



	Sector	Question	Answer	Reflected in Revised Program Plan or Other Documents
1.	Steward	Will the Environmental Management Act be amended to support the expanded definition of obligated material — both products that might be considered packaging, as well as items such as utensils and straws that are clearly not packaging — as outlined in the draft Program Plan?	The Ministry considers the current definition of packaging, as it is found in the Environmental Management Act, sufficient to designate packaging-like product that is used to protect, contain or transport a commodity or substance, under Schedule 5 in the Recycling Regulation. With respect to plastic single-use items, bringing these materials under an Extended Producer Responsibility program for their management is a logical and effective province-wide approach that is supported by the Ministry of Environment and reflects Recycle BC's members' plastics recycling objectives as well as a key policy approach for meeting Canada's commitments on plastics as set out in the G7 Plastics Charter. That said, we welcome feedback from stewards and other stakeholders on inclusion of single-use plastic items in the revised Plan. Based on stakeholder feedback, the Ministry will decide if the Act or the Regulation will be amended to more clearly articulate single-use items, as is being contemplated in other jurisdictions.	Part 1 of the Environmental Management Act, definition of 'packaging'.
2.	Industry Association	Regarding the broadened scope of the program, can you please confirm that straws are now an obligated material? And can you clarify that this includes	We will be providing stewards with more specific guidance with respect to all designated material in the coming months. But our initial conversations with the Ministry of Environment	Part 3, Section 3.1 of Packaging and Paper Product Extended Producer



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		the straw that comes with a juice box which would require the steward to report the juice box and the straw separately?	indicate that straws, including those attached to a juice box, will be a designated material.	Responsibility Plan (July 2018).
3.	Industry Association	What is the rationale for obligating single-use plastics for the 2019 report (based on 2018 sales) when the forthcoming implementation of municipal bans will mean a decline in the distribution of these materials?	We acknowledge that some jurisdictions may be taking action to address specific single-use plastic products as part of a local response to the growing concern about plastic pollution. However, local bans do not preclude the need for a more comprehensive approach to addressing these items. Bringing these materials under an Extended Producer Responsibility program for their management is a logical and effective province-wide approach that is supported by the Ministry of Environment.	Part 3, Section 3.1 of Packaging and Paper Product Extended Producer Responsibility Plan (July 2018).
4.	Industry Association	Much of the contamination found in streetscape collection is single-use plastics. How will Recycle BC manage this material now that it is obligated if it is currently considered a contaminant in the system?	The first priority for Recycle BC is to develop the complete list of designated materials and then identify which of those materials might pose a challenge in our supply chain. Once we understand which items are problematic, the Recycle BC team will take an approach similar to the tubes pilot project and work with our supply chain partners to explore technologies to manage these materials through the recycling system. Read more about our tubes pilot project here: RecycleBC.ca/Tubes	N/A
5.	Steward	Can you explain why Recycle BC is choosing to follow EU targets that can	Recycle BC's overarching goal is continuous improvement. Given that the program has been	Section 5.3.2 of the Packaging and Paper Product



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		be applied nationwide in each EU country for one province? Would it not make more sense to wait until a national target is set for Canada?	consistently achieving the 75% recovery rate as required by the Recycling Regulation, stakeholders, including the Ministry of Environment, have provided clear feedback that more ambitious recovery rates should be part of the updated Program Plan. We reference the EU targets, as well as the targets in the G7 Plastics Charter in the plan to demonstrate to that Recycle BC's targets are consistent with international and national efforts.	Extended Producer Responsibility Plan (July 2018).
6.	Steward	In calculating recovery rates, it may be a reasonable approach to include in Recycle BC's recovery rates the beverage related plastic reported by Encorp Pacific. Recycle BC and Encorp Pacific could combine their recovery rates similar to the approach taken in the EU.	You are correct that the EU aggregates performance from all programs managing the same material. When referencing both the Encorp Pacific Annual Report and the Recycle BC Annual Report, the combined recovery rate for plastics is approximately 48%. Recycle BC members supply about 80% of the plastics in the province and our plastic recovery rate is 41% so there is work to do. In the interest of continuous improvement, Recycle BC believes that by continuing to set ambitious recovery targets it can contribute to improving the recovery of all formats of plastic packaging in British Columbia.	Section 5.3.1 and 5.3.2 of the Packaging and Paper Product Extended Producer Responsibility Plan (July 2018).
7.	Steward	The recovery target for flexible plastic packaging is 22-25%. This material currently has the highest fees and a recovery plan has been outlined. What is Recycle BC's plan to educate	Recycle BC launched a pilot project for "other flexible plastic packaging" in 115 depots earlier this year. The pilot project is testing not only the sorting and processing of this material, but also the consumer education, signage and	Section 5.3.2 of the Packaging and Paper Product Extended Producer Responsibility Plan (July 2018).



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		consumers about the recyclability of this material and what is the plan to increase the recovery rate?	related promotional and education materials. We will continue to educate consumers on the availability of recycling options for this material as the program expands to all depots in January 2019. With the expansion of the program to all depots, Recycle BC will be able to extend its communications reach to residents across BC.	
8.	Industry Association	How do you determine which broad category (paper, plastics, glass, metal) composites fall into for performance and reporting purposes?	The performance reporting for material categories follows the reporting categories used by stewards to submit their annual steward reports. Aseptic and Gable Top containers are reported under the paper category.	Section 5.3.2 of the Packaging and Paper Product Extended Producer Responsibility Plan (July 2018).
9.	Steward	Current plastic recycling efforts have been restricted to "mechanical/optical" sorting and repurposing. What provisions for other forms of recovery (chemical / gasification / waste-to-energy etc.) are being supported by Recycle BC?	Recycle BC is responsible for the recovery of designated materials and ensuring these materials are sent to approved recycling endmarkets. Recycle BC keeps up to date on recycling technologies and methods and will support emerging technologies and innovations.	Part 5.2 of the Packaging and Paper Product Extended Producer Responsibility Plan (July 2018).
10.	Industry Association	For accessibility measurement purposes, how are "urban" and "rural" defined?	Urban and rural accessibility is defined by census classification.	Section 4.3.8 of the Packaging and Paper Product Extended Producer Responsibility Plan (July 2018).
11.	Steward	Could you give a bit more information about the Streetscape project? What is that project and how does it affect the producer?	There is a requirement in the Recycling Regulation that Recycle BC provide streetscape recycling services for packaging and paper products and that Recycle BC stewards fund this work. In 2014, 2015 and 2016-2017, Recycle BC	Part 4, Section 4.3 of the Packaging and Paper Product Extended Producer Responsibility Plan (July 2018).



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			undertook - pilot projects to determine how it can recover a clean stream of paper and packaging materials from streetscape locations. The initial work indicates that material collected from streetscape has a very high level of contamination compromising its ability to be recycled. Despite these early results, Recycle BC is committed to continuing to work in partnership with local governments to perform further research through streetscape collection projects to determine how recovery of packaging and paper can occur under the new restricted global marketing conditions. More information about this pilot project is available here: Streetscape Pilot Project Report.	
12.	Steward	Are any of the proposed changes to the Program Plan going to affect stewards and if so, how?	The proposed updates to the program plan will impact stewards in a number of ways which we are happy to discuss with you. Please feel free to contact Recycle BC at 1-888-980-9549 or stewards@recyclebc.ca . Most notably, stewards will be reporting against an expanded scope of obligated materials and Recycle BC will provide stewards with the list of designated materials in the coming months. The new performance targets, provided in the plan, are also expected to increase program costs over time. More details about anticipated costs will be provided at the Annual Steward Meeting on October 24, 2018. Please stay tuned for more details.	



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13.	Industry Association	In the spirit of transparency, are you going to be reporting the fees related to each category and the tonnage introduced into the province in each annual report?	Under the revised Program Plan, Recycle BC will begin by providing recovery rates for paper, plastic, metal and glass, as well as for rigid and flexible plastics. Based on the results of this first level of reporting, we will determine if it is appropriate to provide further detailed recovery rate information, as the program matures. As for the inputs to fee setting, Recycle BC will consider your request to publish the information used to set fees.	
14.	Steward	With respect to the challenge of local definitions, is there a federal/provincial/territorial process underway which is attempting to implement a national approach to extended producer responsibility? A national approach would lessen the burden on stewards who are required to adhere to different program structures implemented by different provinces.	We understand the need for harmonized definitions in order to simplify reporting obligations for stewards. It is our hope that the Plastics Charter and the federal government's plastics strategy will kick start the harmonization of definitions. We are also optimistic that the work being undertaken by the Canadian Council of Ministers of the Environment (CCME) will also help to advance the harmonization of definitions. In the meantime, CSSA remains focused on doing its part to provide stewards with a one-stop-shop platform of support services to help you fulfill your stewardship obligations in jurisdictions across Canada. This platform provides the option to use a standardized single 'national' material list when submitting reports to all provinces. In making this selection, stewards	N/A



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			can report against one list and the WeRecycle system will map the national material to the relevant provincial program material.	
15.	Industry Association	Will Recycle BC work with local governments to determine a definition of compostable as currently each local government defines it differently?	Recycle BC is committed to developing a harmonized definition of compostable. The Ontario government recently issued a draft definition of "compostable" and Recycle BC will review this document with an aim to harmonizing the definition not only across local municipalities but also across provinces. Recycle BC will work with local governments to understand how this material is being managed through the collection and processing systems. Our first priority is to determine how much of this material is in the organics stream and how it is currently being managed.	Part 5, Section 5.1 of the Packaging and Paper Product Extended Producer Responsibility Plan (July 2018).