	Curbside Collection	<p>The City is worried about the proposal to phase out use of blue bags. If this change is implemented, then the City will need to purchase different collection equipment and collection methodology. Currently the City is able to collect garbage bags and recycling bags utilizing a split truck with manual loading on a bi-weekly basis. Prior staff experience with open blue bins at curbside leads us to believe that lidded carts will be required, necessitating automated pick up. The City has been looking at a number of different automated pieces of equipment but has not to date been able to identify a piece of equipment that is believed would feasibly allow for biweekly pickup. At this point we are concerned that we will need to switch to the cart style pick up on a weekly basis. Unfortunately, this approach appears to require a doubling of our collection efforts which the City is concerned will equate into doubling our collection costs.</p>	
Local Government	Curbside Collection	<p>Thanks again for providing us with the opportunity to participate in the recent Public Consultations in New Westminster. As I expressed to you at the conference I have a few concerns with the proposals Recycle BC presented and so I am sending them to you in writing as requested.</p> <ul style="list-style-type: none"> <li>• The elimination of Blue Bags in our community will not be well received by our citizens. Recently we asked several groups about switching to a cart based curbside collection system and the over whelming response was NO. Our elderly citizens find carts cumbersome, hard to maneuver and difficult to store and they are adamantly opposed to any sort of container based curbside collection system. We are also of the opinion that implementing this home based source sorting will drive residents to simply place recyclable items in the garbage entirely defeating the goal of recycling. The Town of Osoyoos is also entering into a new curbside collection contract within the next month which has pricing based on our existing blue bag curbside collection system. We are not sure what effect your forced elimination of our blue bag program will have upon pricing in this new 7 year contract. At the very least the Town will have to purchase and distribute blue bins to all residence which will result in a substantial cost for our very limited</li> </ul>	

		<p>operations budget. Will Recycle BC be administrating the maintenance and distribution on these new blue bins or will this be something which will be downloaded to the Town of Osoyoos?</p> <ul style="list-style-type: none"> <li>The proposed elimination of fees for depot collection of fibre will also not be well received by our community. Our community frequently utilizes the large 40 Yard container at our Landfill to dispose of fibre and the elimination of this service will certainly be noticed by the citizens.</li> </ul>	
Local Government	Curbside Collection	<ul style="list-style-type: none"> <li>No inflationary rise in rates over contractual period put too great a risk with the Municipality, would prefer to see some form of inflationary mechanism, built into new contracts.</li> <li>More detail required as to requirement for collectors policy on tagging with a view that this should not result on a greater burden being placed on the Municipality.</li> <li>No objection to use of Recycle BC logos so long as it does not place a greater burden on the Municipality.</li> <li>Concerned over use of logo should it not outlive the life of the asset (blue box/gags).</li> <li>No objection to approval of promotional material with the provision that any approval will not hinder Municipal operations.</li> <li>Reduction in adminstrate top up does not recognize work being done by Municipalities and requirements for future checking and approval of promotional materials - rates should remain as previously set as a minimum.</li> <li>Bonuses (KG/household) are almost impossible to achieve and with a reduction in packaging from suppliers and resident education reducing packing at curbside this should be reconsidered - link contamination rates into the bonus system, deposit glass should not be netted off against total weight.</li> </ul>	
Anonymous	Curbside Collection	<p>Require Recycle BC approval of policy on tagging contaminated material at the curb and tracking of associated metrics. Additionally, Recycle BC can exercise its right to require advance approval of significant promotion and education materials, including annual recycling guide/calendar, regardless of whether it includes the Recycle BC. Our suggestions:</p>	

		<ul style="list-style-type: none"> <li>• Prefer that Recycle BC work with collectors (given the diverse nature of each municipality) to determine best approaches for tagging based on individual community.</li> <li>• Recycle BC should develop and research best practice approach and criteria (that can be tailored to different community programs) developed to ensure that education through tagging and non-collection of contaminated carts is successful and it results in behavior change amongst residents towards properly recycling.</li> <li>• We would rather prefer that Recycle BC work with collectors to develop applicable material instead of mandating approval. We view this as partnership not one-way direction.</li> <li>• Potential delays to publishing materials could arise. Require timelines to be established with Recycle BC for response and should solely be for recycling.</li> </ul>	
Producer (Steward)	Curbside Collection	<p>The Clorox Company of Canada Ltd. has been a registered steward under the Recycle BC program since the program's inception. Additionally, we have a long established history of supporting British Columbia municipalities since the early 1990's with the design and implementation of highly successful waste diversion strategies that include the utilization of the GLAD® See Through Blue Bag. Our Glad® brand is the category leader in the trash space and Glad® is Clorox Canada's largest revenue business, playing a critical role in supporting 377 direct and approximately 1,200 indirect Canadian jobs.</p> <p>We are writing today to voice our strong opposition to the proposed 18 month transition away from bags and ask that this stipulation be struck from existing and future contracts between Recycle BC and its municipal partners.</p> <p>As a steward facing a double digit cost increases to our stewardship fees in BC next year, we don't support the elimination of a waste management solution that has been shown to have lower all-in operational and capital costs than either carts or blue boxes with similar, if not better, diversion and contamination rates.</p> <p>Looking forward, China's National Sword initiative has changed the dynamic for end markets that the program has relied on for the recovery of approximately 20% of its costs. While Recycle BC has chosen not to increase tonnage rates this year and dip into reserves, the demonstrated ability of none of the present cart, bag or blue box</p>	

		<p>curbside collection strategies to hit the extremely low contamination rates being demanded by the Chinese, make the viability of this strategy suspect and the likelihood of additional cost increases highly likely. In this scenario, elimination of provincial markets for blue recycling bags as we work with partners from Green by Nature to investigate the opportunity to become a potential domestic off-taker of post-consumer resin is counterproductive to the goal of a domestic circular economy. Additionally, transitioning out of bags eliminates important sources of revenue for the very stewards that support your programs that sell either branded, as is our case, or private label blue recycling bags in the province. This business supports well-paying jobs for hard working Canadians, generates tax revenues at the local, provincial and federal level, as well as investments in manufacturing and R&amp;D here in Canada. Presently, communities across British Columbia including the District of Mission, Abbotsford, Chilliwack and Salmon Arm have implemented highly successful recycling collection programs that include the use of see through blue bags. The option to use bags is popular with residents and municipal waste systems alike because they are scalable, easier to manage for disabled or elderly residents, resistant to wind and don't take up a lot of increasingly dear space in BC homes and garages as they can go directly from the kitchen to the curb. Residents in these communities should continue to have the option to use bags.</p> <p>Even municipalities with cart-based systems have voiced the support for the use to bags for surge capacity. Why should recycled material end up in the trash when there is an easy option available to keep this material out of the landfill? Additionally, bags should be viewed as a complement to blue boxes in communities where this approach is used as they can help solve wind and surge capacity issues, can go seamlessly from the kitchen to the curb and can help improve the quality of the recyclables in the boxes.</p> <p>Recycle BC's proposed move to promote a blue box system as the preferred choice for curbside collection was preceded by a similar approach in Ontario in the 1990s and 2000s. B.C. can learn important lessons from their experience. Today, Ontario municipalities continue to wrestle with the limitations of blue box systems beyond their lack of all-in cost-competitiveness, specifically: litter issues caused by wind and</p>	
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		<p>limited scalability. Subsequently, Ontario is experiencing a resurgence of interest in evolving programs to enable residents to utilize see through blue bags to place recyclable contents curbside either with blue boxes or as a stand-alone. This spring, the region of Halton, Ontario decided to allow residents to use recycling bags to collect and store their recycling materials for collection. Other jurisdictions across the country, like those in Atlantic Canada continue to expand curbside blue bag recycling programs.</p> <p>In analyzing the processing side of the equation, separating a collection mechanism or tool (blue recycling bag) from waste (shopping bag) is critical. Any survey of MRF operations will show that the overwhelming majority of the bags getting wrapped around machinery are shopping bags not blue recycling bags. As such, blue recycling bags shouldn't be made the culprit for down time at municipal recycling facilities. Investments in bag breakers or additional sorting staff to better accommodate recycling bags will also help deal with the shopping bags (which are the real issue) and pale in comparison to the capital investments necessary to implement cart or blue bin programs.</p> <p>We thank you for the opportunity to provide our feedback and look forward to the opportunity to continue the dialogue with Recycle BC about this proposal.</p>	
Local Government	Multi-Family Collection	<p>Good idea to net out contamination from the bonus calculations. We are concerned with how contamination is calculated:</p> <ul style="list-style-type: none"> <li>• Is there a way to provide a weighting mechanism to materials such that contamination rates better reflect the level of contamination?</li> <li>• Contamination reduction is a challenge across the board with multi-family sites. It would be great if Recycle BC provided research and best practices for reducing contamination.</li> </ul>	
Local Government	Multi-Family Collection	<ul style="list-style-type: none"> <li>• No inflationary rise in rates over contractual period put too great a risk with the Municipality, would prefer to see some form of inflationary mechanism, built into new contracts.</li> <li>• More detail required as to requirement for collectors policy on tagging with a view that this should not result on a greater burden being placed on the Municipality.</li> </ul>	

		<ul style="list-style-type: none"> <li>• No objection to use of Recycle BC logos so long as it does not place a greater burden on the Municipality.</li> <li>• Concerned over use of logo should it not outlive the life of the asset (blue box/gags).</li> <li>• No objection to approval of promotional material with the provision that any approval will not hinder Municipal operations.</li> <li>• Reduction in administrative top up does not recognize work being done by Municipalities and requirements for future checking and approval of promotional materials - rates should remain as previously set as a minimum.</li> <li>• Consider increased educational top up/household linked to recorded reduction in contamination from multi-family - incentive to do more to get more.</li> <li>• Bonuses (KG/household) are almost impossible to achieve and with a reduction in packaging from suppliers and resident education reducing packing at curbside this should be reconsidered - link contamination rates into the bonus system, deposit glass should not be netted off against total weight.</li> <li>• Cardboard is going to be a major issue if reductions are placed on the Municipality if collected via a different stream - Municipality has no control over who collects or records.</li> <li>• Who will fund the purchase of any containers required to collect cardboard.</li> </ul>	
Regional District	Depot Collection	<p>Proposed Payment Structure and Rates</p> <p>The proposed per tonne incentive rate increases for some materials and the new baling incentive are welcome but do not come close to covering the cost of collecting PPP at Gulf Island depots in our region. We understand that Recycle BC's original per tonne incentive was based on data from private and public depots in the province which are not comparable to the unique service model provided by non-profit recycling societies on the Gulf Islands. We ask that your plan adequately provide for paying the costs of collecting and managing PPP at those depots, as stipulated in the BC Recycling Regulation.</p> <p>Proposed new Approach to Depots in Areas with Curbside Service</p>	



		<p>Your new approach to depots in areas with curbside service creates an uneven playing field between private and public depots. You are proposing to eliminate incentives for the collection of fibres and containers for local government and First Nations depots only, but plan to continue offering applicable incentives for the same materials if they are collected at private depots. The same approach should be used for all depots in areas with curbside service, regardless of type of ownership.</p> <p>We understand that there may be some duplication of service at depots in areas with curbside service. The best indicator of whether a depot is worthwhile is the PPP tonnage received. The CRD's Hartland recycling depot is located in an area with curbside service and collects about 600 tonnes of PPP a year; thus indicating demand for the service. The CRD has surveyed users of the depot twice and found that 93% are residential. The Hartland depot provides a needed service for unusual situations like a household move, clearing an estate and the Christmas season to deal with large volumes of PPP that cannot practically be put at the curb due to time constraints and/or volumes and would exceed the usual truck capacity. We ask that you reconsider your approach to depot services in curbside collection areas based on the merit of the depot's contribution to increasing the PPP recovery rate.</p>	
Regional District	Depot Collection	<p>Removal of incentives for depot collection of PPP: The CVRD strongly discourages Recycle BC from removing the incentives for paper and containers from government run depots. Recycle BC stated that the impetus for changing incentives was to encourage the public to recycle paper and containers at the curb rather than at the depot. We fail to see how the reduction in incentives will change public behavior. If depots stopped accepting this material, citizens would be paying the same amount of taxes and see a direct reduction in their service. Rather than encouraging a change in behavior, this would lead to public outcry and political backlash. There is clearly a need and desire for the public to have access to the depots as the tonnages collected at depots can attest.</p> <p>At the CVRD, the recycling depot facilities are run on the principle that they are one-stop shops for accepting all recyclable items. The CVRD has been working on long-term behavioral change through education and outreach to encourage citizens to recycle</p>	

		only paper and containers at the curb to reduce contamination, but that all waste is accepted at the depots. It is unfeasible that CVRD stop accepting paper and containers at its depots. The expense of the labour and capital requirements to ensure that the CVRD is meeting Recycle BC requirements for paper and containers is greatly assisted by the revenue attached to these waste streams. The depot revenue received will be reduced by \$30,000 and this will have to be made up through reductions in other services. The CVRD is interested in meeting the diversion targets set out by Recycle BC through behavioral change relating to public recycling with the ultimate goal to encourage citizens to recycle paper and containers at the curb, funding for communications and education and should be implemented rather than removing material incentives.	
Local Government	Depot Collection	Currently, we are essentially the ones providing advertising for Recycle BC depots. Who should be covering this cost? Other municipalities may run the Recycle BC depots in their area, but we do not in our case. Perhaps greater incentives are needed for depot advertising.	
Local Government	Depot Collection	<p>The City understands that Recycle BC is proposing to discontinue the mixed paper and containers financial incentive for local government recycling depots in communities that receive curbside recycling collection. Local governments have made investments in providing “one-stop” facilities to further waste diversion, and many have invested in facility upgrades to meet Recycle BC standards. Depots operated by local governments provide residents with an opportunity to drop off material that exceeds the size or quantity suitable for curbside collection, and offer recycling opportunities for residents that do not receive municipal curbside service, such as the multi-family sector in Abbotsford.</p> <p>The Abbotsford Mission Recycling Depot (AMRD) drop-off depot is part of the Recycle BC network and is jointly owned by the City and the District of Mission. The proposed changes to the depot agreements would create an uneven playing field between the private and public sector, place additional cost on local ratepayers and result in a significant loss in revenue for the AMRD. In addition, the City expects to provide residents with the collection of mixed paper and containers at this depot as part of the basic service levels expected at all depots in the Recycle BC network.</p>	

Local Government	Depot Collection	<ul style="list-style-type: none"> <li>• General issue of residential recycling and cardboard being refused at Depot's will cause general upset amongst residents and complaints to Municipalities.</li> <li>• No objection to use of Recycle BC logos so long as it does not place a greater burden on the Municipality.</li> <li>• Concerned over use of logo should it not outlive the life of the asset (blue box/bags).</li> <li>• No objection to approval of promotional material with the provision that any approval will not hinder Municipal operations.</li> <li>• Depot proposals for Level 3 depots are unacceptable and need to be completely reviewed with an alternative model being presented. Some residents prefer to use depot rather than curbside as they produce large amounts or from time to time (Christmas) produce large amounts of cardboard not suitable for curbside collection.</li> </ul>	
Private depot	Depot collection	There should be an increase in handling fees for products, especially for glass jars. It takes up too much space in the Depot.	
Recycling society (depot)	Depot Collection	<p>Recycle BC views the recyclables Depots collect as a commodity and pays for them as such. Depots provide a service, and the cost of providing that service is in no way correlated to the value of the material. Please accurately determine the cost of collection for depots for different materials (e.g., Styrofoam, soft plastics, paper products containing a liquid) and pay accordingly. Pass the cost of collection on to producers, as the BC Recycling regulation sets out.</p> <p>Most Depots are underpaid for collecting these materials. On the Gulf Islands, we do an excellent job of providing the service at a very low cost. Trucking fees more or less cover our trucking expenses, so our remote location is not really what is driving the financial shortfall. We are simply underpaid for the service we provide. Bailing incentives also do not cover the cost of bailing.</p> <p>Recycle BC is proposing to pay Depots the same low rate for collecting multi-laminate plastic as for collecting soft plastic. If we are underpaid to collect the material, this savings is passed on to the producer who can continue to use the material at a discounted rate. The cost of recycling packaging needs to be built in to the cost of</p>	

		<p>using it, and that can't happen if we are paid for the materials value rather than the cost of collection. Producers use these materials at Depots expense.</p> <p>A lot of these low value materials are collected primarily at Depots, and without Depots, these materials would end up in landfills, roadsides and bodies of water; thus Depots provide an invaluable service.</p>	
Recycling society (depot)	Depot Collection	<p>Paying Island Depots (no curbside here) so much less to do so much more than curbside is a travesty! We give more service to the public by being here five days a week, take curbside materials plus plastic film, expanded foam, and glass. The materials we bale save shipping on those materials by more than 90%. Those savings alone amount to much more than we receive from Recycle BC. As we bale at a ratio of at least 10 to 1....our Plastics Roll-off Bin (22 trips this year) would have been at least 220 trips in loose form. That alone saves you folks \$90,000 a year! We service 6000+ households plus have a large population living on boats. The app \$55000 per year paid for PPP service by Recycle BC = about \$9 per household per year. Our Cost for PPP service alone is \$40 per household. This is most certainly not "fully funding PPP collection throughout the Province". The Capital Region is not obliged to subsidize us and probably will not in the future. While Recycle BC has done an outstanding job of taking over responsibility for PPP collection in BC, you seem to have totally misjudged the Gulf Island section and in effect, have put a death sentence on Depots that are probably the most efficient around. Why is a household on Salt Spring worth only \$9 a year??? It is actually quite insulting. Even with new improved funding outlined in the Meetings..we will still be far far from sustainable. Our other EPR funders are paying their share, why not Recycle BC?? We love working with you folks but there has to be some equity here. Thanks for the opportunity to provide feedback.</p>	
Recycling society (depot)	Depot Collection	<p>The Depot presentation was disappointing. Depot operators repeatedly asked why Recycle BC didn't want to pay for cardboard collected from Depots in areas with curbside collection. The Recycle BC presenter said that Recycle BC wanted to avoid a duplication of service. When operators questioned this logic and pointed out that the product collected at Depots was cleaner, drier and less contaminated, the presenter still insisted that residents shouldn't have any reason to bring their cardboard in to Depots. Operators offered several possible reasons why residents might choose to</p>	

		<p>bring their cardboard in to Depots (moving, large clean out of basement, etc.) and why this might be advantageous to Recycle BC (less trips back to the unloading station for the collection trucks; cleaner, drier product, etc.) with no real conversation on the Recycle BC representatives part. The conversation went back and forth and back and forth - until finally she commented that Recycle BC doesn't want to fund the collection of ICI material, which could be being dropped off at Depots.</p> <p>That sounds like the real reason Recycle BC doesn't want to pay for Depot cardboard in areas where there is curbside collection, and any Depot can understand this concern. However, if the conversation with Recycle BC isn't open and direct, we can't get to the root of the concerns Recycle BC has in representing Producers interests, and also, the concerns that Depots have in collecting recyclables and being fairly compensated for it.</p> <p>In a true consultation, Recycle BC and the Depots collecting cardboard in areas with curbside collection could work out the pros and cons of Depots in areas with curbside service continuing to collect cardboard. However, if Recycle BC withholds their concerns and no real dialogue happens, then the relationships between Depots and Recycle BC become strained. Only in partnership with the recycle Depots, can Recycle BC fulfill its obligations to producers in the most cost effective and environmentally sound manner.</p>	
Recycling society (depot)	Depot Collection	<ul style="list-style-type: none"> <li>• Small rural depots need additional funding. The current funding is inadequate.</li> <li>• Small rural depots need an alternative to funding by tonnage. Unless the plan is to starve these depots to death, a better system needs to be found during this round of consultation. Small depots are producing a product with very low contamination. The average contamination (contamination plus non-recyclable material in the program) rate of 15% (from the contamination seminar) means we are saving you 15% on your costs per tonne by our lack of contamination. (This doesn't even include the cost to the processor (ultimately born by RBC) of one hour in down time per every four hours of operation needed to unplug the incorrectly recycled plastic bags from the sorting line. There are virtually no miss-sorted plastic bags coming from our depots to plug up the sorting lines in the processing plants.) In addition, by baling almost all the products we can, we are</li> </ul>	

		<p>saving GBN and ultimately RBC a huge amount in transportation costs. Because the baling incentive doesn't fully cover the cost of baling, we are spending money to save you money.</p> <ul style="list-style-type: none"> <li>• Waste to Energy (dressed up as engineered fuel) is something that needs to be avoided. While it is superior to landfill, it offers producers a non-recycling stream that should not be present in a recycling program and must be discouraged. The producer payment for this material must be increased substantially to discourage the use of this non-recyclable material and its subsequent use for fuel. Because it is such a low weight alternative, the waste to energy option and relatively low producer payment encourages its use rather than discouraging it. This must be changed.</li> <li>• Producers' fees need to be significantly increased for styrofoam to discourage its use. There are other ways to package breakables, and they need to be encouraged over the lightweight and therefore cheap (cheap for the producer and expensive for the environment) alternative of styrofoam.</li> <li>• Soft plastic needs substantially higher producer fees. According to the contamination seminar, miss-sorted plastic bags cause sorting lines to be shut down 25% of the time. That means that 25% of sorting costs are attributable to soft plastic. That cost should be borne by the producers/users of the material.</li> </ul>	
Recycling society (depot)		<p>Recycle BC's evolving Packaging &amp; Printed Paper (PPP) program is still missing a depot group: Isolated, PPP Primary.</p> <p>The Pender Island Recycling Society's (PIRS) recycling depot is accurately described by this depot label: PPP collection is our primary function, rather than ancillary as is the case with Encorp bottle depots. PIRS' recycling depot has fixed operating costs in collecting PPP regardless of the other recyclables accepted at our facility. Our depot is efficient; at every turn, trying to deliver services in an economical and environmental responsibility manner. Visits by Recycle BC, CRD, and GBN staff concluded the same thing: "No other efficiencies to be found here." (Note: Funding of non-PPP services and our "Reduce and Reuse" initiatives are independent of PPP collection financing.) In addition to per tonne incentive financing paid to the Capital Regional District (CRD) for PPP collection by our island depot, baseline funding needs to be provided to the</p>	

		<p>CRD to cover the fixed costs of PIRS collecting PPP from residents on the local government's behalf. This baseline funding from Recycle BC would not vary with the tonnage of PPP collected (our PPP tonnage is principally fixed due to our isolation). While the proposed Recycle BC Incentive Rates (\$/Tonne) for depots would increase revenue to the CRD by 11.5% (for the PIRS depot operation), the total dollar figure generated still falls far short of the funding necessary for Pender Island Recycling Society to deliver efficient and entitled packaging and printed paper collection to Pender Islands' residents. Proposed Group 1 No Curbside/Multi-Family Applicable Incentive Rates would cover only 20-30% of PIRS' annual operating costs in collecting PPP (costs that are likely going to increase with a focus on heightened product quality).</p> <p>Recognizing an additional depot group type and adding a baseline funding component is central to Recycle BC providing appropriate funding for the collection of PPP by Pender Island Recycling Society and the other Southern Gulf Islands Recycling Coalition (SGIRC) depot operators. The relatively small amount of additional income needed for Recycle BC to provide this baseline funding to the CRD for PPP collection on the Southern Gulf Islands can be easily offset by a small increase in fees paid by PPP producers, in particular those using non-recyclable or difficult to recycle packaging. During Session 4 Depot Collection, Recycle BC's Jordan Best said: " . . of course we need to properly support the [Southern Gulf Islands Recycling Coalition] depots." He was unable to answer when I asked: "At what percentage of our PPP collection operating costs does "properly support" equate to"</p> <p>Recycle BC should keep in mind that Pender Island Recycling Depot, and the other SGIRC depots, collect PPP at a higher rate than most other residents of British Columbia (53.3kg vs 40.7kg - Recycle BC 2016 Annual Report) and with very low contamination rates (saving Recycle BC a substantial amount of money).</p> <p>The late (and truly missed) Ann Johnston would have made several comments about the "updated: Recycle BC program. Two of these points would have been:</p> <ol style="list-style-type: none"> <li>1. Southern Gulf Islands residents MUST NOT pay twice for PPP recycling collection (a core principle of the B.C. Recycling Regulation); SGIRC members continue to argue that the CRD subsidy provided to its depots for PPP collection, to top up the underfunding</li> </ol>	
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		<p>by Recycle BC, is a double charge of consumers: therefore in breach of the B.C. Recycling Regulation.</p> <p>2. In all of this debating, we MUST NOT lose sight of the provincial pollution prevention hierarchy. (BCRR 5(3): pollution prevention is not undertaken at one level unless or until all feasible opportunities for pollution prevention at a higher level have been taken: (c) reduce . . . and (d) reuse the product; that the PPP producer must be deterred from using difficult to recycle or non-recyclable packaging. And, waste-to-energy should be an expensive option.</p> <p>During Thursday morning's Contamination workshop, Recycle BC's Bill Patton proudly pointed out the Recycle BC slogan: Making a difference together. He then said: "We really believe this . . . [working cooperatively with] residents, producers, collectors, and post-collection partners and other stakeholders."</p> <p>Ann Johnston would have replied: "Show us the money; that our island residents are entitled to." And: "Your slogan would better read - Making the environment healthier together."</p> <p>Please let me know if you would like to discuss the content of this feedback submission further.</p>	
Regional District	Depot Collection	<p>The Alberni-Clayoquot Regional District (ACRD) operates 2 Recycling Depots (run by contractors). One located in the City of Port Alberni and one at the Alberni Valley Landfill which is located in the Sproat Lake Electoral Area. Both depots have a high volume of traffic and material collection.</p> <p>The depot located in the city is used by multi-family residents and residents of our Cherry Creek Electoral Area, and of course by everyone who recycles their foam packaging, plastic bags and overwrap and glass bottles and jars. This Depot also hosts many of the other stewardship programs who are contracted out with the contractor who runs the depot. This depot bales all material, which is a very efficient method to transport the material to the mainland.</p> <p>The depot at the Alberni Valley landfill is used by residents of Sproat Lake and other multifamily residents in the area of town. This depot does not bale any material; it is all hauled in mega bags to the mainland.</p>	

		<p>Both depots are supported by the Regional District and Recycle BC incentives. The ACRD provides curbside collection to the City of Port Alberni single-family residents and the Beaver Creek Electoral Area. We do not provide or ever will provide curbside pick up to any multi-family residences as this is not in our jurisdiction. Therefore, the only option is to run depots to provide the opportunity for recycling.</p> <p>The ACRD purchased the property and building to operate the depot in the city. We pay the contractor to run the facility and we pay for all of the upgrades and maintenance. We do not make any money running the depots. Removing the incentives we receive for Categories 1, 2, 3b and 3a, 6, 7 would put a huge cost on the Regional District. One, which may force the ACRD to close the sites. These services are not part of the tax requisition of the ACRD or the City of Port Alberni.</p> <p>Please do not eliminate these depot incentives, it would be a huge step back for the Recycle BC program, as there would be limited recycling opportunities to a great portion of the Alberni Valley.</p>	
Recycling society (depot)	Depot Collection	<p>Thank you for the opportunity to give feedback. With regard to depot collection, with respect to all-inclusive depots in “remote” areas (i.e. areas where no other recycling services exist or can be accessed owing to geographical situation), the funding model which you present, even with the proposed increases in returns from cost of living increases and the addition of new categories and consequent incentives, is completely inadequate for us to continue operation.</p> <p>At the present time you are providing, on a tonnage analysis, approximately one fifth of our operating needs. This leaves our depot in need of “top up” funding from our regional district (double dipping) as well as community memberships and donation/fundraising to make our depot viable. The increases in baling incentives which you offer will only mean the shift of this income from GBN to the collection side of the register. The additional funds for tonnage collection is only a cost of living increase. We need more money for our depot’s existence in the first place.</p> <p>Depots such as ours were founded and offer a complete range of PPP recovery, including the styrofoam, glass and plastic bags which are unavailable to curbside residents, except at designated depots in their communities. Our collections are</p>	

		<p>cleaner and result in far less contamination than curbside pickup. As well, these depots are the only game in town for any sort of recycling and, consequently, save our environment from the dumping of these items as garbage should our depot not exist. Given that your programme was to offer a “seamless” transition (BC regulation statement) from our previous contract with the CRD and that we have received numerous fruitless examinations of our depots for operational efficiencies, i.e. no further efficiencies could be suggested, we suggest that depots such as ours need to be placed in an entirely new and separate depot designation with the realization that ours is an economy of scale that cannot exist on tonnages produced. I note that the curbside programme has no reference to such a measuring stick. Further, as PPP continues to evolve. Packaging weighs less and becomes more bulky. Added to this problem is the need to sort and place apparently recyclable PPP materials in the garbage stream at present, an additional cost to our depots. I am hopeful that with the addition of a category 9, a good portion of this problem will be addressed. However, we cannot rely on present practices to change in a sufficient and timely fashion to solve the problem. There needs to be some sort of pressure that can be applied by your organization to effect change in the behaviour of its members. How can this be done? Greater participation fees, fines?</p> <p>Our community members want to recycle. They honour the first two aspirations of the recycling hierarchy, reduce and reuse, incorporate OCB, glass, newspaper and plastic containers in their daily lives in gardens and workshops. Given that consumerism on the ever increasing scale that exists, is a threat to the existence of our planet, such behaviour should be acknowledged.</p> <p>In your mission statement you pledge ‘To be a trusted environmental advocate and community partner offering equitable, effective and efficient residential recycling services.’ For us on Galiano Island, this would mean finding a different formula and designation for our depot which would provide us with a realistic operating budget, so that we can continue to offer a high quality service to our residents who are citizens of our province and deserve a recycling programme which is equal to that offered to the greater provincial community.</p>	
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		Thanks for the opportunity to express my concerns. The question I have is: CAN YOU PROVIDE US WITH GREATER FUNDING TO MATCH OUR NEEDS AND ENSURE OUR CONTINUED EXISTENCE?	
Depot operator	Depot Collection	Could you let me know how you came about formulating the new proposed incentive rates for depot collection in 2019? Also, would Recycle BC assist in financing balers or densification equipment?	<p>Recycle BC considered a number of factors when developing the new proposed depot incentive rates for depot collection, including feedback from depot collectors, value to the Recycle BC program of the depot network, industry standards, implications of new material streams (e.g. addition of other flexible packaging), market conditions and other factors.</p> <p>We will consider the feedback on financing balers and densification equipment.</p>
Regional District	Depot Collection	<p>Comments arising from the Nov. 15 webinar on proposed changes to the Depot Collectors Agreements</p> <ul style="list-style-type: none"> <li>• The cost of insurance required by Recycle BC for Depots is not compensated at either the present or proposed incentive rates.</li> <li>• The cost of storing materials is not covered by either present nor proposed materials incentive rates.</li> <li>• The cost of providing staff over-site of the Recycle BC drop off depots is not covered by the present or proposed incentive rates</li> <li>• The increase in incentive rates proposed (Plastic, Styrofoam, glass) will not cover the costs associated with providing depot space, insurance, storage space, and staff time.</li> <li>• The proposed description of the different depot types discriminates against First Nations and Local Governments. Clearly Recycle BC would like to end their relationships with these service providers.</li> </ul>	

		<ul style="list-style-type: none"> <li>The proposed incentive rate for 'other flexible packaging' is not sufficient to provide staffing time, insurance, depot space or storage space.</li> <li>It does not appear that Recycle BC has researched why residents actually use depots. I would suggest that this be done prior to addressing a problem that may or may not actually exist. More research needs to be done before simply describing depots as a competing duplication for the curbside service.</li> </ul> <p>The business model for Recycle BC is urban (quantity) biased. Most rural areas will not make the threshold for profitability. Yet the resident has paid the Recycle BC recycling levy and the tipping fee as the material inevitably ends up in the environment (landfill).</p> <p>This is a business model that does not work throughout all of BC.</p>	
Local Government	Three Years of Data	As a new community to the program we did not receive a data package but we are curious about how multi-family and curbside tonnages are determined when the materials are mixed in the truck?	Communities which collect a mixture of curbside and multi-family material in the same truck at the same time will see all of the tonnage of that truck reported as curbside tonnes. Only when the truck collects just multi-family material during any given route will it be reported as such.
Recycling society (depot)	Three Years of Data	How many tonnes (for each category) of styrofoam packaging, of soft plastic packaging, and of multi-laminate plastic packaging are used in BC annually? For each of these three categories, how many tonnes are recovered by Recycle BC?	Recycle BC does not report supplied tonnes or recovery rates to this level of detail.
Industry Association	Three Years of Data	Carton Council commends Recycle BC for sharing a large quantity of data during the 3 Years of Recycle BC Data workshop session. Missing from this body of data, however, are material-specific recycling rates. As you are aware, the packaging and paper stewardship programs in Quebec, Ontario, and Manitoba publish material-specific recovery rates on an annual basis. In all three provinces as well as in BC, these are in turn used to calculate material-specific fee rates.	Recycle BC does not report supplied tonnes or recovery rates to this level of detail.
		Having this information would allow organizations such as ours to measure our progress in BC. It would also allow Recycle BC members (brand holders and first	

		importers) to report out against the targets they have set as part of their corporate social and environmental goals, as well as equipping them with the necessary information to address consumer enquiries on this matter.	
Regional District	Contamination	Contamination Bar (3%): Depending on the areas of service (rural vs urban, availability of curbside garbage service and other factors), Recycle BC should have a gradual goal of lowering the contamination, e.g. 10% or more should aim at 7% in 2 years and then 4% the following 2 years. Less than 3% will always be a challenge for automated curbside service. We understand the mounting pressure on Recycle BC, but we also need to recognize that human behavior will change slowly. Recycle BC branding and unified messaging for recycling by Recycle BC will help residents understand what is accepted in the blue bins and why.	
Regional District	Contamination	<p>Education and outreach: The CVRD sees the education and outreach funding from Recycle BC as insufficient for effecting long-term behavioral change relating to public recycling practices. The average resident of CVRD does not understand the details of Recycle BC items, and finds the difference about what's accepted at curbside, at depots, and not accepted at all very confusing. The CVRD recommends that Recycle BC have a standardized education and outreach plan for the program to help local government with their communications.</p> <p>Communication and education is crucial to reducing recycling contamination. Within the CVRD, the contamination rates within PPP recycling are high, and as a result staff at the CVRD work on paid staff time to sort and meet the needs of the Recycle BC program. Reducing the contamination rates within recycling, and encouraging public to recycle particular items at the curb while bringing others to depots requires sustained and penetrating education and outreach to make an impact. Studies show that education in the form of personal contact and feedback is the most effective for reducing contaminations rates (i.e. face-to-face contact at depots and tagging of recycling at curbside) and these programs are very costly. If CVRD is to meet the requirements of Recycle BC, funding for education and outreach must be sufficient.</p>	
Local Government	Contamination	<ul style="list-style-type: none"> <li>Shredded paper in paper bags or clear plastic bags- we understand current rules, but we'd like some clarification on future rule plans (i.e. will everyone be going</li> </ul>	

		<p>towards paper bags?) so that promotional materials are created using appropriate messaging for residents.</p> <ul style="list-style-type: none"> <li>• We feel well supported by Recycle BC in contamination reduction work. Continued support by field representatives is important.</li> <li>• Could Recycle BC share detailed contamination reduction strategies by collection method (i.e. single stream auto carts) for areas that have seen success? It was good to hear about what other communities are doing in the workshops but a reference document would be helpful to refer to and help validate tactics in the field. For example, how much contamination should be tolerated before leaving a cart behind?</li> <li>• One of the suggested contamination reduction strategies is to witness material delivery at the receiving facility. Collection staff require a Recycle BC escort to enter the receiving facility. It would be helpful to be able to observe material delivery without requiring an escort.</li> </ul>	
Local Government	Contamination	<p>The proposed changes to the curbside and depot collection agreements appear to result in more stringent contamination requirements. Based on the material presented at the workshop and subsequent discussions with collectors, the current contamination targets are difficult to achieve, and the proposed revisions will require increased education and costs for municipalities. The City recommends that curbside contamination thresholds be adjusted to more attainable levels, and that consideration be given to the sorting process that provides the final contamination level of materials prior to marketing.</p> <p>In addition, there is still resident confusion regarding items that are recyclable and those that are not, which further contributes to contamination levels. This is despite significant efforts by the City's solid waste education program to guide residents in the transition to the Recycle BC program. The City suggests that items that are "recyclable" but not part of the Recycle BC program should not be counted as contamination as it is often producers that label items as recyclable.</p>	
Local Government	Contamination	<ul style="list-style-type: none"> <li>• More transparency required in waste audit procedures.</li> <li>• Feedback on contamination types identified in waste audits within streams.</li> </ul>	



		<ul style="list-style-type: none"> <li>Better flow of information to allow collectors to act quickly and identify specific areas/buildings for education/enforcement.</li> </ul>	
Local Government	Streetscape	<p>The Recycling Regulation requires producers to develop a plan to collect packaging and printed paper from residential premises and municipal property that is not industrial, commercial or institutional property; however, Recycle BC has not addressed collection on municipal property and streetscapes to date. The proposed approach for streetscape recyclables collection is a deviation from the current Recycle BC Program Plan in several aspects, and the proposed incentives do not reflect the cost of collecting packaging and printed paper from streetscapes. In addition, the City prefers to see participation in the Recycle BC streetscape collection service as optional. This would provide the City with an adequate timeline to implement streetscape packaging and printed paper collection along with other regional initiatives towards source separation and increased diversion.</p>	
Local Government	Streetscape	<ul style="list-style-type: none"> <li>Incentive offered to carry out recycling is not sufficient to encourage Municipal sign on.</li> <li>Container requirements are onerous and purchase should be supported in full or part by Recycle BC.</li> <li>Yearly audits to be funded by Recycle BC.</li> <li>Reporting is too onerous based on financial incentives proposed.</li> </ul>	
Anonymous	Streetscape	<p>The Recycling Regulation mandated the collection of PPP from residential premises and streetscapes. In its Stewardship Plan, Recycle BC included a qualifying statement related to streetscape collection where they will develop a preferred approach to streetscape collection services which included carrying out pilot projects with stakeholders. To date, Recycle BC has not addressed its obligations on municipal property/streetscape.</p> <p>Concerns:</p> <ul style="list-style-type: none"> <li>Packaging Stewardship Plan: The proposed approach for streetscape is a deviation from the Recycle BC stewardship plan, as the new proposal seeks to offload processing and marketing requirements to collectors rather than using existing post-collection services.</li> </ul>	<p>Recycle BC conducted four pilot projects including a nine-month pilot in the City of Vancouver. More information and reports can be found here:  <a href="https://recyclebc.ca/education/on-street-recycling/">https://recyclebc.ca/education/on-street-recycling/</a></p>

		<ul style="list-style-type: none"> <li>Streetscape Offer: Recycle BC's proposed offer is significantly lower than the costs to provide streetscape collection? If no local government agrees to accept the offer, will the Ministry view this as non-compliance?</li> <li>Proposing that in order to participate in the streetscapes program, municipalities must have certain types of bins. <ul style="list-style-type: none"> <li>This will exclude a number of municipalities from participating in the program.</li> <li>Recycle BC should work with local governments to determine an appropriate approach to developing a streetscapes program that is inclusive of all communities (this has not been the case at all)</li> </ul> </li> <li>Taking the current approach will still result in all costs for streetscape/public space recycling management on local governments.</li> </ul>	
Local Government	Streetscape	<p>Streetscape collection would be an important tool for many communities, especially for communities that support tourism; inviting pedestrian traffic who generate streetscape waste.</p> <p>It would be important for Recycle BC to remain flexible in its approach to this program as not all communities are the same.</p> <p>Some communities are required to ensure that all collection bins use are designed to be Wildlife proof, which means that local Wildlife cannot gain access to waste material stored inside. Preventing the destruction of Wildlife by demanding that waste be stored securely should be a Recycle BC directive for all programs.</p> <p>Recycle BC should also be flexible when it comes to configuring streetscape bin systems. As long as communities comply with cross contamination rules, they must be granted the flexibility to self-determine what waste stream should be collected at each streetscape location. Flexibly to comingle, segregate or not include a waste stream due to a lack of specific waste generated around that location.</p> <p>We look forward to seeing how Recycle BC intends to roll out this program in 2019.</p> <p>Thank you for the opportunity to provide feedback.</p>	
Local Government	Research and Development	<p>The proposed research and development program for additional flexible packaging contains elements that are of concern to the City. In particular, the City is concerned with the proposed use of this material as an alternative fuel source and the potential impacts to the regional air shed. The City questions the claimed environmental benefit</p>	

		of utilizing this material in lieu of coal combustion, considering the increase in pollutants and greenhouse gases. The City has worked on similar air quality concerns with its partners at the Fraser Valley Regional District, who would welcome the opportunity to provide additional information and discuss this matter further with Recycle BC. The City would like participation to be optional in order for municipalities to decide if the program aligns with their respective strategic priorities and community values. The City also encourages Recycle BC to continue to work with suppliers and manufacturers to develop and use packaging that has viable recycling end markets.	
	Marketing and Communications	<ul style="list-style-type: none"> <li>ReCollect: request that Recycle BC share materials lists with member municipalities</li> <li>Recycle BC could do more to educate people about packaging and printed paper. In our community there is a lack of understanding among many about the difference between [question was cut off when exported]</li> </ul>	We will look into the best mechanism to share its Waste Wizard material list
Regional District	Other	You advise that you plan to make formal offers to collectors by summer 2018 and expect answers as early as October 1, 2018. We are concerned that this creates extremely tight timelines for review and recommendations by our Environmental Services Committee and approval by the CRD Board. Would it be possible to provide this information earlier?	Recycle BC is aiming to provide the formal offers and final agreements to contracted collectors in June 2018, which will provide collectors with over three months to review, sign and return the agreements as applicable. Given the time required to properly review the feedback received at the consultation event, adjust the original proposals as applicable and develop the finalized agreement language, Recycle BC is not in a position to provide the final agreements at an earlier date.
Private collector	Other	With respect to feedback on the proposed changes and information presented at the consultation, Emterra would like to comment on the following:	

		<ul style="list-style-type: none"> <li>• We support the proposal for curbside collection fees to be structured based on the container type, not just the material stream. This is a more accurate reflection of operational costs.</li> <li>• Education Top Up and Service Administration Top Up should be offered to organizations who subcontract with Recycle BC directly (not just municipal or First Nations subcontractors). These organizations are doing comparable levels of work but do not receive compensation for it.</li> <li>• We support the proposal for the establishment of thresholds for cross-contamination (both in multi-stream collections and segregated glass). Accordingly, we encourage Recycle BC to revise the definition of “Non-Targeted Material” to include cross-contaminated PPP.</li> <li>• We encourage Recycle BC to frame the conversation around “contamination” based on “Non-Targeted Material”, rather than “Non-PPP”, particularly when discussing operational performance (i.e. measuring collector performance, rate setting, key messages in education, etc.). Non-Targeted Material is a more accurate and real reflection of operational environments (e.g. for all collectors and processors, contaminated PPP is contamination).</li> </ul>	



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230-171 Esplanade West, North Vancouver, BC