



Reference: 415877

September 17, 2025

MMBC Recycling Inc. doing business as Recycle BC
405-221 West Esplanade
North Vancouver, BC
V7M 3J3

Dear Sam Baker:

Thank you for submitting the Recycle BC *Packaging and Paper Product (PPP) Extended Producer Responsibility Plan* (the “plan”) initially on April 14, 2023, in fulfillment of the requirements of Part 2, Section 6 of the [Recycling Regulation](#) (the “regulation”) made under the [Environmental Management Act](#). Recycle BC re-submitted an updated plan for approval on February 19, 2025. The most recent revision of the plan submitted by Recycle BC on August 19, 2025, is attached to this letter.

I acknowledge the efforts of MMBC Recycling Inc. (doing business as Recycle BC, and hereafter referred to as Recycle BC) and the ongoing dialogue between Recycle BC and the Extended Producer Responsibility (EPR) section staff to develop revisions and improvements to the plan to better meet the requirements of the regulation.

Under the regulation, the director, otherwise known as the Statutory Decision Maker (SDM), has the ability to approve an extended producer responsibility plan submitted under section 4. I have completed my review of the submitted plan and Recycle BC’s revisions of the plan in response to the proposed amendments as outlined in my preliminary decision letter of May 23, 2025.

Prior to the issuance of this decision letter, Recycle BC was provided with feedback on the proposed plan amendments and has had the opportunity to propose further amendments or provide additional information for consideration. I have considered the further amendments and accompanying rationale proposed by Recycle BC, and I am satisfied that they have addressed the deficiencies identified in the plan, as outlined in the preliminary decision letter. Please be advised that, pursuant to section 5(5) of the regulation, I hereby approve the plan submitted on August 19, 2025 and enclosed with this letter.

Ministry Expectations

The ministry expects continuous improvement across all future plans and amendments submitted by Recycle BC. The following expectations are provided for Recycle BC's consideration for future amendments to the plan:

A. Curbside and Multi-Family Collection Baseline

Please note an expectation in the next plan iteration to update the Curbside and Multi-Family baselines. It is expected that each plan iteration provide a new baseline for these services to drive continuous improvement.

B. First Nations Collection

I acknowledge the work Recycle BC is putting into the First Nations Onboarding document as a means to transparently communicate Recycle BC's actions to provide service to First Nations communities. This onboarding document is intended to integrate feedback and advice from First Nations people into an onboarding schedule. I expect this to provide a significant increase to service in First Nations communities. I further expect the next iteration of the plan to build off of that increase to service.

Furthermore, for the next plan iteration, I expect there to be thorough efforts made towards First Nations engagement on the draft plan, in order to gather feedback and perspectives from First Nations communities and Indigenous organizations involved in waste management and recycling (e.g., multiple consultation options to accommodate differing availability).

C. Paying the Cost

Please note that the ministry has updated guidance documents for producers paying the cost ([Paying the Costs under Recycling Regulation Section 5\(1\)\(c\)\(i\) and Dispute Resolution Guidance 2024](#)). For future plan reviews, it is expected that Recycle BC follows the updated guidance to ensure the compensation rate methodology is presented as the steps taken and methods used, which will allow interested parties to determine implications to their interests (e.g., step-by-step process for negotiating costs, what happens at each step of the process, what variables are included in the compensation rate methodology, etc.).

D. Multi-Family Service

With the growing number of multi-family units across the province, inconsistent collections provided by private waste haulers work to reduce resident participation and increase mistrust in the recycling system. Though I acknowledge the difficult nature of servicing multi-family units, the next plan iteration should focus on an approach to increase consistent service to multi-family units across the province.

E. Post-collection

EPR agencies are responsible for the end-of-life (EOL) management of containers used for the collection and transportation of program materials, for example, when a blue box is damaged and at EOL. The Recycle BC program includes the use of hundreds of thousands of plastic curbside blue boxes, collection bags/super sacks, and pallets. In Section 4.4 of the plan Recycle BC has committed to developing and communicating a formal EOL management system for blue boxes. The next iteration of the plan should also have information on, and reporting commitments for, the EOL management system for all program collection and transportation of materials (e.g., super sacks, pallets, etc.).

F. Communications

Awareness and education are crucial aspects supporting the success of the program. As can be seen in annual reporting, some regional districts' per capita collections are not equal to the collections of other regions with a similar population size. The next proposed plan should include regional per capita collections thresholds that triggers the need for education and awareness campaigns in regions performing well below the provincial per capita average.

G. Pollution Prevention Hierarchy

Recycle BC program is a mature EPR program and has offered consistently high recycling Rates at EOL. As such, the next proposed plan should target initiatives to manage program materials at higher levels of the PPH (e.g., consumer reuse initiatives), including targets to manage higher up the PPH.

H. Annual Targets

For future plan iterations, it is expected that Recycle BC include targets for each year for all performance targets and metrics in the plan. This allows for increased oversight of the program's progress each year, and greater transparency for interested parties to collect information or chart data. If a proposed plan reporting year has passed, the appropriate target is always the previous target from the approved plan.

For clarity, the 2024 baseline year utilized in this plan will need to be revised to align with a more appropriate year for the subsequent planning cycle (i.e., 2027).

I. Appendix B Collection Accessibility and Eligibility Criteria

The next plan iteration should work to combine Appendix B into a comprehensive list detailing which services (i.e., curbside, depot, events, etc.) are available to which community types and the baseline service each type can expect. As detailed now, the Appendix first describes criteria for curbside services, with a minimum population of 5,000 residents, then goes on to describe community criteria for communities greater than 1,000, 2,000, 10,000, and 35,000. Due to the way this is presented, it is difficult for the reader to determine which services each community type is eligible for. It would be more transparent if the information in the Appendix was more comprehensively combined for reader clarity.

Reporting Expectations

Please be advised, under Part 2, Section 8(2)(h) of the regulation, the director can specify any other information required in the annual report. To ensure the continuity of all performance measures, performance requirements, and targets in the plan, reporting on each of these metrics will be maintained until they are superseded by an approved plan renewal.

The ministry expects this approval letter to be forwarded to Recycle BC's board of directors as well as its member producers, since each producer is responsible for ensuring its agent fulfills the plan, and compliance proceedings may be taken against a producer if the agent fails to implement the plan.

Third Party Assurance for Non-Financial Information in Annual Reports

Third party assurance for non-financial information in Annual Reports is required through Section 8(2)(h) of the regulation. The assurance report should be completed in accordance with the document entitled, "Third party assurance for non-financial information in annual reports" dated 2024 and revised from time to time, which is enclosed.

Next Plan Review Due Date

Section 6 of the regulation requires a plan review every five years. As per this requirement, Recycle BC must review its approved plan, consult on the plan, and submit proposed amendments to the director, or notify the director in writing that no amendments to the plan are necessary, by **April 15, 2028**. Guidance on this process can be found on the Extended Producer Responsibility webpage at: [Extended Producer Responsibility - Province of British Columbia \(gov.bc.ca\)](https://www.gov.bc.ca/epwr/).

Right to appeal

If you disagree with this decision, Division 2 of Part 8 of the *Environmental Management Act* provides for appeal of my decision to the Environmental Appeal Board (EAB). In accordance with the *Act* and with the Environmental Appeal Board Procedures regulation, the EAB must receive notice of the appeal no later than 30 days after the date you receive this decision. For further information, please contact the Environmental Appeal Board at (250) 387-3464.

Thank you for your efforts on this plan, and I appreciate Recycle BC's continued commitment to achieving compliance in this regard. If you have any questions regarding the implementation of the plan, please contact me at Andreas.Wins-Purdy@gov.bc.ca or through the Extended Producer Responsibility inbox at ExtendedProducerResponsibility@gov.bc.ca.

Sincerely,



Andreas Wins-Purdy, P.Ag.
Director, Extended Producer Responsibility, Program Delivery
Authorizations and Remediation Branch
Environmental Protection Division

cc:

Jordan Best, Senior Director, Program Development, Recycle BC: jbest@recyclebc.ca
Leeanne Fraser, Senior Policy Analyst, Extended Producer Responsibility, Program Delivery: Leeanne.Fraser@gov.bc.ca
Katrina Forrest, Senior Policy Analyst, Extended Producer Responsibility, Program Delivery: Katrina.Forrest@gov.bc.ca
Deb Epps, Executive Director, Authorizations and Remediation Branch: Deb.Epps@gov.bc.ca
Tess Rouse, Director, Extended Producer Responsibility, Environmental Policy and Initiatives Branch: Tess.Rouse@gov.bc.ca
Extended Producer Responsibility: ExtendedProducerResponsibility@gov.bc.ca

Enclosure:

- Recycle BC Packaging and Paper Product (PPP) Extended Producer Responsibility Plan, submitted August 19, 2025
- Third party assurance for non-financial information in annual reports, 2024