



**RECYCLEBC™**

**Recycle BC**

**STREETSCAPE RECYCLING**  
**Program Design and Financial Incentive**

Consultation Report

September 2020

## Contents

SECTION 1: Introduction.....	3
1.1 Streetscape Recycling: Program Design and Financial Incentive .....	3
1.2 Project Background.....	3
SECTION 2: Consultation Process .....	4
SECTION 3: Consultation Participation.....	5
SECTION 4: Summary of Consultation Feedback Themes.....	5
Appendix A – Consultation Webinar Q&A .....	7
Appendix B – Written Feedback Submissions .....	14

## SECTION 1: Introduction

### 1.1 Streetscape Recycling: Program Design and Financial Incentive

Recycle BC outlines its approach to streetscape collection in its program plan<sup>1</sup>. The province of BC's Recycling Regulation with respect to the packaging and paper product category (PPP) requires the director's satisfaction that the plan adequately provides for the collection of the product by the producer (i) from residential premises, and (ii) from municipal property that is not industrial, commercial or institutional property. The latter, comprised of sidewalks, plazas and parks, is referred to as 'streetscape' in Recycle BC's stewardship plan.

Recycle BC's program plan commits that should streetscape produce a reasonable amount of recoverable PPP, subject to proof of concept through testing the effective delivery of streetscape collection systems and the recycling of the material, Recycle BC will consult on the program's design and financial offering.

Recycle BC's pilot studies demonstrated PPP material can be collected but it is poorly sorted, heavily contaminated, wet with residual liquids and unclean with food waste. Hazardous material can also be present. Results of the local government streetscape survey in 2019 showed that in some municipalities as much as 100% of the material collected through streetscape is sent to landfill and, on average, local governments recycle only a very small amount. Streetscape represents a greenhouse gas emission-intensive process, as a very small volume of materials is transported to multiple locations only for the majority to end up in landfills. Streetscape receptacles can have benefits to local governments in litter abatement, collection of bottles & cans with little contamination, and meeting public expectation for a green community. However, Recycle BC's opinion following extensive roundtable discussions, data analysis and consultation is that the streetscape recycling of packaging and paper product currently has no proven net positive environmental outcome.

The presentation of a program design and financial incentive for streetscape was requested by the Ministry of Environment & Climate Change Strategy (MOECCS) as part of its program plan review and approval process.

### 1.2 Project Background

Recycle BC organized a roundtable discussion series in 2019 focused on the topic of streetscape packaging and paper recycling. Recycle BC engaged a third-party organization, Alces Technologies Inc., to facilitate the six roundtable sessions among local government representatives in BC. Municipalities within BC came together to discuss a suitable recycling or recovery model and inputs to inform the development of a financial incentive offer for Recycle BC streetscape material, assess current and historical findings from local governments with streetscape programs, and find consensus on best practices for execution.

---

<sup>1</sup> Recycle BC's program plan can be found at: [https://recyclebc.ca/stewards/regulation\\_and\\_stewardship\\_plan/](https://recyclebc.ca/stewards/regulation_and_stewardship_plan/)

Twenty-seven of the 31 eligible<sup>2</sup> municipalities participated in some form for the duration of the series from May to November 2019. At least 50% of invited municipalities attended a majority of the sessions held by webinar (3), and in-person (in North Vancouver, Burnaby, and Kelowna). Representatives from the Extended Producer Responsibility (EPR) branch of the Ministry of Environment and Climate Change Strategy (MOECCS) also participated in the roundtable series and presented during the second in-person session.

Extensive information collection exercises with the municipal partners occurred during the series in the form of surveys, polls, and facilitated discussions, and additional research was conducted to inform the ongoing discussions. Recycle BC greatly appreciates the information and feedback provided by each participating municipality throughout the duration of the streetscape recycling roundtable discussion series. A 55-page study report<sup>3</sup> published February 2020 is available on Recycle BC's website.

The next project step was a consultation to review the round table findings and propose a streetscape design and financial offer to collectors. The program design proposed was constructed to have a measurable assessment of streetscape PPP recycling and a financial transaction for services that is verifiable conforming to expectations set out in the Regulation.

The consultation webinar was held July 22, 2020.

## SECTION 2: Consultation Process

Recycle BC's consultation process for its 2020 streetscape recycling: program design and financial incentive review was as follows:

### 1. Consultation Invitation

- Recycle BC reached out by email on June 22, 2020 with a streetscape recycling consultation *Doodle* Poll to all 31 eligible municipalities to indicate interest and availability to attend the consultation across a range of potential dates and times.
  - The group's preferred date and time in the *Doodle* Poll was Wednesday July 22 at 11:00 am PT.
- On July 7, 2020 Recycle BC sent by email an invitation to register for the consultation to be held July 22 via a ZOOM webinar.
- On July 21 Recycle BC issued a reminder email.
- The MOECCS was invited to attend the consultation as an observer.

### 2. Consultation Webinar

- Recycle BC's consultation webinar provided an overview of streetscape recycling, a recap of the 2019 round table series and a summary of Recycle BC's considerations in developing its proposal. This webinar outlined the new proposed program design and financial incentive. It concluded with a question and answer period.
- Recycle BC held its consultation Wednesday July 22 from 11:00 a.m. to 12:00 noon PT.

---

<sup>2</sup> Eligibility standard: urban commercial areas with business activities that generate large amounts of PPP within municipalities with a population of 20,000 or more and a population density of 200 or more people per square kilometre.

<sup>3</sup> Recycle BC's streetscape report can be found at: [http://recyclebc.ca/wp-content/uploads/2020/02/Streetscape-Roundtable-FinalReport\\_25Feb2020.pdf](http://recyclebc.ca/wp-content/uploads/2020/02/Streetscape-Roundtable-FinalReport_25Feb2020.pdf)

- The PowerPoint presentation<sup>4</sup> was posted on Recycle BC’s website following the consultation webinar.
3. Feedback Process
- The webinar agenda provided time for participants to ask questions, which were answered during the webinar. The Q&A was posted on Recycle BC’s website alongside the webinar post. It is documented in Appendix A.
  - Following the consultation webinar there was a two-week consultation feedback period which ended Friday, August 7, 2020 (August 19, 2020 for one participant).
  - An email address was provided for written feedback to ensure that all comments were captured: [consultation@recyclebc.ca](mailto:consultation@recyclebc.ca)
  - During the webinar, Recycle BC noted that specific feedback by collectors is essential to the consultation process.
  - Consultation feedback received is documented in Appendix B.
4. Consultation Report
- The feedback received was reviewed in detail by Recycle BC and considered against the proposed program design and financial incentive offer.
  - This September 2020 report summarizes Recycle BC’s consultation process for its 2020 streetscape recycling: program design and financial incentive review. It is posted on Recycle BC’s website.

### SECTION 3: Consultation Participation

Streetscape Recycling: Program Design and Financial Incentive Review - Wednesday July 22 from 11:00 a.m. to 12:00 noon PT.

Sector	Registered	Attended	LGs Represented
Local Government	35	26	16
MOECCS	2	2	-
Recycle BC/CSSA	7	5	-
Anonymous by Phone	-	2	?
<b>Total</b>	<b>44</b>	<b>35</b>	<b>16</b>

### SECTION 4: Summary of Consultation Feedback Themes

Written feedback was received from four collectors. Their written feedback and Recycle BC’s response can be found in Appendix B of this report.

The feedback received had four main themes:

1. Organics
  - Feedback: Two local governments provided feedback on their program design of including soiled and unsoiled paper in the green organics’ receptacle for end fate composting and want this element to be allowed as multi-stream collection.

---

<sup>4</sup> Recycle BC’s streetscape recycling consultation webinar can be found at the bottom of this page: <https://recyclebc.ca/recyclebc-consultation/#Financial>

- Recycle BC consideration: We haven't yet determined how to address an organics stream as the OMRR revisions have not been implemented to add paper as an acceptable material for organic collection. Currently, under OMRR, paper is a contaminant. Once OMRR is revised to include paper as acceptable for compost recycling, Recycle BC will revisit this element in its proposal as part of multi-stream collection.
2. Annual Audit
    - Feedback: Three local governments requested more information on the audit process.
    - Recycle BC consideration: The audit will have a format - by sample size, materials and weights - for a common methodology and to compare/compile audit results. The size of the sample will in part be determined by how many stations/receptacles there are for collection. It will be a representative sample of streetscape collection containers on, at minimum, an annual basis, in order to calculate the amount and type of contamination in the collected material.
  3. Processing
    - Feedback: Two local governments queried why Recycle BC would not provide access to end processors.
    - Recycle BC Consideration: A local government may choose to use the same processor under a separate contract with the local government as, for example, would be done for ICI management. Recycle BC's proposal is for separate management because high contamination levels in streetscape create unmarketable material that must not impact Recycle BC's current residential recycling program and its ability to market clean recyclables. We do not have the capacity to ease access to markets. Markets operate independently of our program; competition is intense, and our focus is ensuring we can successfully market the majority of the +200K tonnes that make up our core program.
  4. End Fate
    - Feedback: Two local governments questioned the detail required for end fate reporting.
    - Recycle BC consideration: As part of program compliance, it is important for Recycle BC to have transparency in reporting on the end fate for the material collected (e.g., managed by recycling, recovered as engineered fuel, used for energy from waste\**streetscape only* or, if not recyclable or recoverable, disposed via landfill). For end fate, the processor will provide the local government with what they did with the collected material. It is very likely that it will be merged with their other material for marketing, but they can provide the destination by material type, for example they sent their fibre to xx and their plastic to yy. We will provide more detail on stats needed when we know if the proposal is accepted and we plan for implementation.

In addition to these four main themes, one local government provided six other points of feedback. They wished this report to note "programs with this scale of behavior change will take time and can be reasonably expected to improve over time." Please see response #4 in Appendix B for details.

Recycle BC reviewed the feedback against the proposed streetscape program design and financial incentive. Four local governments provided feedback to the proposed model – two appeared to accept the proposal if some changes can be made and two would like to see a Statement of Work without commenting on acceptance.

## Appendix A – Consultation Webinar Q&A

Recycle BC held its consultation webinar on Streetscape Program Design and Financial Incentive, July 22, 2020. A total of 19 questions were asked during the webinar. They are documented below and the Q&A is also posted to Recycle BC’s website (see footnote page 4 for link):

#	Sector	Question	Answer
1	Local Government	Will GHG's from collecting streetscape recycling be reported to and claimed by Recycle BC?	Yes, GHG emissions will be part of the reporting process. The streetscape paper and packaging GHG emissions will be calculated and reported separately from our core program to Recycle BC.
2	Local Government	Could you please clarify if Recycle BC will contract a post-collection facility and the fees for the PPP material collected in streetscape collection?	The incentive offer and the model is for all streetscape PPP services by the local government. Recycle BC is not proposing to operate any portion of streetscape. The incentives are inclusive of collection, post-collection, P&E and customer service support as an all-in payment rate.
3	Local Government	Can you clarify what you mean by payment for all end fates (including landfill)? Does that mean garbage collection?	No, it means that if collection from the recycling portion of the station is deemed unrecoverable and goes to landfill, all of the collected tonnage from the recycling receptacles, even if it went to landfill, will be paid for. We are not paying for managing the garbage collection receptacles in a station – garbage collection remains a local government responsibility.
4	Local Government	Would municipalities be responsible for conducting their own audits on annual basis? If so, is there guidelines for this?	Yes, it is part of the proposal that the municipality would be responsible for their own audits at least once/year. There would be a format - by sample size, materials and weights - for a common methodology and to compare/compile audit results.
5	Local Government	When are you looking to begin the 2 year term? When will the cut off for applications be?	This is the first step, to do the consultation and see if our proposal is accepted as a path forward. If accepted we need to provide an amendment to our program plan and have that approved before we look to implementation activities. We do not have a start time at this point as this is as stage in the journey.
6	Local Government	The 2 weeks feedback period is really challenging during summer vacations. can you please consider extending that to 4	If there is an individual municipality that has difficulty meeting the two week turn around please notify us at <a href="mailto:consultation@recyclebc.ca">consultation@recyclebc.ca</a> and your preferred date. We are hopeful with such a small group and with the work to date in the round table sessions that this feedback period will be sufficient.

<b>7</b>	Local Government	When is the incentive expected to start? 2021? So first audit would be required in 2021?	As mentioned we do not have a start date today. There will be an audit of the material in its first year as part of the service standards.
<b>8</b>	Local Government	Are LGs only responsible to collect and transport the material to the recycling facilities?	No, this is an inclusive program of all activities. The local government will be responsible to provide collection, post-collection, P&E and customer service support to receive the all-in payment rate.
<b>9</b>	Local Government	What are you expecting in terms of end fate reporting?	We are looking at something that isn't onerous but we do need to know what happens to collection tonnage by material. For example, how were fibres and containers marketed? We will have specific reporting questions. We expect that municipalities won't be able to keep streetscape material segregated after receipt at a transfer station or other receiving location and will take that into consideration.
<b>10</b>	Local Government	How do we measure the recycling that is sent to landfill? separate it in the truck? leave it in the recycling stream?	If you collect streetscape recycling receptacles along with garbage receptacles in the same truck, it would be a split-bodied truck. If the truck went to landfill for both collected streetscape recycling and garbage, then there will be the need to split weigh the truck to have weights for each compartment and report the actual PPP tonnes to Recycle BC.
<b>11</b>	Local Government	Considering the very dynamic recycling markets, would Recycle BC accommodate or ease access into your better established and more stable/local recycling and engineered fuel market?	The difficulty is that streetscape collected material is so tremendously unlike our core business and the marketing of our residential curbside, multi-family and depot material is critical. Markets that accept our commodities are precious to us and have exceeding high standards -- we cannot have streetscape material commingled or have markets believe in any way that this is connected to our core material. We need to protect our ability to market >200,000 tonnes of our core program and competition for markets is intense.
<b>12</b>	Local Government	Can you clarify the payment process for PPP in the organics stream? Is the audited share of PPP used along with scale weights?	We do not have clarification today for PPP in the organics stream. We have not determined the organics element yet as the OMRR revisions have not been implemented to add paper as an acceptable material for organic collection. When we do look at organics it may depend on if your organic bin is a substitute for the paper bin or in addition to.
<b>13</b>	Local Government	Which scale weights will be used, those at the recycling facilities (end fate) or scales at transfer stations?	It would be at the inbound point - the first weigh scale opportunity when the streetscape PPP material is still segregated before it gets commingled with any other material.



14	Local Government	Will a best practices guide for PPP streetscape collection be produced? Or will this be covered in the Requirements/Suggestions of the report?	We are considering the services agreement to be the tool for the standards. We can look at doing an additional guide but because we are proposing 2 years of discovery to obtain actual information, it may be a bit premature for a best practices guide.
15	Local Government	Where can I find information on if our municipality is eligible to participate and details of how the program works. We have three stream bins but with contamination levels so high we have simply placed in the garbage for disposal. Would this be considered single stream? Where would we bring the collected material? Do you have an estimated weight be street collection container?	By being invited today, one of the 31 local governments in the Round Table series, you are eligible to participate in this model as outlined in this consultation. Regarding your choice of collection stream(s), we will work with you on what your program could be. As mentioned, this is an inclusive program for all services by the local government so you would bring your collected material to your processor or if unrecoverable to a landfill. Reporting needs to be actual weight and not estimated weight to participate in the program. Due to the low data points and high variability of container types, I do not have a meaningful estimated weight to provide.
16	Local Government	Can you speak to the province's role from here on (i.e. do they have a role in approving this proposal/offer)?	Should today's proposed model and financial incentive offer be accepted by the eligible local governments, Recycle BC will provide to the MOECCS a proposed amendment to our program plan for Ministry approval.
17	Local Government	Considering the higher level of contamination, is there any support from Recycle BC marketing the materials?	The difficulty is that streetscape collected material is so tremendously unlike our core business and the marketing of our residential curbside, multi-family and depot material is critical. Markets that accept our commodities are precious to us and have exceeding high standards - we need to protect our ability to market our core program and competition for markets is intense. Having said that, if we can provide marketing suggestions for contaminated material we will do so if we come across options in our work.
18	Local Government	Is there any incentive for post collection sorting activities?	The proposed payment rates of \$1,000/Te single stream and \$4,000/Te multi-stream is inclusive of the information received from the surveys on total program cost so there is not an additional incentive for sorting activities.
19	Local Government	Is there any commitment to a fin offer after 2 years, even if different?	We are proposing 2 years of discovery to obtain actual information to determine if a net-positive environmental outcome is possible, and if yes under what model, before we make any further commitments.

Following the webinar, additional questions were asked via the [consultation@recyclebc.ca](mailto:consultation@recyclebc.ca) email. They were quite specific to the local government and are provided below with the answers as given via return email to sender (edited to remove identifier):

#	Sector	Question	Answer
1	Local Government	<p>&lt;x&gt; was invited to participate in the Streetscape Round Table discussion so I presume we are eligible to participate in the streetscape program with related subsidy. Is this correct?</p> <p>Do you have a draft copy of the agreement we would be required to sign for review?</p> <p>Do you have an estimated average weight per street bin based on the pilot projects? I recognize there will be variability on this based on location and type of bin but it enable us to complete a rough estimate using the number of bins on City streets.</p> <p>The street bins we have are supplied by &lt;x&gt; and are three stream however, due to high contamination, we have been collecting it as single stream and disposing of it through the waste disposal. If &lt;x&gt; participated in this program would we have to separate the garbage component out?</p>	<p>Yes, you are eligible to participate.</p> <p>No, we are at the step of determining if our proposal is accepted or not.</p> <p>The variability was so extreme that we do not have an average rate. The closest measure that may be of help is a weighted average tonne of 0.32% of curbside tonnage.</p> <p>You would need to weigh the content of the recycling receptacles separately from your garbage receptacles but if the material collected was too contaminated and unrecoverable it can go to landfill as its end fate.</p>
2	Local Government	<p>Is the intent that the financial incentive rate will be applied to all the material collected through the recycling stream(s)?</p> <p>The vast majority of paper products are for food packaging. As a result, we have made the decision that the most responsible end fate of paper products in our streetscape is to</p>	<p>Yes</p> <p>We haven't yet determined how to address an organics stream yet as the OMRR revisions have not been implemented to add paper as an acceptable material for organic collection. When we do look at organics</p>

		<p>compost that material. This will also help to prevent contamination in our container stream. Can you explain if the financial incentive will apply to paper that is composted in the organics bins alongside food waste?</p> <p>Can you provide a rough scope for the audit requirements? The waste composition we completed in 2019 was a substantial cost to &lt;x&gt; and this ongoing expensive could consume a substantial portion of the financial incentive.</p> <p>If we do proceed with designing our program so that paper goes into the organics stream (regardless of OMRR changes) would that be considered multi-stream given our recycling stream is design as just containers. Note that “unsoiled” paper (newsprint, boxboard, OCC, office, magazines, bound paper, etc.) is 8% of all material collected in our streetscape.</p>	<p>it may depend on if your organic bin is a substitute for the paper bin or in addition to.</p> <p>This first step is to determine if our proposal is accepted. We haven’t undertaken other elements in detail until we know if this program is going ahead or not. The audit will have a format - by sample size, materials and weights - for a common methodology and to compare/compile audit results. The size of your sample will in part be determined by how many stations/receptacles you have for collection. It will be one time per year for a snap-shot of contamination.</p> <p>I don’t have any answers on organics at this time. Right now the model for multi-stream is one receptacle for fibre and one receptacle for containers with both streams being assessed for recyclability upon collection.</p>
3	Local Government	<p>Auditing requirements: In the proposal presentation two audits were mentioned – a One-time Audit and Annual Audits. Can you share what details will be required and the scale or sample size of each audit (a standard was mentioned). Assuming municipalities will be required to complete both types of Audits, will it be mandatory to hire a 3rd party consultant to provide this information or can it be completed internally?</p> <p>Clarification on the role of paper and how it affects the incentive: The SSR incentive</p>	<p>The audit would be annually once per year.</p> <p>The first step is to determine if our proposal is accepted. We haven’t undertaken other elements in detail until we know if this program is going ahead or not. The audit will have a format - by sample size, materials and weights - for a common methodology and to compare/compile audit results. The size of your sample will in part be determined by how many stations/receptacles you have for collection. It will be one time per year for a snap-shot of contamination. There is only one type of audit and it would not be mandatory to hire an external firm.</p>

		<p>proposed is \$1,000 or ¼ of multi-stream units. In the Roundtable meetings there were discussion about combining paper and organics as a “fibre” stream. What incentive would be available for this configuration?</p> <p>Do you have a standard volume to weight conversion metric for SSR (or containers and paper) that you used in analyzing Streetscape data from local governments?</p>	<p>We haven’t yet determined how to address an organics stream yet as the OMRR revisions have not been implemented to add paper as an acceptable material for organic collection. When we do look at organics it may depend on if your organic bin is a substitute for the paper bin or in addition to. Right now the model for multi-stream is one receptacle for fibre and one receptacle for containers with both streams being assessed for recyclability upon collection.</p> <p>Sorry, we don’t have a conversion metric for volume because, even for single-stream, the container size and collection frequency had large variations with very few reported tonnages. We simply didn’t have a data set that allowed for conversion.</p>
4	Local Government	<p>Could we use multi-stream containers and co-mingle the material in the truck to obtain the multi-stream incentive? I am not sure if there would be any benefit of delivering two streams to our processor as I understand they only bale co-mingled material...</p> <p>How do we measure the material that is in recycling containers but too contaminated and sent to landfill when we are co-collecting garbage and recycling? Would this mean we would have to deliver the contaminated recycling in a separate load to the landfill? (If we are collecting multi-stream I would assume we would want to use the other side of the truck for the other material - it doesn't make too much sense to collect one stream at a time when we could be collecting two streams). If we deliver contaminated recycling in a separate load, would we have to provide landfill scale tickets for validation?</p> <p>For end fate, how can we determine where the material goes? What if it gets</p>	<p>The proposal for multi-stream collection is that the material remains separated for better sorting, marketing and end fate. If you deliver single stream material to your processor we would consider this single stream collection.</p> <p>The material in the recycling receptacles would be kept separate from the garbage collection until the point of weighing. If both are destined for landfill due to contamination based on observation by your collection personnel, one option is a split truck to obtain the weight of the recycling collection portion.</p> <p>For end fate, your processor will provide you with what they did with the collected material. It is very likely that it will be merged with their other</p>

	<p>consolidated with other material? What does end fate reporting look like?</p> <p>What is the reporting frequency for tonnages?</p>	<p>material for marketing, but they can provide the destination by material type, for example they sent their fibre to xx and their plastic to yy.</p> <p>Reporting will be through Recycle BC's portal so the frequency of logging this information will be up to the collector. We will establish a minimum timeframe such as quarterly.</p>
--	---	--

## Appendix B – Written Feedback Submissions

Recycle BC held its consultation webinar on Streetscape Program Design and Financial Incentive, July 22, 2020. Written feedback was received from four participants. The feedback is provided below (edited to remove identifier):

#	Sector	Feedback	Response
1	Local Government	<p>&lt;x&gt; staff were active participants in the Streetscape Recycling Roundtable Series in 2019 and the outcomes of that dialogue have directly informed changes to &lt;x&gt; streetscape recycling program.</p> <p>In 2020 and 2021 &lt;x&gt; will invest approximately \$225,000 in capital towards new infrastructure to enhance streetscape recycling. This investment represents a threefold increase to the number of recycling stations across &lt;x&gt;, including the expansion from downtown locations to highly frequented urban villages and parks. Operational changes and costs are also being incurred to support the collection and diversion of recyclable material.</p> <p>The changes to &lt;x&gt; streetscape program can accommodate all the mandated requirements and all the suggested requirements contemplated in Recycle BC's program design with the exception of the suggestion of separate receptacles for paper.</p> <p>Results from two waste composition studies of streetscape material completed in 2019 indicate that recyclable paper comprises 6.5% of all streetscape material collected in &lt;x&gt;. In contrast, soiled paper comprises 16% of all material. These local conditions present a substantial risk of paper contamination, which has led to the &lt;x&gt; program design of including soiled and unsoiled paper in the green organics receptacle for endfate composting. The &lt;x&gt; streetscape recycling program shares common objectives with Recycle BC, including maintaining the integrity of the</p>	Thank you for providing your feedback.

		<p>recycling system and mitigating greenhouse gas emissions. Given these objectives, &lt;x&gt; has made a deliberate program design decision to introduce a multi-stream collection system that incorporates paper fibre into the organics stream.</p> <p>In response to Recycle BC's proposed program design and financial incentive for streetscape recycling, &lt;x&gt; staff request that Recycle BC:</p> <ol style="list-style-type: none"> <li>1. Confirm that &lt;x&gt; streetscape recycling program is categorized as a multi-stream collection type to reflect the higher costs and improved performance of operating this service.</li> <li>2. Provide additional program details for the compensation of soiled paper products and packaging collected in the organics stream.</li> </ol>	<p>The model for multi-stream is one receptacle for fibre and one receptacle for containers with both streams being assessed for recyclability upon collection.</p> <p>We haven't yet determined how to address an organics stream as the OMRR revisions have not been implemented to add paper as an acceptable material for organic collection. When we do look at organics it may depend on if your organic bin is a substitute for the paper bin or in addition to.</p>
2	Local Government	<p>Recycle BC Streetscape Financial Incentive Feedback:</p> <ul style="list-style-type: none"> <li>• Not an official Scope of Work, so we would require further detail as to how this would look administratively and operationally.</li> <li>• We would've expected Recycle BC provide access to the same end processors as the use for residential recycling. As there are a limited number of processors, would we not end up relying up the same contractors?</li> <li>• As a smaller municipality, it may cost us more to conduct than we would receive through the financial incentive offer due to low tonnages and high contamination rates.</li> <li>• We've considered replacing and/or adding some streetscape paper receptacles with organics so all paper products would be destined for the organics stream. How does this effect eligibility if the stations stray from the suggested paper and mixed containers? This consideration is due to the high contamination rate seen in the paper stream.</li> </ul>	<p>Thank you for providing your feedback.</p> <p>It may be the same processor under a separate contract with the local government as, for example, would be done for ICI management.</p> <p>We haven't yet determined how to address an organics stream as the OMRR revisions have not been implemented to add paper as an acceptable material for organic collection. When we do look at organics it may depend on if your organic bin is a substitute for the paper bin or in addition to.</p>

		<ul style="list-style-type: none"> <li>• If a station included just two units: landfill garbage and mixed containers (i.e. no paper or organics but NOT single stream) how does this affect eligibility? Space for street furniture is limited in some areas and having only mixed containers to capture some recyclable material is a consideration.</li> <li>• For the annual audits, what would the sample size need to be? And what are the expectations for submitting findings/data/etc.? To do a waste audit annually is a notable expense.</li> </ul>	<p>The model for multi-stream is one receptacle for fibre and one receptacle for containers with both streams being assessed for recyclability upon collection.</p> <p>The audit will have a format - by sample size, materials and weights - for a common methodology and to compare/compile audit results. The size of your sample will in part be determined by how many stations/receptacles you have for collection. It will be one time per year for a snapshot of contamination.</p>
3	Local Government	<p>Please find the comments and questions from &lt;x&gt;.</p> <ul style="list-style-type: none"> <li>- We would need more details on the SOW to see if it does make sense operationally, administratively</li> <li>- We would need more details on how the audit system would be set up and what the expectations would be (Imagine this would be outlined in the SOW)</li> <li>- Can we get more information on why Recycle BC would not provide the same access to the end processors</li> <li>- End of fate reporting – does this mean just giving processor information or actual stats .</li> <li>- Post collection – they will not offer direct access to their processors.</li> </ul>	<p>Thank you for providing your feedback.</p> <p>The audit will have a format - by sample size, materials and weights - for a common methodology and to compare/compile audit results. The size of your sample will in part be determined by how many stations/receptacles you have for collection. It will be one time per year for a snapshot of contamination.</p> <p>It may be the same processor under a separate contract with the local government as, for example, would be done for ICI management, but not organized or contracted by Recycle BC as the streetscape proposal is inclusive management by the local government.</p> <p>For end fate, your processor will provide you with what they did with the collected material. It is very likely that it will be merged with their other material for marketing, but they can provide the destination by material type, for example they sent their fibre to xx and their plastic to yy. We will provide more detail on stats needed when we know if proposal is accepted and we plan for implementation.</p>
4	Local Government	<p>1. From our perspective, <u>Proof of Concept has already been achieved</u>. Municipalities that have followed</p>	<p>Thank you for your feedback.</p>



		<p>best practices (simple icons, colors, limited openings, etc.), such as Vancouver and West Vancouver, are already running successful streetscape recycling programs with consistently recoverable material. It has been clearly established that streetscape recycling can be done in a viable manner, and with recoverable material.</p> <p>2. Generally, we feel the July 22, 2020 presentation presented a somewhat pessimistic view on the viability of streetscape recycling. While we agree that streetscape recycling is more challenging in public spaces compared to long-standing residential programs, there is wide variability of results within municipalities that submitted information on their existing programs and participated in the consultation. We feel it is important to highlight in the final report that <u>programs with this scale of behavior change will take time and can be reasonably expected to improve over time</u>, assuming best practices are consistently followed, similar to the original blue box program.</p> <p>3. We recognize that there is limited financial data as to what a successful streetscape recycling program costs to operate, and believe the proposed financial incentive offer (\$4000/tonne) to cover operating costs for the 2 year period to be fair. We would strongly prefer a <u>long term commitment to on-going funding with the 2 year evaluation period focused on elements of the Services Agreement, including a review of the financial incentive amount</u>. Local governments are under pressure to continue to expand on-street recycling programs, and it is near impossible to do that with looming uncertainty of potentially no funding after 2 years.</p>	<p>The webinar presentation explained Recycle BC's view (slides 21,22) on the effectiveness of streetscape collection for recovering recyclable material.</p> <p>Your comment has been included in this report.</p> <p>We are proposing 2 years of discovery to obtain actual information to determine if a net-positive environmental outcome is possible, and if yes under what model, before we make any further commitments.</p>
--	--	---	--

	<ol style="list-style-type: none"> <li>4. We believe that <u>capital costs should also be included</u> in the financial incentive of the final program offer.</li> <li>5. Public Education and Promotion is included as a mandated element but it is unclear what is expected. Local governments are subject to an annual budget review process and funds may be limited or not available for education and promotion. <u>Any mandated public education and promotion should be the responsibility of Recycle BC.</u> It also makes more sense for Recycle BC to take this on for consistency and greater economies of scale.</li> <li>6. Recycle BC is requiring reporting of end fate for the material collected, by material type. The current contract with our processor does not require this information, as such we (and others) may not be in an easy position to provide the level of detail Recycle BC is hoping for. Although we agree that this is important and every effort should be made, <u>municipalities should not be penalized for inability to acquire accurate information on end fate.</u></li> <li>7. Recycle BC is requiring reporting of composition and contamination on a minimum annual basis. It is not clear what level of rigor/detail would be required as it could range from a relatively inexpensive in-house visual estimate to a costly third party study. Local governments are subject to an annual budget review process and funds may be limited or not available for detailed waste composition studies. <u>Our preference is that Recycle BC cover any requirement for third party auditing costs.</u></li> <li>8. Recycle BC is requiring reporting of Greenhouse gas emissions reporting on a minimum annual</li> </ol>	<p>Recycle BC is not offering to provide on-street furniture for the collection of streetscape recycling.</p> <p>Slide 14 in webinar spoke to municipal preference for elements that embed best practices for optimizing capture and reducing contamination. Slide 30 included design element of promotion and education to improve capture and accuracy rates. Typically for streetscape this P&amp;E occurs at the stations.</p> <p>The proposed program design is for inclusive service (see slide 27).</p> <p>As part of program compliance, it is important for Recycle BC to have transparency in reporting on the end fate for the material collected (e.g., managed by recycling, recovered as engineered fuel, used for energy from waste*streetscape only, or if not recyclable or recoverable, disposed via landfill). This is a requirement within Recycle BC's proposal for streetscape service, not a penalty item for non-compliance.</p> <p>The audit will have a format - by sample size, materials and weights - for a common methodology and to compare/compile audit results. The size of your sample will in part be determined by how many stations/receptacles you have for collection. It will be one time per year for a snapshot of contamination. The proposed program design is for inclusive service with fee rate including the audit.</p>
--	---	--

		<p>basis. This will be a new task for most if not all the participating municipalities. <u>Recycle BC should take steps to support municipalities with this reporting requirement</u>, including outlining the methodology and/or providing tools to calculate based on preferred methodology.</p>	<p>GHG emissions are reported to Recycle BC by all collectors already (Recycle BC reports direct service collection). The streetscape paper and packaging GHG emissions will be calculated and reported separately and Recycle BC will provide instructions and support.</p>
--	--	--	--