



Recycle BC Program Plan Collector Consultation, July 18, 2018

| | Sector | Question | Answer | Reflected in Revised Program Plan or other Documents |
|-----------|------------------|---|--|---|
| 1. | Depot Operator | While we know Recycle BC is acting on the Ministry of Environment regulation which requires collection of residential packaging, the world expects collection and recycling of all plastic. The 75% diversion target ignores IC&I materials, plastic and non-packaging plastic products. This dilutes the actual diversion to perhaps 10% of the plastic available on the market. Much of the non-packaging plastic, such as laundry baskets and dustpans are sold by Recycle BC members. Will Recycle BC expand the scope of the program to collect all recyclable plastics? In our community, IC&I plastics go to the landfill for lack of a better option. To meet the Plastics Charter goal, we must look at the total picture. | Thank you for your feedback. The Environmental Management Act and Schedule 5 of the BC Recycling Regulation provide guidance on the designated materials for the Recycle BC program. As currently written this does not extend to durable household products such as laundry baskets and dustpans but we will forward your comments to the Ministry of Environment and Climate Change Strategy as part of this consultation. | Part 3, Section 3.1, Packaging and Paper Product Extended Producer Responsibility Plan (July 2018). |
| 2. | Local Government | Are wooden utensils and paper plates included as new obligated items now? | We anticipate that paper plates will be included as a designated material. We will be working with the Ministry of Environment and Climate Change Strategy over the coming months to determine the list of designated materials and will be providing guidance on that list following approval of the plan. | Part 3, Section 3.1, Packaging and Paper Product Extended Producer Responsibility Plan (July 2018). |
| 3. | Local Government | Section 4.1 of plan says that Recycle BC will focus on outcomes not process. Does that | Recycle BC has always been open to the concept of contracted depot collectors | Part 4, Section 4.3.8, Packaging and Paper |



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| | | mean there will be more flexible collection schemes available to rural and small communities, such as a bulk drop-off from satellite depots? | operating satellite depots under our program. The new version of our depot agreements which were recently released, as well as this new program plan, places a greater emphasis on this approach. | Product Extended Producer Responsibility Plan (July 2018). |
| 4. | Local Government | Can you please tell us if your First Nations consultant is working with Indigenous and Northern Affairs Canada (INAC) to collaborate on recycling initiatives? Many Kitimat-Stikine First Nations communities are currently working with INAC on PPP recycling initiatives and pilot projects. This process is in the early stages and so now is a good time for collaboration with Recycle BC on all these initiatives. | Recycle BC has had preliminary discussions with Indigenous Services Canada (ISC, formerly INAC) and will continue to work with them on recycling initiatives for First Nations communities. | Part 4, Section 4.3.9, Packaging and Paper Product Extended Producer Responsibility Plan (July 2018). |
| 5. | Local Government | Markets for recycling materials is a key issue and challenge, particularly recently. What research or actions is Recycle BC taking to guard against the lack of viable markets? | Identifying suitable end-markets for Recycle BC's materials is a central focus of our work right now and will continue to be as we face ongoing challenging market conditions. Despite these current challenges, Recycle BC does have some advantages with its program. One such advantage is that a large portion of materials are collected in multi-stream or depot-segregated collection systems which reduces the contamination level improving the marketability of the material. We are also fortunate to have a plastics recycler | Part 4, Section 4.4, Packaging and Paper Product Extended Producer Responsibility Plan (July 2018). |



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| | | | located in the province with whom we work closely to explore solutions to addressing difficult to recycle plastics. This has enabled us to conduct the pilot project on recycling Other Flexible Plastics so that this material can be diverted from landfill and moved up through the pollution prevention hierarchy. We expect to continue this type of work to address other difficult-to-recycle plastics. For fibre materials, we are working with our post-collection service provider to identify suitable and certified end-markets for this material in order to understand current material specifications and how we can meet those requirements. This is part of Recycle BC's daily work and we are committed to finding suitable markets for the materials collected. | |
| 6. | Local Government | Should there not be a section added to the plan that outlines a market development strategy to identify specific actions in this regard? | There is no single strategy in the plan due to the ever-evolving market conditions. We have, through our post-collection service provider, a responsibility to market the recyclables collected and we are always exploring available markets and their material specifications. We are committed to ongoing research and development so that we can learn what developments and | Part 4, Section 4.4, Packaging and Paper Product Extended Producer Responsibility Plan (July 2018). |



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| | | | investments are needed to advance material up the pollution prevention hierarchy. | |
| 7. | Local Government | We support the addition of targets for individual material streams. Please confirm if foam is included in the rigid plastics target and if not, why did you decide to exclude extruded polystyrene foam? | Foam is included in the rigid plastics target. | Part 5, Section 5.3.2, Packaging and Paper Product Extended Producer Responsibility Plan (July 2018). |
| 8. | Depot Operator | What is the current recovery rate for foam packaging by Recycle BC? | Under the revised plan Recycle BC will publish the recovery performance for paper, plastic, metal and glass, as well as for rigid and flexible plastics. | |
| 9. | Local Government | On Page 21 in the Recycle BC 2017 Annual Report, there is data that outlines the portion of material that is recycled, the portion sent to energy from waste and the portion sent for disposal. This table indicates 11,568 tonnes is sent for disposal. Can you please clarify what is included in the material that is sent for disposal? | The 11,568 tonnes of material that was sent for disposal in 2017 includes both PPP and non-PPP -- for example, there will be a small amount of PPP that is too contaminated to recycle as well as non-PPP. We do not have data on the actual composition of the material sent to disposal. By observation, we know that most is material that residents believe belongs in their recycling bin but is not a designated or recyclable material and should have been placed in their garbage bin. Recycle BC commits significant efforts through its promotion and communication campaigns to educate residents on what does and does not belong in the recycling | Page 21, Recycle BC 2017 Annual Report |



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| | | | system in order to reduce the quantity of material sent to landfill. | |
| 10. | Industry Association | Page 21 of the 2017 Recycle BC Annual Report provides data regarding the quantity of material supplied into the marketplace by Recycle BC members (234,847 tonnes) and the total amount of material collected by Recycle BC (174,942 tonnes). Can you please clarify what is included in the 174,942 tonnes? | The 174,942 tonnes referenced in the 2017 Annual Report is the quantity of material collected through the Recycle BC program on behalf of our members. Please note that the 174,942 collected tonnes provided in the annual report reflect the exclusion of tonnes collected by Recycle BC on behalf of other stewardship programs. | Page 21, Recycle BC 2017 Annual Report |
| 11. | Industry Association | Footnote 18 in the program plan, which was also included in the earlier draft of the updated plan, refers to the streetscape collection program. It states that the ability of a streetscape program to produce a reasonable amount of recoverable PPP is subject to proof of concept through testing effective delivery of streetscape collection systems. Could you please provide some criteria on how Recycle BC will determine if a streetscape program is considered successful or not? | The success of a streetscape collection program will be based on the quality of the collected material and therefore its marketability. In the current market conditions, there is no market for highly contaminated material and therefore the proof of concept is based on the current market requirements. One of the new specifications that has been introduced by end-markets, in addition to the strict limitations on contamination, is a limit on moisture content. Our streetscape pilot project showed that there is not only a high level of contamination but also a high level of liquid that is unacceptable to end markets. Footnote 18 which references the proof of concept refers to the ability to | Part 4, Section 4.3.10, Packaging and Paper Product Extended Producer Responsibility Plan (July 2018). |



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| | | | develop a streetscape collection program that can meet the current end-market requirements providing us with certainty that the collected material will be recycled and not sent to landfill. | |
| 12. | First Nations | Is there a limit on the distance between satellite depots and principal depots? Also, is there a limit on distance between principal depots? | Recycle BC has not set a specific standard with respect to distance between principal depots and the distance between satellite depots and principal depots. However, it is important that depots not be located too closely together so that they don't cannibalize each other making some depots unfeasible due to a low volume of materials. Recycle BC looks at the size of the population that the depot will service and the location of other depots in the region and assesses feasibility based on a judgement of those factors rather than setting a specific standard for distance between depots. | Part 4, Section 4.3.8, Packaging and Paper Product Extended Producer Responsibility Plan (July 2018). |
| 13. | First Nations | Can you please provide more details on the concept of satellite depots? Would they collect the same materials as principal depots with the material then transported to the principle depot? | The operator of a satellite depot would determine which of Recycle BC's designated materials to collect. Residents would deliver those materials to the satellite depot and then the depot operator would transfer the collected material to the principal depot where it | Part 4, Section 4.3.8, Packaging and Paper Product Extended Producer Responsibility Plan (July 2018). |



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| | | | would enter Recycle BC's post-collection network. | |
| 14. | First Nations | Is there any provision in the new plan which would allow one resident to collect recyclables from other residents and deliver it to the depot on their behalf as opposed to each resident delivering the materials individually? | Recycle BC's requirement for depot service is that each resident must deliver their own recyclables to the depot. The reason for this is that it allows depot staff to speak with residents and educate them on which materials are recyclable, where they should be placed in the depot and answer any questions they may have. We are however open to discussing other solutions for First Nations communities in light of the discussions currently taking place with Indigenous Services Canada. | Part 4, Section 4.3.8, Packaging and Paper Product Extended Producer Responsibility Plan (July 2018). |
| 15. | Environmental Non-Governmental Organization | There are packaging types currently labelled long-term storage devices such as plastic drill cases, tape dispensers, CD cases, etc. Can these items be added to the expanded list of designated materials? | Recycle BC has not yet confirmed the list of designated materials under the new program plan but will work with the BC Ministry of Environment and Climate Change Strategy in the coming months to finalize that list. We will provide detailed guidance to contracted collectors once the expanded list of designated materials is available. | Part 3, Section 3.1, Packaging and Paper Product Extended Producer Responsibility Plan (July 2018). |
| 16. | Local Government | Can you please provide information about any plans to create reduction targets for certain materials? The City of Vancouver has been working on reducing single-use items and also has a Zero Waste 2040 plan. We appreciate | We do not have plans at this time to include reduction targets in the program plan. We are however very pleased with the results of the single-use bag reduction campaign and are discussing the possibility | N/A |



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| | Recycle BC's work on developing a single-use plastic bag campaign with Retail Council of Canada and are wondering if you have plans to implement reduction targets for specific types of PPP? | of enhancing and repeating that program. We are also exploring other items that might be appropriate to target with that type of campaign. | |
| 17. | Local Government Does Recycle BC have plans for increased resident promotion and education efforts when a decision is made to remove a material from the recycling system? For example, the recent decision to no longer accept pet food bags required an increase in consumer education to ensure residents understand this change. Can you make a commitment in the Plan to increase the P&E efforts whenever such a change is made? | Recycle BC understands the need to create targeted communication when a change such as removing pet food bags from the recycling system takes place. This is very important in order to ensure the material that is collected is marketable. We use many different channels for resident communication including social media, advertising and targeted campaigns. The program plan outlines a commitment by Recycle BC to undertake research that will provide insights on specific materials that either have a lower than desired recovery rate or are a consistent contaminant in the system and to produce targeted campaigns for such materials. | Part 4, Section 4.7, Packaging and Paper Product Extended Producer Responsibility Plan (July 2018) |