



Consultations on the Recycle BC Revised Program Plan Questions and Answers, Phase I

#	Sector	Question	Answer	Reflected in Revised Plan
1.	Local Government	Will the transcript from this webinar be made available to attendees?	The webinar recording and the slides from the webinar are available on this page of the Recycle BC website.	NA
2.	Local Government	Why are you not proposing recovery rates for foam and film? You already have that data available.	What we're proposing for reporting recovery rates on glass, metal, plastic and paper is in line with how these materials are reported by stewards and is in line with what is reported in other Canadian jurisdictions. We believe that moving from reporting overall recovery to this first level of disaggregated categories is a good step and we can at a future time re-evaluate further disaggregation in reporting categories.	Section 5.3
3.	Local Government	Given that Recycle BC has over 3 years of operating data, why has Recycle BC chosen not to establish a performance target for recovery in this Plan?	The Recycling Regulation sets a performance target for recovery at 75% which Recycle BC has achieved for the past three years. In terms of setting a recovery rate beyond 75%, there are a number of factors to consider. We are still evolving our collection system and continue to add communities to the program. At the same time, we continue to build our producer network as there are still a number of companies that have yet to come into compliance. Given these two important factors we believe it is prudent to continue to work toward the recovery rate as set out in the Regulation.	Appendix B
4.	Local Government	What is the rationale behind the requirement for a community to be incorporated to be included in the curbside program?	The new Program Plan attempts to provide more clarity on criteria for new communities in the expansion of curbside service. We believe that when setting this criteria it makes sense to	Section 4.3.2



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			require a community to have a defined area for service and from that perspective we are requiring that these communities be incorporated municipalities with a minimum population of 5,000.	
5.	Local Government	Is there any consideration for those municipalities that have curbside garbage pickup prior to 2014 that have a population of less than 5,000 for providing curbside collection where practical? For example, if the municipality is on the thoroughfare of a current Recycle BC collection route?	As you can appreciate we needed to set an eligibility threshold for community size and a population of 5,000 is what was chosen for providing curbside collection. Recycle BC is however interested in working with smaller communities to establish depots. If in the future the population of a community grew to exceed 5,000 then they would be eligible to receive curbside collection and Recycle BC would look at bringing them into the program.	Section 4.3.2
6.	Local Government	Are existing Recycle BC supported curbside collection programs that do not meet the proposed criteria at risk?	There is no risk to existing collectors who are part of the Recycle BC program despite the changes to our criteria, which applies only to the introduction of <u>new</u> curbside programs. All curbside collectors currently included in the program will have the opportunity to remain. Existing collectors will be offered a contract by the end of the year and unless they decide not to sign the new agreement they will continue to participate with Recycle BC.	Section 4.3.1
7.	Local Government	I am in a community of only 2,000 people. Will we ever be able to participate in the Recycle BC?	If a community with a population of 2,000 had an existing packaging and paper curbside recycling program in place prior to May 2014, that community would still be eligible to join Recycle BC as a curbside program. If the	4.3.2



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			community did not have curbside recycling in place by May 2014, then they would be eligible to join as a depot location.	
8.	Local Government	I'm looking to implement a curbside collection program in an electoral area of a Regional District with a population of 8,000. There is currently no curbside service for garbage or recycling, this would be a new service. Would we be eligible to join the Recycle BC program?	If you were to implement a curbside recycling program it would not be eligible to join the Recycle BC program. It is not the intent of Recycle BC to limit the ability of a local governments to provide that service, however it does not meet the eligibility requirements we have set for providing that level of service. Having assessed data over the past three years and looked at a variety of factors, we believe that depot collection is a more appropriate and effective method of collection for these communities.	Section 4.3.2
9.	Local Government	Can you please clarify if municipalities with less than 5000 population had curbside recycling collection prior to 2014 are they still eligible to be a Recycle BC collector?	If municipalities were offering curbside recycling collection as of May 2014, regardless of their population they would be eligible to join the Recycle BC program.	Section 4.3.1
10.	Local Government	What is the rationale for maintaining the pre-May 2014 collection requirement for program eligibility? If communities have worked hard to build new programs why are they not being given equal consideration for acceptance into the program moving forward? How long will this requirement be maintained, (presumably at least another 5 years)	As you will recall, the Recycle BC program (formerly known as MMBC) launched on May 19, 2014. This is the reason we set May 2014 as the cut-off date for eligibility of current programs. The rationale behind this decision was that we wanted to grandfather existing programs by providing the incentive offer to all programs in operation as of May 2014 to ensure there would be no reduction in curbside service	Section 4.3.1



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			compared to what was in place prior to the launch of the program.	
11.	Local Government	The current program has a 3% contamination threshold penalty. Have you considered more of a range with an incentive as contamination rates fall?	At this point in time that is not something we are considering. However, we appreciate the input and it will be included as part of the consultation feedback. We will consider this approach as we move to finalize the new Statements of Work and Master Service Agreements.	NA
12.	Local Government	Are there any plans to work with First Nations collectors within the plan?	There are some First Nation collectors that are already participating in our program. To further enhance our outreach and our work with First Nations, we played a leading role in establishing the First Nations Recycling Initiative. Recycle BC together with eight other stewardship agencies has retained a First Nations individual that works on behalf of all nine agencies to engage with First Nations communities and determine what stewardship programs can be initiated in those communities. That extends beyond packaging and paper to programs such as electronics, tires, appliances, pharmaceuticals etc. We believe this is a great example of stewardship agencies collaborating to provide a one window approach in working with First Nations communities to create a comprehensive recycling solution.	NA
13.	Local Government	Does RecycleBC have other support materials for local governments to implement supportive policies e.g.,	At this point in time Recycle BC does not have those resources but given the increasing interest by local governments in purchasing	NA



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		purchasing recycled materials to support those markets?	products with recycled content that is a great idea. There could be some benefit in a procurement guide and it might be an interesting project to work on with interested local communities and could be coordinated through the UBCM. We can all recognize the benefit of increasing the recycled content in the products we purchase in order to help stimulate the market for this material.	
14.	Local Government	Will Recycle BC be investigating Parkscape recycling in addition to the work done on Streetscape in the near future?	We consider 'Parkscape' to be included in our streetscape program and as part of the pilot project we placed bins in parks. The results of the pilot project suggest that collection of materials in parks results in a much higher contamination rate than what we see in streetscape bins. Parks will continue to be part of our Streetscape research going forward and we will continue to look at ways in which we can modify the collection in parks to reduce the contamination rate, however, our initial results don't provide a lot of hope for parks as a place where we can collect a clean stream of recyclables.	Section 4.3.6
15.	Local Government	With all of the data that you will have acquired through your streetscapes pilots, you will be able to determine fairly confidently how much packaging and paper is being generated and placed in streetscapes recycling and garbage bins in urban areas. If the offer that you	The challenge with streetscape is to confirm whether it is a viable collection system for paper and packaging and we are committed to continuing to do the work to determine the feasibility of streetscape programs. Our requirement under the Recycling Regulation is to ensure that BC residents have reasonable	Section 4.3.6



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		propose for streetscape recycling is not accepted by the municipality, will you offer to fund the disposal of your obligated materials in the garbage stream?	access to collection facilities or collection points for paper and packaging and we believe that by providing a collection network of curbside, multi-family and depot collection systems we are meeting the required accessibility threshold. There is a requirement in the Regulation to provide streetscape recycling and so we are continuing our research but need to remain focused on financing legitimate collection of packaging and paper and not financing a system that is recovering waste materials. We will work with our partners and local governments to conduct further research and see if there is a way that we can actually collect recyclables from streetscape bins. This work will be carried out acknowledging the ever-tightening market for recyclables and stricter contamination levels.	
16.	Local Government	Can you reiterate if Recycle BC has plans to move from single stream to multi-stream collection programs?	There are no plans to move communities from single stream to multi-stream. With respect to single stream and multi-stream programs, as discussed in our consultation workshops in November, for the most part collectors in our multi-stream program are having more success in achieving the contamination threshold while those operating single stream programs with carts for collection are finding it more challenging. The way we have chosen to address this issue is with our incentive rates which will be discussed further at our future	NA



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			<p>webinar. The current thinking is to increase the differential between the multi-stream and the single stream incentive rates to encourage more collectors to provide multi-stream collection and/or to reward higher performing programs. This approach reflects the fact that the cost of multi-stream programs to Recycle BC is lower due to Lower contamination rates and reduced processing. We would like to reward collectors who have a lower contamination rate and one of the ways of doing that is by offering a much more differentiated incentive rate.</p>	
17.	Local Government	<p>Given the limitation of rural areas under the Recycle BC Plan, (not being included in curbside) would Recycle BC open the program to allow for bulk drop off at depots? Depots have limited effectiveness in rural areas where many residents do not have reliable transportation and distance between depots is far too great for many individuals in rural areas.</p>	<p>At this point in time we would not consider allowing bulk drop-offs. There has been a requirement from the start of the program that depot drop-offs must be done by the resident. What I would suggest is for the Regional District to work with Recycle BC to determine where depots could be established that would allow accessibility by residents for the convenient collection of material. Once depots are established then it is the responsibility of Recycle BC to collect that material from the depot(s) and ensure that it is managed responsibly.</p>	Section 4.3.5
18.	Local Government	<p>Would you allow depots to limit accepting the amount of packaging and paper on each visit? Packaging and paper take much space for depots without much profitability. For example, taking</p>	<p>We are not proposing a limit on the amount of material that depots accept as we want to ensure that the ability to recycle these materials is readily available and convenient for residents. However, in response to feedback we</p>	Section 4.3.5



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		<p>styrofoam or plastic bags is not profitable at all for depot considering labour and space cost.</p>	<p>are doing two things to address the concerns of depot operators related to this issue:</p> <ol style="list-style-type: none"> 1) We are working to expand the number of locations that accept that material in an effort to distribute the volume of material across additional drop-off locations. This includes adding 50 London Drug stores as drop-off locations across the province. 2) We have also heard from depot operators that the incentive rates were not high enough for plastic bags and foam packaging and have proposed major increases to the incentive rates for both these materials. <p>We are still reviewing the feedback received from depot operators in order to make a final decision on the applicable incentive rates.</p>	
19.	Local Government	<p>In the prior Recycle BC Plan, producer tonnage was reduced to account for communities that did not wish to participate in the Recycle BC program. In this version of the plan, similar language is not included (or maybe I missed it). Is Recycle BC discontinuing this practice in the recovery rate calculation?</p>	<p>Recycle BC has never discounted producer tonnage based on the number of communities participating in the Recycle BC program. Our recovery rate has always been based on the total material supplied by our producers and the total material collected by our collectors. However, as a point of clarification on deductions by producers, when producers report their materials on an annual basis they are permitted to deduct from their steward reports the tonnage of material that is collected through the Institutional, Commercial and Industrial (ICI) stream because that is material</p>	Appendix A



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			that is not obligated under the BC Recycling Regulation.	
20.	Local Government	With respect to GHG tracking, further to the previous question on this topic, local governments are currently compiling their 2017 GHG data for reporting to the Province by June 1st. Could you confirm if Recycle BC will be reporting their 2017 GHG emissions, or should local governments who contract with Recycle BC be reporting GHG emissions related to packaging and paper collection in 2017?	Local governments should submit their individual 2017 GHG reports as they have done in the past. In 2018, Recycle BC will share the reporting model it is developing which will require local governments to provide Recycle BC with their 2019 GHG data which will be part of the GHG report Recycle BC submits to the government in 2020.	Section 5.3
21.	Local Government	Are there any plans to share information related to the range of collection services (e.g. manual, automated) that impact contamination to assist local government in decisions around future services?	The pre-consultation workbook that we supplied in October provided an overview of the contamination levels for the different types of collection services. I would encourage you to review this and if you require more information please contact Jordan Best our Director of Collection who would be happy to discuss this further. You can reach Jordan at: jbest@recyclebc.ca or 778-588-9510.	NA
22.	Local Government	How will Recycle BC collect residential packaging and paper, such as yogurt cups, that is dropped off at residents' workplaces?	Any material that is disposed of in a commercial enterprise, even if brought from home to a place of work, is outside the scope of the Recycle BC program. That material would be managed through the Institutional, Commercial and Industrial (ICI) system.	Sections 3.1 and 3.3
23.	Local Government	Is there any interest in allowing commercial entities, for instance fast food restaurants that generate high levels	The material generated at commercial locations such as quick service restaurants falls outside of	Section 3.3



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		of packaging, to channel these materials into the Recycle BC collection system which were deposited on their premises?	the parameters of the Recycle BC program and is managed through the ICI channel.	
24.	Local Government	What's the timeline to begin including commercial packaging and paper into the Recycle BC program or is something dictated by the MOE only	Any decisions regarding the collection of paper and packaging from the commercial sector would be under the purview of the Ministry of Environment. It is not currently obligated material under the Recycling Regulation.	Section 3.3
25.	Local Government	Will Recycle BC give future consideration to allow commercially sourced materials to be processed through your network at the commercial generators cost to take advantage of your economy of scale and encourage higher recycling rates?	Recycle BC is always open to discussions on working with organizations to explore the opportunities to increase the recycling rate in the province of British Columbia. I'm not sure that we would be able to provide the cost savings you expect but we are definitely open to the conversation.	Section 3.3
26.	Local Government	Does Recycle BC have funding available for local governments to conduct waste composition studies at landfills?	Recycle BC does not provide funding for audits undertaken by local governments. As you know Recycle BC conducts its own audits and shares the results of those audits with the communities. If you would prefer to accompany Recycle BC to a facility that is undergoing an audit our field staff will arrange a visit with you so that you can see the material that is being collected from your community.	NA
27.	Local Government	Can you talk more about establishing partnerships with larger retailers, like London Drugs as drop-off locations for material?	Recycle BC has created a framework for establishing partnerships with retailers to collect materials on behalf of Recycle BC. Now that a framework is in place we are happy to have discussions with any retailer interested in exploring that opportunity.	NA



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28.	Local Government	Recycle BC recently asked municipalities to resubmit their costs for operation of packaging and paper recycling at curbside, multi-family and in depots. This was a 'refresh' of the data that was compiled to determine a market clearing offer at the onset of the program in 2014. Why did Recycle BC not also request that their auditor be provided with the costs for streetscape collection in order to determine a fair offer to municipalities for these services in the future? How will Recycle BC determine the offer for streetscapes?	The intent of the request for the costs of operation of curbside, multi-family and depot services was to ensure that when we finalize the incentive rates for curbside and multi-family services that we have the most recent and up-to-date information. We did not include streetscape in that request because we are still working through the feasibility of providing streetscape recycling services. The pressure that has emerged on end-markets makes this work even more important and so we are not yet at the point of requiring streetscape cost data from local governments.	NA
29.	Local Government	Have there been many communities that have changed to accept multi-family (5 or more units) recycling and how did they change to include these in a single stream collection?	There are many communities with multi-family buildings providing single stream service. There are also many communities providing multi-stream service to multi-family buildings – either of these services can be provided very successfully. If a community that is currently offering curbside collection needs assistance in incorporating multi-family buildings we would be pleased to speak with you about that.	NA
30.	Local Government	Do you use community-based social marketing when developing communications campaigns?	Yes, all the communication campaigns we undertake utilize social channels. We do regional and province-wide campaigns aimed at improving recycling habits. We are happy to make our communication campaign assets available to communities if they want to undertake communications at a local level. We	Section 4.7



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			are also happy to work with individual communities to address a specific issue. We also have a Community Champions program, where we provide grants to community-based organizations focused on recycling promotion and education.	
31.	Local Government	<p>What categories in your fee schedule do compostable or biodegradable packaging fit into, do producers pay fees on these products also, even though it is also not accepted on the collection side?</p> <p>Understanding that these materials can be a contaminant in the recycling program, but are also considered a contaminate in most composting streams, would Recycle BC consider collecting these materials as a separate stream at depots in order to properly manage this growing packaging trend?</p>	<p>Members pay fees on all materials supplied to consumers regardless of how it is managed through the recycling, waste or organics stream. Material that is compostable or biodegradable would likely fall within the plastics or paper categories in terms of a fee rate on those materials. As part of the current program plan, we are going to undertake a material audit of the organics stream, where organics are collected as a separate stream through curbside collection in order to gain an understanding of the composition of the organics bin. This will help us understand the proportion of packaging and paper in the organics stream, and within that, the amount that should have been placed in the recycling stream. We are currently in the preliminary stages of deciding the specifics of this audit and will review the findings in order to determine next steps.</p>	NA
32.	Local Government	<p>Every other stewardship program in BC is subject to global commodity prices, and most are managing materials much more difficult to deal with such as hazardous substances. None of these programs have</p>	<p>Recycle BC offers three streams of service, many of them offered in each community and we are adding more communities all the time. It is however important to remember that our mandate is to collect packaging and paper</p>	NA



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		<p>limited their offerings to BC residents based on these challenges such as you are suggesting with the Streetscape collection program. Why is Recycle BC different?</p>	<p>materials and we continue to do the work necessary to determine the best ways of collecting this material. When it comes to streetscape collection – we need to determine if it is the bins that are resulting in high contamination or is streetscape collection just not an appropriate way to collect recyclables. Recycle BC is committed to continuing the work to determine the best channels for collecting packaging and paper materials which are the obligated materials under the Recycle BC program.</p>	
33.	Local Government	<p>With the uncertainty in recycling end markets, has Recycle BC considered reduction targets for material groups, similar to what Manitoba did for bags, or promotion and education efforts aimed at, for example coffee cup use, so that less of this material is produced in the first place?</p>	<p>For clarification, the reduction target for plastic bags in Manitoba was included in the Regulation not the Program Plan. Reduction targets for specific materials are not part of the BC Recycling Regulation and for that reason they are not part of the Recycle BC Program Plan. Recycle BC’s approach to reduction has been to undertake effective consumer-focused promotion and education campaigns targeting certain materials to reduce the generation of specific materials in the system. Most recently we have initiated a campaign for single-use bag reduction encouraging consumers to forego the use of single-use bags in favour of reusable bags. There is also the work of our members who are continually innovating in order to reduce the materials they supply to consumers.</p>	Appendix B



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34.	Local Government	Is Recycle BC going to be involved with developing or working with industry/processors to establish local end-markets in North America, given the restrictions from China?	Please be aware that all the plastics collected in the Recycle BC program are recycled locally in British Columbia through Merlin Plastics. With respect to mixed paper and cardboard, there is a degree of uncertainty right now about the long-term intentions of the Chinese market for these materials resulting in a reluctance to invest heavily in the creation of domestic processors for this material. Given that building, re-opening or retrofitting a paper mill requires a significant investment, we along with other recyclers find ourselves in a holding pattern while we see how this situation unfolds. That being said, Recycle BC always prioritizes domestic markets for its materials.	NA
35.	Local Government	Regarding the recovery rate, is the 75% the target or are you proposing not to set a target?	75% is the target.	Appendix B
36.	Local Government	In the previous plan, some details like accessibility and recovery rate targets were included in the body of the plan. In this plan they are included in the appendix only.	As this is the second 5-year plan, all the start-up language was removed and all the reporting requirements are included in Appendix B which we consider an integral part of the plan.	Appendix B
37.	Local Government	This plan appears to have less detail than the previous plan. Was that deliberate?	In the original plan there was a lot of additional detail provided because we didn't know if we would be able to meet targets. With the track record over the last four years delivering and operating the recycling system we didn't feel having that level of detail was required.	NA



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38.	Local Government	Regarding Streetscape, there seems to be a philosophical difference between the local government perspective and Recycle BC's perspective about how it could be implemented. We understand there has been a change in end-markets that have added an additional level of complexity and uncertainty. Can you give an update on recent thoughts on how Streetscape might work	Recycle BC's concerns remain the same as outlined in the plan: contamination levels are high and marketing materials with a 30% contamination rate is extremely difficult. We don't yet have proof of concept on a streetscape system that delivers low contamination rates, so we may not be able to recycle that material. It's difficult to justify rolling out a program that collects material that can't be recycled, and that doesn't align with our stewards obligations. The quality of material is also declining over time.	Section 4.3.6
39.	Local Government	We understand that the ability to market materials is a challenge. Is there more information that should be in the plan to put more onus on producers to help develop markets or create more local capacity?	We do currently work with producers on a number of projects, but regarding fibre markets it's more of a challenge because of the level of capital investment required. There is also uncertainty with the length of time China's policy will remain in effect, so businesses are unwilling to make that large of an investment without long-term certainty. We don't plan to remove any materials and we've added the collection of Other Flexible Plastic Packaging.	NA
40.	Local Government	You have control over all the fibre coming from around the province. Is there opportunity for a long-term investment or contract with a producer that would allow Recycle BC to be removed from the global market conditions?	Creating a local paper end-market is a significant investment which may not be realistic in today's environment. We do work with producers currently to use recycled content from our program and can continue to pursue opportunities for companies to use our paper as recycled content, but it will take time and packaging changes have long gestation	NA



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			periods so that type of change doesn't happen quickly.	
41.	Local Government	While you are able to continue to market your curbside and multi-family fibre, with the high contamination in the streetscape fibre, has there been any consideration given to composting that material.	We are open to composting and have looked into it for fibre that has moisture content so high it can't be recovered.	Section 4.3.6
42.	Local Government	In your plan it indicates producers pay fees regardless of if the material is getting recycled or not. Is that money going into research and development? Should the plan reflect more how that money is being used?	The Other Flexible Plastic Packaging is an example of trying to move material out of the municipal waste stream. We are trying to reinforce in the plan that whether producers' material is recyclable or not, all producers pay a portion of the cost of the system.	Section 4.9
43.	Local Government	Would you consider defining non-recyclable packaging and paper better for producers and reporting packaging that can't be recycled as disposal to help measure the efforts producers are making to reduce non-recyclable packaging?	We don't know what happens to it if it doesn't end up back in our stream collected, so we couldn't accurately report as disposal as it would be based on assumptions. We are required to report all packaging supplied and collected.	NA
44.	Local Government	Could Recycle BC report on what portion of all obligated material is collected at 1) curbside/multi-family 2) depot 3) not collected at all as a performance measure with an intent to have producers' material all be recyclable over time?	Many producers, in order to do something to affect amount of material supplied, reduce the packaging weight overall. That's led to an increase in Other Flexible Plastic Packaging, which achieves reduction in packaging and is a material we're starting to collect at our depots for research and development.	Section 5.1
45.	Local Government	In the plan it notes one of the criteria in order for municipalities to turn recycling collection services over to Recycle BC is	Typically programs below that threshold are very low density, rural locations where, from our perspective, a depot model may make more	Section 4.3.3



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		that the packaging and paper curbside program achieved a minimum capture rate of 90 kilograms of packaging and paper per curbside household in the previous calendar year. Is there a rationale for that?	sense to service a broader segment of the community, including those residents who may fall outside the curbside service area.	
46.	Local Government	Is it not appropriate in the plan to have clear entry criteria for depots and multi-family collectors to join the Recycle BC program, like there is clear criteria for joining as a curbside collector?	We are looking to bring multi-family in as part of an annual review as an ongoing item. For depot, we look at how many depots we have in a service area/location to ensure adequate service/access.	Sections 4.3.7 and 4.3.8
47.	Local Government	Is the Accessibility Performance of multi-family household units (421,600) what you currently service and the minimum target moving forward over the next five years? Could it be a more ambitious target?	The way the multi-family model is structured, if collectors want to participate, we will provide an incentive. But there are collectors who do not want to participate in the program. In late 2018, Recycle BC will be conducting an analysis of multi-family gaps in our program and will provide offers as part of this review process.	Appendix B
48.	Local Government	There is a cost associated with contamination reduction for local governments. Could Recycle BC do more to support contamination reduction?	Yes, we are developing campaign materials that can be used by municipalities to address contamination, specifically plastic bags, which is our biggest contaminant, and we're open to working with local governments to reduce contamination.	NA
49.	Environmental Non-Governmental Organization	What is the defined timeframe for producers improving packaging?	There is no specific timeframe in the regulation for producers to improve their packaging however we are seeing a lot of innovation taking place by producers who are increasingly designing for recyclability. In addition, there is a significant amount of work taking place by	Appendix B



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			<p>producers at a global level to make all their packaging either reusable, recyclable or compostable by 2025 and we are seeing the benefits of these global commitments locally as well. We will be participating in the next Ellen MacArthur new plastic economy meeting in May and benefit from being part of those discussions. You should also be aware of a number of pilot projects that are currently underway some of which are designed to support producers who are making changes to their packaging and working with them to ensure it will flow more easily through the recycling system. I am encouraged as I see a lot of activity and work in this space.</p>	
50.	Environmental Non-Governmental Organization	<p>What is the fee structure for non-recyclable materials vs. recyclable materials? How much disincentive is there to produce non-recyclable packaging? Seems like this is where Recycle BC could have a big impact on the packaging that is produced.</p>	<p>The material fee rates are designed to allocate costs to materials based on a number of factors including: how much it costs to operate the overall recycling system, how easily or difficult those materials are managed through the system and thirdly, whether those materials attract any commodity revenue. Materials that are not currently managed through the recycling stream still pay fees and are assigned an additional cost which is directed at undertaking the research and development work necessary to overcome the current obstacles to managing that material through the recycling stream.</p>	NA



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51.	Environmental Non-Governmental Organization	Won't collecting multi laminates to burn them conflict with the plan to redesign packaging to be reusable/recyclable/compostable and also risk declining public support and faith in recycling programs? It also conflicts with the commitment MMBC made to not burn materials.	Recycle BC made a commitment in the original program plan to begin collecting all materials by the end of the original Program Plan. For this reason we have initiated the pilot on plastic laminates coupled with research and development in order to determine feasibility of recycling this material and if it can be processed in such a way to meet the specifications of industrial customers who, if they were not using these energy pellets, would be using more carbon intensive fuels such as coal and diesel. We believe this initiative meets the requirements of the program plan to collect this material responsibly and relieve municipalities' responsibility of managing this material through landfill.	Section 5.2
52.	Stewardship Org	In your existing curbside program slide can you explain the second bullet as I don't understand what you mean by adding eligible curbside as soon as possible from a financial perspective?	We are always trying to balance the onboarding of new communities while we work with the government to achieve greater producer compliance. Each year we review our budget with a view to adding new communities to ensure we have the resources to commit to providing service to that community for a minimum of five years. The reference to adding communities as is possible from a financial perspective, refers to striking the appropriate balance between the revenues from steward fees and the number of communities we can support.	NA



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53.	Environmental Non-Governmental Organization	With respect to GHG tracking, will Recycle BC be taking responsibility and reporting all GHG emissions, i.e. collection, processing and transportation to lower mainland? Can you tell us if there is any intention to identify system emissions as local government emissions?	Recycle BC will be reporting greenhouse gases across our entire supply chain and that includes collection, haulage and processing. Since it will be a Recycle BC total system report, local governments who are part of the program will be asked to provide some contributions to that report from a local level which will allow us to calculate the total system GHG impact. At this point, the model is not yet adequately finalized with respect to specifics on the local government emissions but our GHG report will account for Recycle BC's province-wide total supply chain. Recycle BC will share the reporting model it has developed with local governments this year and will ask that they provide their 2019 GHG data to us, which in turn will constitute part of the GHG report Recycle BC must submit to the government in 2020.	Section 5.3
54.	Environmental Non-Governmental Organization	We were under the impression that our input from the November Consultation would be reflected in the new plan. It appears that the issues raised in the consultation session have not been addressed in the plan. For example, depot re-categorization to category 3.	During the consultations in the Fall, Recycle BC proposed an approach whereby Recycle BC would no longer provide incentives to local governments for paper, cardboard and containers collected at their depots where all or a significant majority of those customers have access to curbside or multi-family recycling that accepts unlimited volumes of those same materials directly at their home. The rationale behind this proposal is we do not want to double-pay for both depot collection and curbside collection of the same material. Under	Section 4.3.5



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			<p>that proposed approach, we would continue to support the depot collection of materials not collected at curbside such as plastic bags and glass.</p> <p>These types of specifics are not addressed in the program plan but would be addressed in the new Statements of Work. There is no final decision on this yet as we are still reviewing the feedback received and conducting interviews at a number of depots to determine why residents are taking materials accepted in curbside and multi-family collection to the depot. The consultation feedback and the surveys will further inform a decision on this.</p>	
55.	Environmental Non-Governmental Organization	There is a lower incentive for single stream collection but all collection methods face the same contamination scrutiny/fines. Why not have all collection methods pay the same incentives and then charge a fine if your load is contaminated?	The feedback received from collectors is that they are looking for consistency and predictability in terms of the incentive rate. The incentive rate was designed from the beginning to incentivize collectors to use a collection method that will reduce contamination which leads to a lower processing cost. We have also designed the incentive rate to be as administratively simple as possible and believe that we have struck that balance.	Section 4.3
56.	Environmental Non-Governmental Organization	Why is Recycle BC not paying the full costs to deliver services instead of just offering incentives? If it costs more in a certain area to deliver the service, should Recycle BC not be meeting its obligations under the Recycling Regulation?	We conducted research in 2013 to look at the actual cost of providing recycling services in approximately 26 local governments in BC and we are in the early planning stages of running that research again. One of the findings of the 2013 research was that there is a significant	Section 4.3



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			<p>range of costs between different communities making it very difficult to establish a benchmark cost for collection. The incentive approach to compensating local governments is two-fold: it provides a level playing field in terms of providing all communities with the same incentives while allowing for some differences particularly for community size and density. The second factor in this approach is that Recycle BC has absorbed all the transportation costs associated with the program which for some communities, particularly collectors outside the Lower Mainland and the Southern Vancouver Island, was the largest component of their costs in providing recycling services. So, we have confidence that this two-fold approach of an incentive price plus covering the transportation, processing and sorting costs is a reasonable compensation model.</p>	
57.	Steward	Will China's restrictions cause the steward fees to increase?	<p>There is no doubt that the restrictions imposed by China on the materials they will accept is having a significant impact on the commodity prices of many materials, particularly in Recycle BC's case for paper. For example, the commodity price for recycled cardboard has been cut in half over the last year. Mixed paper is another example of material that has been significantly impacted with the average price received for mixed paper dropping from \$80.00/tonne to recyclers paying \$15.00/ tonne</p>	N/A



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			to have the material taken. As you know the 2018 fees were announced in the Fall of 2017 and those fee rates will not change in 2018, but there may be changes to fees next year	
58.	Packaging Association	While the decision to begin reporting on recovery based on broad categories (paper, plastics, glass, metal) is an improvement from the current situation, it is not consistent with other Canadian programs (Ontario, Manitoba, and Quebec), who have provided the much-needed disaggregated performance (by individual materials) from their onset. Given that Recycle BC uses the material-specific recovery rates to set fees, why not make those public?	Providing recovery rates based on the four material categories of paper, plastic, glass and metal is a practical first step in beginning to provide more detailed reporting for the materials collected. Based on the results of the first disaggregation, we will look at whether it's appropriate to provide further detailed recovery rate information.	Section 5.3 and Appendix B
59.	Steward	Is Alibaba remitting fees on their packaging coming into BC?	Alibaba is not a registered member of Recycle BC. We will follow up with our steward services team to determine if they are already identified as a prospective steward. We are continually working to identify other businesses that are resident in BC and supplying obligated materials to BC consumers and should be part of the Recycle BC program. To review the list of Recycle BC members please click here . The list is updated early each year.	Appendix D
60.	Steward	To follow up on the Alibaba question. We know Amazon has warehouses in all provinces including BC. We know they sell a lot to consumers and most of the	Amazon is a member of Recycle BC and they have been paying fees to the program since 2014. We are continually working to identify other businesses that are resident in BC and	Appendix D



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#	Sector	Question	Answer	Reflected in Revised Plan
		recycling bins in our provinces are filled with packaging from Amazon. It's affecting the fee that everyone else has to pay. Is there anything being done to combat Amazon not paying fees and effecting everyone else's costs?	supplying obligated materials to BC consumers and should be part of the Recycle BC program. To review the list of Recycle BC members please click here . The list is updated early each year.	
61.	Steward	What is the point of the upcoming GHG report?	When the province transitioned the recycling program over to industry they also transferred the responsibility for reporting the greenhouse gas emissions associated with providing residential recycling services to residents of BC. This is a requirement in the Recycling Regulation. During this transition period, local governments will submit their 2017 GHG reports to the ministry as they have done in the past. In 2018, Recycle BC will share the reporting model it has developed which will require local governments to provide us with their 2019 GHG data which will be part of our the GHG report to Recycle BC submits to the government in 2020. Going forward, Recycle BC is responsible.	Section 5.3
62.	Steward	What work is being done to help inform and educate consumers on contamination and how to prevent it and recycle effectively?	There is a lot of work underway to raise awareness with consumers of what does and does not belong in their recycling bin. Recycle BC has created a number of campaigns through social media channels aimed at educating consumers on contamination. There is also a lot of work being undertaken by collectors who are communicating directly with residents when	Section 4.7



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			they see contamination in the recycling bin. They are able to leave notes and educate residents on materials they find in the bin that don't belong.	
63.	Steward	We know from our customers that convenience is key to getting materials and packaging back, will you be expanding or adding more return to retail programs to gather more soft plastic and foam from consumers?	We recognize that convenience is very important for residents and the London Drug drop off sites provide that convenience for many consumers. We are open to other retailers who might be interested in offering a similar service, on behalf of Recycle BC, for the collection of specific materials and have developed a framework for these types of partnerships. We believe that these retail drop-off locations can be a good compliment to the current network of 200 plus depots plus the 50 London Drugs locations across the province collecting specific materials.	NA
64.	Steward	We are changing some of our packaging to be more environmentally friendly but since the categories of plastic are not separated, the fees for those materials are lumped in with other plastics. Is there any plan to separate them and charge a lower fee as incentive to the manufacturer to start using more environmentally friendly materials?	We are involved in a project currently underway being led by Canadian Stewardship Services Alliance called the Material Cost Differentiation Project (MCD). This project is, amongst other things, looking at whether the material categories need to be further disaggregated to better reflect the different ways in which specific materials flow through the recycling system. That project is currently underway and we will update stewards on the findings of the project when we have some results to share.	NA
65.	Steward	Are there any changes to the reporting for Stewardship and CSSA?	There are no changes to steward reporting using the WeRecycle Portal in 2018 unless you	Section 3.2



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			are impacted by the 2017 amendments to the BC Recycling Regulation. The amendments made last year clarified the definition of obligated materials within the paper category. If that is a product category in which you report there is an expanded definition of obligated paper which now includes paper of any description including flyers, brochures, booklets, catalogues, telephone directories, newspapers, magazines, paper fibre and paper used for copying, writing or any other general use. If you report material in the paper category are unclear of your reporting obligations please contact Steward Services at 1-888-980-9549 or by email at stewards@recyclebc.ca .	
66.	Steward	In regards to changes in reporting of printed and paper products, we are unclear on how this will affect our blank artist sketchbooks which is about 20% of our business. Based on the input from Recycle BC (MMBC) when we originally set up our program, we submit recycling fees on all packaging involved with sketchbooks, but when it comes to determined sketchbooks we haven't submitted fees for the blank paper inside these. We essentially have 2 levels of sketchbooks; student/school level which is recycled at the end of term (and we do submit paper fees on these items) and	Based on the definition of obligated materials in the updated Recycling Regulation, if you sell sketch books to consumers you are required to pay fees on both types of sketchbooks, those sold to students and those sold to artists. If the sketchbooks are sold in any other primary packaging or overwrap, that packaging material should be included in your steward report as well. If you want further clarification, please contact our steward services team at stewards@recyclebc.ca .	Section 3.2



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		<p>Artist level which is kept for long term keepsake/inspiration (which we currently don't submit). With the changes, can you clarify if we are now required to submit fees on all levels of sketchbooks? If not able to do at this time, can you have someone follow up with me after this webinar?</p>		
67.	Steward	<p>Would you not consider (in the absence of downstream markets for film) that Energy from Waste provides the same benefits for clear bags just mentioned for multi laminates?</p>	<p>We have looked at the fuel pellets as an option for the management of a limited number of obligated materials in order to meet the commitments under our program plan. With respect to the blue bags for collection, they are not an obligated material because they are a product as distinct from packaging. They are, however, being used on a discretionary basis by our collectors. As previously discussed, our processors have indicated that there is limited ability to recycle these bags and so as we standardize our system, it is preferable to move to reusable collection containers rather than look for a solution for a material which is not obligated under the Recycle BC program.</p>	NA



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68.	Steward	<p>As past studies and resources presented (Nov 2017) illustrated higher diversion (net of contamination) with the utilization of “see through” blue bags over other systems (especially carts), do you not consider it more beneficial to maintain this option and further explore down stream markets (film), rather than force conversion from existing program(s). The blue bag (film) component of the film stream is a small portion when compared to the other film (grocery carry out sacks) in the mix. Why not allow the “blue bag as a collection mechanism but proceed with banning of grocery sacks? Cost efficiency for stewards and environmental benefits for municipalities are being impacted with the exclusion of the blue bag option.</p>	<p>The feedback we have received from our processors is that a very small proportion of the blue bags are being recycled. This has informed our proposal to remove single use blue bags as collection containers by July 1, 2020 and ask collectors to transition to reusable containers by that date. Additionally, we feel strongly that this is the right decision from an environmental perspective as we try to create a closed-loop sustainable system for the materials collected. It’s important to note that none of the highest performing curbside programs (kg collected per household per year, net of contamination) in BC currently utilize single use blue bags as collection containers. The suggestion that these bags produce higher diversion rates compared to other container types is not borne out in BC.</p>	NA
69.	Steward	<p>Interest remains strong from numerous communities to continue to allow residents the opportunity to use “see through” blue bags. These comments were also raised during the Fall consultations. We are not seeing this option being sustained. Is this something that will be discussed as part of the June / July Statement of Work discussions?</p>	<p>The type of collection container used for the collection of recyclables falls under the purview of the Statement of Work and Master Services Agreement. It remains Recycle BC’s intention to initiate a phase-out of the use of blue bags. Our rationale, as we discussed at the consultation, is that our analysis indicates that these bags are not recycled and given that Recycle BC is a recycling and sustainability organization our preference is to move away from single-use collection containers.</p>	NA



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70.	Steward	You had previously mentioned on the call that producers are required to eliminate certain packaging materials by a certain timeline. Could you elaborate?	It was not my intention to state that producers are being required to eliminate certain packaging materials. Rather, some companies have made voluntary long-term commitments around the recyclability of their packaging materials and information about these initiatives is provided in our Annual Report each year. That said, these measures are not required by the BC Recycling Regulation, nor are they a requirement of Recycle BC's Program Plan.	Section 5.2
71.	Steward	You said Recycle BC has been or will be working with suppliers on refining packaging materials. Can you share any successes out of that thus far (if applicable)? Also, do you plan to create awareness campaigns to communicate those innovations/changes?	We have worked with some members to determine if packaging changes they have made or intend to make will be acceptable within the Recycle BC collection system. In addition, we have a pilot that will launch shortly working with a group of producers focused on a specific packaging type that currently has a high residue rate. The intent of the pilot is to determine if there is an opportunity to more effectively communicate with consumers the need to reduce product residue so that the material can be successfully recycled. We believe that Recycle BC has a unique opportunity to undertake projects such as this with producers and provide them with real-world conditions to determine compatibility of their packaging in the recycling system.	Section 5.2