



RECYCLEBC™

2022 Consultation Report



Prepared by:



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1. Overview

Recycle BC is a not-for-profit organization responsible for residential packaging and paper product (PPP) recycling throughout British Columbia, servicing over 1.8 million households or over 99% of BC residents through curbside, multi-family and/or depot services. Every five years, Recycle BC is required to develop, consult on and submit a new *Packaging and Paper Product Extended Producer Responsibility Plan* (the program plan) to the BC Ministry of Environment and Climate Change Strategy for approval. The program plan outlines the objectives, commitments and performance targets for the next five-year period and act as a roadmap for Recycle BC's operations.

Recycle BC released a draft new program plan for consultation at the end of September 2022. This report outlines the 2022 consultation process completed on that draft new program plan and associated feedback, and is broken down by the following key elements.

Consultation Process	<ul style="list-style-type: none">• Consultation timeline• Consultation by the numbers
What we heard by topic	<ul style="list-style-type: none">• Key insights by program plan section
Collector Conference	<ul style="list-style-type: none">• Consultation approach and process• What we heard by session
Stakeholder Workshops	<ul style="list-style-type: none">• Workshop approach and process• What we heard by workshop
Written Feedback	<ul style="list-style-type: none">• Written feedback approach and process• What we heard by program plan section
Response from Recycle BC	<ul style="list-style-type: none">• Written responses by program plan section

2. Recycle BC Consultation Process

2.1 Timeline

	Date	Activity	Number of Attendees
Collector Conference	October 6 & 7	In-person conference	78
Advisory Committee	October 6	Hybrid meeting	5
Stewards	November 1	Workshop via zoom	51
Collectors	November 1	Workshop via zoom	39
BC Product Stewardship Council	November 3	Workshop via zoom	23
First Nations	November 15	Workshop via zoom	1
Environment and Public	November 16	Workshop via zoom	16
BCBRDA	November 17	Workshop via zoom	20
Stewards Association	November 22	Workshop via zoom	5
Deadline for written feedback	December 31	By email or mail to Recycle BC	52

2.2 By the Numbers



Collector conference. 6 sessions / 78 attendees / 2 days



Stakeholder workshops. 7 sessions / 155 stakeholders



Written feedback. 52 written responses

3. What We Heard

The following section highlights what we heard across all consultations (6 conference sessions, 7 online workshops and written feedback). This section outlines key insights that were heard throughout the consultation process, with detailed feedback for each of the consultation approaches available in Sections 4-6 of this report.

Section 2. Extended Producer Responsibility Agency

2.2 Administration of the Program Plan

Feedback from the written responses highlighted the interest for both the Advisory Committee and Board to include a wider range of stakeholders. Further, requests were made to increase transparency by sharing meeting minutes and recommendations from Advisory Committee meetings, reporting on how Board members are trained and reporting out on what organizations Recycle BC is a member of.

Stakeholders who attended the BC Bottle and Recycling Depot Association (BCBRDA) workshop commented they would like more opportunities to share their feedback, and have their voice heard – they suggested one way to do this, would be to have the opportunity to have a representative sit on the Recycle BC Advisory Committee.

2.3 Producer Members and Definitions

Stakeholders who attended the Collector Conference had questions about how online markets are accounted for in the program plan and regulatory context.

Stakeholders who attended the Stewards workshop provided feedback on the proposed producer definition and encouraged Recycle BC to strive towards creating a definition that harmonized with the Canadian Council of Ministers of Environment (CCME) recommendation as well as the regulatory approach in other provinces like Ontario and Alberta.

Written responses suggested that Recycle BC work with the Ministry of Environment and Climate Change Strategy (MOECCS) to lower the exemption amount that permits producers of PPP below certain thresholds to not participate in the program, and that the MOECCS report the number of obligated producers who are not members of the program.

2.4 Program Financing

Written feedback provided by stakeholders suggested that leveraging the fee structure to move producers away from harder to manage / recycle materials like flexible plastics and foam, would be warranted, and that developing variable environmental handling fees based on criteria like lifespan, use of refillable/reusable containers and recyclable materials would drive design change.

Section 3. Packaging and Paper Product

3.2 Paper Product

Written feedback from stakeholders recommended that Recycle BC work with MOECCS to expand the scope of the Recycling Regulation to include books.

3.3 Single-Use Products and Packaging-Like Products

Written feedback from stakeholders highlighted a general support for inclusion of single-use products and packaging-like products in the program. Further, emphasis was placed on focusing on reducing single-use products and packaging-like products in the market.

3.4 Sources of Packaging and Paper Product

Written feedback indicated that Recycle BC should include packaging and paper product (PPP) from schools in the program. Further, stakeholders identified several ways to include industrial, commercial and institutional (ICI) materials in the program such as: exploring opportunities and conducting pilots to collect from ICI facilities that generate residential-like PPP, offering a service to manage ICI materials for a fee to collectors, and including all types of accommodations (e.g. hotels, long-term care facilities) in the program even if medical care and services are provided on-site.

Section 4. Program Design

4.3 Collection from Residents and Streetscape

4.3.3 Curbside Collection

Feedback provided in writing included support for the current direct service collection model by some, and a recommendation that local governments should retain the ability to provide operational direction, and maintain a connection with residents, by others.

Written feedback also indicated the notion that any community that wishes to implement curbside collection should be eligible, and that within one-year of expressing a desire to participate in the program, a community should be onboarded into the program. Further, clarification was requested on the eligibility under equivalency criteria for interior communities accessed by short, on-demand ferries.

Finally, written comments requested clarification on how the 90kg/HH threshold was determined and an expression that local governments should be able to transition more frequently into provision of service by Recycle BC.

4.3.4 Multi-Family Collection

Written feedback from stakeholders suggested that there is a desire to increase the amount of multi-family buildings that are serviced under the program. Stakeholders asked for Recycle BC to report on the percentage of buildings serviced by the community and / or Regional District, and that Recycle BC implement targeted campaigns aimed at building owners and stratas so that they are aware of the opportunity to participate in the program. Stakeholders also suggested that by increasing the incentive rates for multi-family collection, participation levels may also increase.

4.3.5 Integrated Recycle BC Collection Services

The new Community Eligibility Criteria outlined in Appendix C of the program plan was discussed in many of the stakeholder sessions (Advisory Committee, Collector Conference, Written Feedback and the following workshops: Collectors, BC Product Stewardship Council, and Environment and Public). Members of the Advisory Committee and those at the Collector Conference agreed that having specific criteria outlined is a useful tool.

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The most common question or concern raised across all groups was how those who are already in the program, but no longer meet the eligibility criteria, will be considered when their agreement terms end. Stakeholders requested additional clarity on what was driving the new criteria, and asked that Recycle BC consider the terminology of “meaningful contributions”. Several requests were made for Recycle BC to honour or maintain existing depots that no longer qualified in a “grandfathered” program. In the written feedback, stakeholders echoed these sentiments and also raised concerns about how the loss of remote depots would create additional pressures on centralized depots, that the new criteria might limit the ability for new depots in communities that warrant one, as well as concerns that the cost of operating depots independently if they were excluded from the program.

Several suggestions were put forward by stakeholders related to the eligibility criteria recommendations, including:

- Accessibility should include hours and operations for depots;
- Further considerations should be put in place for small, rural and island communities (i.e. the criteria outlined is too restrictive);
- Seasonality should be factored when considering total population, and / or population should not be a factor;
- Annual collection volumes should be considered;
- The inclusion of a grocery store requirement is currently acting as a barrier and should be removed;
- Recycle BC should include a firm commitment to continue partnership with all existing depots;
- A depot should be offered in any community with staffed garbage drop-off;
- Recycle BC should consider proximity to other recycling services and the benefits of “one stop shops”; and
- Additional information should be provided on the number of depots one community can have.

4.3.6 First Nations Collection

Stakeholders at the Collector Conference acknowledged and appreciated that First Nations are included in the new eligibility criteria. At the First Nations workshop, the discussion was focused primarily around capacity and partnerships. First Nation stakeholders highlighted the competing priorities and initiatives that they are spread between. The suggestion was raised that increased partnerships, particularly with local governments, including Regional Districts, could support their efforts through joint service agreements or a common depot. Responses from written feedback shared concern that the Integrated Recycle BC Collection Services eligibility criteria may exclude First Nations communities, and that all First Nations should be included without barriers, requirements or delays.

4.3.7 Streetscape Collection

Stakeholders identified that streetscape collection is extremely difficult to do well. Members of the Advisory Committee suggested that showcasing locations (e.g. City of Victoria, City of Vancouver) that are doing streetscape well, would be of merit. Further, the idea of working with Return-It to create joint messaging or promotions was raised. Finally, Advisory Committee members advised that unless a different

calculation was created for streetscape contamination, Recycle BC would not be setting itself up for success.

4.3.8 Financial Incentive Methodology

Five groups (stakeholders at the conference, collector workshop, BC Product Stewardship Council, BCBRDA, and written responses) had feedback on Section 4.3.8 of the program plan.

Across all consultations, stakeholders had similar feedback. Stakeholders suggested that the current incentive rates do not come close to covering all collection costs – with operating costs such as fuel, labour and equipment repair all on the rise, stakeholders are finding that the current timeline for incentive increases (every 5 years) is not reflective of the realities they face. Members of the BC Product Stewardship Council suggested that Recycle BC ask collectors what percentage of their costs are covered by incentives in order to showcase the divide between costs that occurred and incentives received. BCBRDA stakeholders were also in agreement that the current timelines for review are not sufficient and suggested that plans should be in place to change rates to reflect the current market. Finally, written responses indicated that stakeholders worry that collection costs are not fairly covered and collectors are subsidizing Recycle BC

Stakeholders suggested that they would feel more supported if there were considerations put in place for:

- Cost of equipment;
- Consideration of depot location (e.g. urban vs. rural);
- Contingency plans for natural disaster or emergencies (e.g. heat dome, or increased cost of fuel);
- Review of how audits trigger contamination levels and take depot / curbside performance into incentive structure (e.g. reward high quality material);
- Receiving facility model – make it more efficient and factor in distances that collectors will have to travel to reach receiving facility; and
- Pay the full cost of all collection services and prove compensation is covering all costs.

Additional suggestions were provided on how Recycle BC could better support financial incentives including:

- Promotion of ideas generated by collectors to improve recovery rates;
- Provide opportunities for grant applications and support the development of educational materials;
- Share information on contamination rates and costs on locations where Recycle BC runs programming;
- Think outside the box for remote communities, such as dry storage and annual pickup;
- Use artificial intelligence (AI) tools for contamination (e.g. Prairie Robotics / Rover);
- Consult with stakeholders on design of cost study; and
- Build the annual Consumer Price Index adjustment into incentive rate structure.

4.4 Post-Collection

Feedback from stakeholders at the conference and workshops consisted primarily of questions related to where materials are sent post-collection, and how Recycle BC plans for, and continues to address media that creates a lack of trust in the industry. Stakeholders who attended the environment and public

workshop suggested that more information be provided on the checks and balances that are conducted for end-markets.

Written feedback encouraged Recycle BC to include environmental outcomes as the key outcome to focus on post collection – these included suggestions to create reverse logistics systems for end-of-life depot supplies (super sacks) and that Recycle BC commit to including material at the highest level of the pollution prevention hierarchy.

4.6 Communications

Across all consultations, stakeholders expressed a need for communication materials that were transcribed into different languages in order to reach a wider range of residents in their communities. Collectors also asked that materials be ready-made and easily adapted (i.e. could take documents and simply add a logo). Specific promotional materials, such as those that focused on topics related to contamination reduction and resources for communities with single-stream collection were requested through written feedback.

Written responses also pointed to the notion that there could be a focus on increased collaboration with local governments to leverage opportunities that have the same goals, and that Recycle BC should work with producers to ensure accurate recycling labels appear on all their packaging.

Section 5. Program Performance

5.1 Managing Environmental Impacts

Stakeholders from the BC Product Stewardship Council workshop suggested that the current fee structure paid by producer members do not go far enough to support the Canada Plastic Pact's Golden Design Rules. Stakeholders from the Stewards Association workshop worried about the creation of an EPR program for single-use items soon to be banned at the Federal level and wanted clarification on incentives and penalties for adherence to the Golden Design Rules.

5.2 Pollution Prevention Hierarchy

All groups (stakeholders at the conference and the Collectors, Stewards, BC Product Stewardship Council, BCBRDA, Stewards Association, Environment and Public workshops, as well as written responses) had feedback on Section 5.2 of the program plan.

Stakeholders who attended the in-person conference provided innovative ideas to improve each step of the Pollution Prevention Hierarchy. To reduce environmental impacts, they were interested in opportunities for Recycle BC to support cleanup campaigns, eliminate unnecessary packaging types, push for reduction of PPP generated by producers (especially plastics) and include targets and reporting commitments for a decrease in PPP. In terms of redesign, participants expressed the need to explore more ways to discourage intense manufacturing while at the same time incentivizing the production of environmentally friendly products. For reuse, participants suggested that depots include a "reuse section" for Recycle BC products, with depots receiving proper compensation for the storage. Further, written feedback from stakeholders indicated that Recycle BC should fund reuse programs and education campaigns as well as utilize producer fee structures to encourage reuse and provide incentives to

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producers to offer refill and reuse systems. In the feedback for recycling, there was consensus on the need for a system to manage Recycle BC collection containers (e.g. broken blue bins).

Feedback from the online workshops focused on reuse and design. Participants expressed interest in an increase of emphasis on circularity and leading a “reuse box” pilot.

5.3 Performance Targets

5.3.1 Program Recovery Rate

Across all groups that responded to the performance targets during the consultation sessions (Collectors at conference and workshop, BC Product Stewardship Council, written responses), the general sentiment that the removal of contamination from the recovery rate calculation made sense. This should be supported with sufficient education and explanation so as to not confuse people. Further, stakeholders were asked if they agreed with the use of the offset recovery rate for program recovery. Stakeholders agreed, but did comment that when considering program recovery targets, and material category targets the two should use the same approach (i.e. either offset or aligned) as having two methodologies was confusing.

5.3.2 Material Category Performance Targets

Across all groups that responded to the performance targets during the consultation, there was agreement that the targets for flexible plastics were too low – written feedback suggested that Recycle BC should increase targets for plastics, especially flexible plastics. When considering the use of offset vs. aligned, stakeholders felt that aligned was more reflective of current performance. Through discussion, the idea of having the aligned recovery rate used for reporting but the offset recovery rate available for those that were interested was brought forth. Finally, stakeholders suggested that including explanations in the annual report on why targets are met, or not would be useful – particularly if any are above 100%.

4. Collector Conference

4.1 Approach and Process

The Recycle BC Collector Conference was held at the Anvil Centre in New Westminster on October 6 and 7, 2022. The conference was hosted by Recycle BC, and Pinna Sustainability led the consultation process over the course of six sessions. Each session was held in-person, and co-facilitated by team members of Recycle BC and Pinna Sustainability. The sessions ran in length from 50 minutes to 80 minutes. The sessions were:

- Advisory Committee Meeting;
- Overview of the Program Plan and Consultation Process;
- Accessibility and Design;
- Incentive Development;
- Performance Targets; and
- Pollution Prevention Hierarchy.

Section 4.2 of this report highlights the key questions, comments and recommendations as heard throughout the conference sessions. At each session, note takers were in the room, and in some sessions, participants were asked to provide feedback on paper either through comment sharing or in answering specific questions on a worksheet. Written documentation was collected, summarized and reviewed in order to be populated for this report. The documentation below provides an overview of what was heard - some details may have been edited slightly to ensure brevity and reduce repetition.

4.2 Key Questions, Comments and Recommendations by Session

4.2.1 Advisory Committee Meeting

Topic	Question/Comment
General	<ul style="list-style-type: none"> Will there be an inventory of the new materials? For instance, pictures and marketing materials – we want to make sure people understand what these new materials are. Anticipate the bottleneck will be on processing, not the collection.
ICS Criteria	<ul style="list-style-type: none"> Anticipate that although we feel like Port Moody and Coquitlam are nearby – residents of Port Moody will still think that it is a long way to travel to Coquitlam. Appreciate that the process has been formalized. Small communities may want to consider how to use the centralized organics system to be able to access your program – offer to help with this process, and think about how this could be accomplished. Believes this process will narrow down the complaints, by having everything so well laid out. With the new criteria, some communities would no longer qualify – do you see a positive net gain? We don't want to see an unintended consequence of the decrease in access by implementing these new criteria.
Streetscape Collection	<ul style="list-style-type: none"> Are there examples of places that are doing it well? City of Victoria or the City of Vancouver? Including food and drinks as contamination is basically setting ourselves up for failure – calculation should be different for streetscape collection. The behavioral change required of consumers is a mountain too high to climb – is there an opportunity to work with Return-It's coffee cup pilot? Do joint messaging/promotion with Return-It? There needs to be a consistent look and feel to streetscape collection (across malls, universities etc.) and then private and public can join as well.
Financial Incentive Methodology	<ul style="list-style-type: none"> Note from Recycle BC that the advisory committee will be involved in the cost study process.
Pollution Prevention Hierarchy	<ul style="list-style-type: none"> Is there a date set for the rollout of the combination of the two categories – Plastic Bags and Overwrap / Other Flexible Plastic Packaging?
Performance Targets	<ul style="list-style-type: none"> Netting out PPP is a great approach but may be confusing for people, e.g. people might say we need to be more ambitious even though we are (actually 85% vs. 80%). It will be confusing for people why one is aligned and one is offset. Approach makes sense – one looks at overall performance and one is specific – people who want to know specifics are going to want to know real time. Does the target for flexible plastic change due to the announcement? Why is there a lower target on flexible packaging? Curiosity only. Lots of optimism reading this document.

4.2.2 Plenary Session

The plenary session at the collector conference was hosted by Recycle BC on October 6, 2022. This session was facilitated by Pinna Sustainability. The session included a presentation by Recycle BC, and followed with a question answer period. The following questions / comments were asked by topic area.

Topic	Question / Comment	Answer / Request
Program Administration	Where can we find information on contracts and agreements?	Refer to Incentive Development session.
	Where can we go to talk about specifics of our contracts?	Please reach out to Recycle BC directly.
	The window of opportunity to join the Recycle BC program (5 years) is potentially too long.	Refer to Section 7 below.
Producer Members and Definition	Is Amazon part of the program? How do you calculate for online shopping?	We have a high compliance rate in BC, however some producers do not pay-in to the program. The Ministry is responsible for enforcing the Recycling Regulation.
Communications	What is timeline to get communication about new plastics?	Recycle BC will be providing to collectors within the next two months.
	Will there be communication materials for single stream?	Yes, Recycle BC will provide to collectors.
	Will Recycle BC translate communication / education materials?	Recycle BC will look into this – please let us know if there are specific materials you would like translated.
Financial Incentive Methodology	Different incentives for satellite depots?	Material from approved satellite depots receive the same \$/tonne incentive as material from principal depots.
Curbside Collection	What is the new criteria for curbside adjacency?	Refer to draft program plan.
Performance Targets	Majority of collectors are facing contamination.	Request from participants: Highlight success stories, share lessons learned, share more information on data.
	Can Recycle BC do pre-screens on contamination?	Recycle BC prefers to reduce contamination through education, long term goal is to have good material in our program.
	Do you ask collectors how much they spend on contamination? Can Recycle BC support technology?	This can be considered as part of the next collection cost study.

	How can Recycle BC help us meet contamination rates, particularly for single stream?	Recycle BC works closely with collectors to support the implementation of contamination remediation plans, including with best practices documents and communication templates.
	Are you reporting recycling by material type?	Refer to draft program plan.
Pollution Prevention Hierarchy	Can you comment on changes to the program plan?	Refer to Pollution Prevention Hierarchy session.
	Reduce waste and diversion – this should be a priority area.	Refer to Section 7.

4.2.3 Accessibility and Eligibility

After hearing a presentation on the accessibility and eligibility criteria outlined in the program plan, stakeholders were asked to participate in a discussion on both Appendix B and C of the program plan. More specifically, stakeholders were asked what about the proposed criteria they supported, and what areas still needed refinement/improvement.

Elements that were supported by stakeholder include:

- Removal of 2-year garbage requirement from adjacency and equivalency criteria; and
- Inclusion of First Nations communities.

Suggestions for further refinement included:

- Clarify and refinement of organics (i.e. who does the incentive get paid out to with the introduction of organics and single-stream);
- Consider changes to the depot criteria for places where there is a seasonal population;
- As incentive rates go up, consider re-onboarding depots that have left the program;
- Small communities fear losing their services and suggest that all agreements should be renewed; and
- Island communities would like eligibility requirement of a grocery store to be reconsidered as they still have to leave to get groceries. Often residents on Island burn recycling contributing to air pollution.

Areas for further improvement:

- Grants for advancements in technology;
- Using volume as a metric rather than population is maybe a better, more inclusive metric;
- Incentive based on contamination reduction or “staff levels” for depots;
- Funding for storage in small communities that are bear proof;
- Create set hours for depots; and
- Combine mobile depots for soft plastics with other stewardship collection events.

4.2.4 Financial Incentive Methodology

Stakeholders who attended the Incentive Development session at the conference were asked to identify which collection type they most wanted to provide feedback on (i.e. curbside, multi-family or depot) and break into discussion groups. With a show of hands, stakeholders were not immediately pulled to multi-family, and therefore curbside and multi-family were grouped together. The following feedback was provided by each discussion group.

Collection Type: Depot

Survey Question	Comment
What are your main cost drivers, and how have they changed over time?	<ul style="list-style-type: none"> • Increase in labour costs, fuel, upfront operating costs and utilities. • No cost-of-living increases – reliant on a 5-year agreement which is challenging to maintain.
How can Recycle BC ensure it accurately captures your organization's collection costs? What elements are missing from the methodology Recycle BC outlined?	<ul style="list-style-type: none"> • Current timelines do not reflect the cost of living. • Satellite depot cost to manage in scope PPP. • Educational component (e.g. cost of website maintenance and engagement) • Cost of disposal of out-of-scope materials. • Contingency or emergency funds. • Incentives aren't covering the full cost of the program (only covering 25%).
What strategies or opportunities do you think Recycle BC can take on to ensure they achieve their goal of setting fair and reasonable financial incentives?	<ul style="list-style-type: none"> • Have more cost studies if there is a natural disaster. • Create a tiered payment system depending on the location of the depot (e.g. Metro Vancouver vs. rural). • Factor in asset management for equipment / Recycle BC to finance equipment. • Use baseline in cost study and then have an annual increase. • Agreements should have CPI adjustments built in. • Permit depots that have the ability to transport their own material to the applicable receiving facility the option (with payment).
What questions or feedback do you still have, if any, about Recycle BC's proposed approach to setting financial incentive rates?	<ul style="list-style-type: none"> • Agreement with the incentive increase for good best practices. • Currently no incentives to expand (to multi-family for example) if depots are not being fully compensated.

Collection Type: Multi-Family & Curbside

Survey Question	Comment
What are your main cost drivers, and how have they changed over time?	<ul style="list-style-type: none"> • Labour and fuel increase. • Supply chain costs of all aspects (box, bags, bins and carts). • Repair and maintenance, experiencing delays in parts for repair which means less trucks on the road. • Collection container back log – upwards of 7-8 months. • Repairs caused by overstuffing. • Cost of education. • Cost system impact of OCC in automated collection. • Change in receiving facilities – distance to receiving facilities is a huge hit to the budget.
How can Recycle BC ensure it accurately captures your organization's collection costs? What elements are missing from the methodology Recycle BC outlined?	<ul style="list-style-type: none"> • Environmental challenges are adding to the cost of operation. • Per household rate does not take material volume into consideration – no limit on the material. • Multi-family incentive rates by household, don't consider # of totes at each property, or the increasing volume of materials and totes.
What strategies or opportunities do you think Recycle BC can take on to ensure they achieve their goal of setting fair and reasonable financial incentives?	<ul style="list-style-type: none"> • Consider an investment in technology (e.g. electric trucks). • Consider a "special cost review" for emergency situations (e.g. snow, heat domes) or large spikes in certain critical inputs (e.g. fuel). • Totes added in multi-family could be an incentive. • Annual cost input from collectors could be done in conjunction with GHG reporting. • Create templates for promotion and education (for collectors) to make it easy for Local Government to add logos.
What questions or feedback do you still have, if any, about Recycle BC's proposed approach to setting financial incentive rates?	<ul style="list-style-type: none"> • Make the contamination threshold less punitive and use a financial incentive to promote reduced contamination (e.g. a top-up or bonus model could be used). • Incentivize efficient systems that reduce GHGs such as automation and electrification. • More upstream measures to reduce packaging that leads to contamination. • There is a disconnect between audits (infrequency and lack of data back to collectors). They don't support collectors rolling out best practices, but they do penalize collectors. • Use artificial intelligence for contamination (i.e. Prairie Robotics / Rover).

4.2.5 Performance Targets

What We Heard:

During the conference, stakeholders were asked about their levels of agreement on Recycle BC's proposed targets and associated methodology. The results are presented below. Then, using the surveys as a platform for discussion, the stakeholders were asked several discussion questions.

1. How much do you agree or disagree with Recycle BC's proposal to maintain the use of the Offset Recovery Rate methodology for the program recovery rate?

	%	# of Respondents
Agree	50%	12
Neither Agree nor Disagree	38%	9
Disagree	8%	2
Strongly disagree	4%	1

2. How much do you agree or disagree with Recycle BC's proposal that the program recovery targets will be net of non-PPP beginning in the 2023 reporting year?

	%	# of Respondents
Strongly agree	36%	9
Agree	48%	12
Neither Agree nor Disagree	16%	4

3. Does the proposed methodology arrive at the program recovery rate targets that make sense to you and/or your organization?

	%	# of Respondents
Yes	59%	13
No	14%	3
Not Sure	27%	6

4. How much do you agree or disagree with Recycle BC's proposal to utilize the Aligned Recovery Rate methodology to calculate the material category performance targets?

	%	# of Respondents
Agree	59%	13
Neither Agree nor Disagree	41%	9

5. 2025 Annual Report Year (2023 Collection / Supply Year) - What do you think about these targets, keeping in mind this is the baseline target which will be increased if it has been achieved for two years?

	Not far enough		About right		Too ambitious	
	%	# of Respondents	%	# of Respondents	%	# of Respondents
Paper Target - 95%	4%	1	88%	21	8%	2
Plastic Target - 55%	71%	17	29%	7	0%	0
Rigid Plastic Target - 71%	32%	7	68%	15	0%	0
Flexible Plastic Target - 24%	68%	17	28%	7	4%	1
Metal Target - 88%	8%	2	92%	23	0%	0
Glass Target - N/A	0%	0	100%	4	0%	0

6. 2027 Annual Report Year (2023 Collection / Supply Year) - What do you think about these targets, keeping in mind this is the baseline target which will be increased if it has been achieved for two years?

	Not far enough		About right		Too ambitious	
	%	# of Respondents	%	# of Respondents	%	# of Respondents
Paper Target - 96%	4%	1	88%	21	8%	2
Plastic Target - 56%	55%	12	46%	10	0%	0
Rigid Plastic Target - 72%	33%	8	67%	16	0%	0
Flexible Plastic Target - 25%	67%	16	33%	8	0%	0
Metal Target - 89%	8%	2	92%	22	0%	0
Glass Target - 98%	5%	1	77%	17	18%	4

Survey Question	Comment
What are the pros and cons of aligned vs. offset recovery rates?	Aligned:
	<ul style="list-style-type: none"> Aligned Recovery Rate is a better representation of recovery rate, though prefer showing recovery rate by both methodologies. Aligned is more accurate and timely.
	Offset:
We asked you about the proposed methodology and whether it arrives at the program recovery rate targets that make sense to you - can you tell us about why you chose yes/no or you were unsure?	Both:
	<ul style="list-style-type: none"> Can you show both aligned and offset? If doing both, could have a more accurate baseline.
	Makes sense:
	<ul style="list-style-type: none"> It makes sense to remove non-PPP because it makes it more accurate.
	Recommendations / still need clarity:
	<ul style="list-style-type: none"> Yes, to removing non-PPP, but clarity on how the 5% number was conceived? Plastics targets should be higher.

	<ul style="list-style-type: none"> Increases are 1% vs. 2-4% in previous years. Does the methodology reflect an aggressive push? How can we calculate a boost in specific materials? Suggest checking on moisture content in fibre and how much it counts towards collection. As long as the methodology is well explained in the report for collectors to share back to stakeholders, then it is reasonable.
Do you agree with the new calculation proposed? Why or why not?	<ul style="list-style-type: none"> Yes, in agreement. What do producers say? How much do they want to see in these reports? Yes, agree – ensure that it is adequately defined in the steward and annual reports. Make sure there is a clear definition of non-PPP and a very clear formula for calculation. People agree that contamination should be pulled out, but with this – the target seems too low. Ensure that this is well communicated in reports.
What elements of the proposed methodology, targets and times make sense to you or still need consideration?	<ul style="list-style-type: none"> Recovery rate for plastics is too low. Additional education is required for rigid plastics, on Recycle BC in general, and access to educational materials in multiple languages. Recycle BC should recycle books. Producers should be required to label packaging with respect to recyclability. Recycle BC should provide incentives to collectors to invest in technology. Set more challenging targets. Rename “off-set” and be clear on “confirmed” or “audited”. Update Recycle BC website to have “where does my recycling go” front and centre – with pictures, not just descriptions.
What are innovative ways that Recycle BC could increase the program's recover rate and collect more material?	<ul style="list-style-type: none"> Add additional trucks – partner with more retailers. Need more advertisement / education on the ability to recycle plastics. Simplify – sorting is too challenging for people. All plastics should go to curbside.

4.2.6 Pollution Prevention Hierarchy

The pollution prevention hierarchy session at the collector conference was hosted by Recycle BC on October 6, 2022. The session included a presentation followed by a group discussion and a brainstorm activity of ideas applicable to each step of the pollution prevention hierarchy (PPH). In the first activity, participants shared their thoughts on what was missing from the program plan. In the second, participants were asked to write on post-it notes ideas to improve and innovate the program's approach to the PPH and place them on the related hierarchy step on the wall. The following tables show the results of both activities.

What We Heard:

Survey Question	Comments
What is missing from the program plan pertaining to the Pollution Prevention Hierarchy?	<ul style="list-style-type: none"> • Businesses should increase support for the reuse cycle. • Recovery rates should be communicated publicly as a good news story. • Recovery rates by material should be more transparent. • Is it possible to change the efficiency of the collection program? There is a need for bi-weekly collection. • The fee structure (cost vs. performance metrics) should be clearer in the program plan.

Pollution Prevention Hierarchy Activity:

Pollution Prevention Hierarchy	Ideas
Reducing environmental impacts	<ul style="list-style-type: none"> • Rename Recycle BC to reflect the pollution prevention hierarchy. • Recycle BC should work on reduction to tackle the top issues. • Consider how to focus on necessary and real needs – more cost to items that are not necessary. • Address, continue, or expand campaigns for “litter” (e.g. pack lean, leave clean). • Support recycling collection, energy recovery, and disposal for litter shoreline cleanups of SUP / PPP, for both access to streams and financial support. • Fees should be lower for packaging associated with essential goods and higher for non-essentials

Redesign	<ul style="list-style-type: none"> • Provide incentives for marketing to look at alternative ways to design products. • Add specifics and more information about Recycle BC communication with stewards. • Add more information about incentives and disincentives to improve packaging and include more metrics to support it. • Find ways to discourage producers to continue manufacturing unnecessary packaging • Encourage and give incentives to producers to manufacture environmentally friendly products. • Provide grants to applicants to redesign and innovate. • Consider an art competition for Recycle BC materials having first, second and third places, and use the art for future campaigns. • Increase the fee structure to drive redesign innovation, although it is a small player.
Reuse	<ul style="list-style-type: none"> • Free store / reuse at depots (wording included in the SOW/MSA) with depots with proper compensation (e.g. cardboard boxes, mason jars, etc.). Many people want access to material at the depot. • Work with depots to have a “reuse” section for Recycle BC products. • More posts about reuse for packaging as a campaign (packaging as an art campaign, Surfrider has done that with cleanup material). • Encourage depots to set aside certain items for reuse: bubble wrap, moving boxes, mason jars, clean buckets, egg cartons, etc. • Create a small granting program for people working at the top of the PPH. • Partner with awesome creative reuse centres such as supply and run a campaign with them for packaging and maybe even the new items (packaging like products).
Recycling	<ul style="list-style-type: none"> • One multi-compartment curbside bin, color-coded to material type, with appropriate size compartments for material, with specifically designed truck compartments to tip them. • Consider chemical recycling. • Recycling system to manage Recycle BC receptacles – shows residents that Recycle BC is participating in goal to reduce single use items. • Foster best practices groups for collectors at curbside (Regional Districts, municipalities, etc.). • Maintain bi-annual meetings. • Recycling or reuse of broken blue bins. There is no space to store broken bins. • Recycling rates alongside recovery rates by material type. • Recycling detention – violators must attend an obligatory class.
Material Recovery	<ul style="list-style-type: none"> • Unsortable – increase messaging and education to reduce bagging.
Energy Recovery	<ul style="list-style-type: none"> • Residuals for alternative fuels (cement kilns take compostable to offset coal).

Disposal

- More waste composition studies.
 - Explain the “Why” behind non-accepted items – helping people understand will make them remember.
 - Cost for producers for packaging types that have high disposal rates.
 - Collect and consolidate waste composition studies.
-

5. Stakeholder Workshops

5.1 Approach and Process

In November 2022, seven online workshops were co-hosted by Recycle BC and Pinna Sustainability. Workshops were held on zoom, and ran in duration from 60-120 minutes. At each session, a presentation on the program plan was provided by Jordan Best (Western Canada Director, Collection) followed by a question-and-answer period. In some cases, additional discussion was hosted through Slido – an online engagement platform. The stakeholder workshops that were held, and are reported on next, include:

- Stewards;
- Collectors;
- BC Product Stewardship Council;
- First Nations;
- Environment and Public;
- BC Bottle and Recycling Depot Association (BCBRDA); and
- Stewards Association.

5.2 Key Questions and What We Heard by Stakeholder

5.2.1 Stewards

Key Topics of Interest:

Stakeholders who attended the Stewards (i.e. producer members) workshop were primarily interested in the approach to defining obligated producers, and providing input on the targets. Several questions emerged about post-collection, the Pollution Prevention Hierarchy and packaging.

What We Heard:

Topic	
Producer Members and Definition	<ul style="list-style-type: none"> • Change to Canada brand holder. • Please work with other provinces to harmonize definitions across Canada.
Performance Targets	<ul style="list-style-type: none"> • The use of two different methodologies seems confusing. • Supply and collection should be in the same year – aligned is more accurate. • Are there any comparisons during reporting between the program recovery rate and the material-specific recovery rate? If so, and if the two recovery rates have different methodologies, how will this be explained? • There may need to be different supply and collection years for different material categories. For example, a newspaper is supplied and collected in a very short period of time, while a large bottle of laundry detergent may be supplied and collected in different years.
Pollution Prevention Hierarchy	<ul style="list-style-type: none"> • Would it be appropriate to include chemical recycling somewhere on the hierarchy? • What's the difference between engineered fuel and energy from waste? Why would one be considered part of the plan but not the other?

Question & Answer:

Question	Answer
Can you tell us what consultation CCME had with producers when they created their EPR document?	We cannot speak to the level of consultation completed by the CCME.
What category does Recycle BC put advanced/chemical recycling in (e.g. to process mixed plastic film)?	Plastic film is mechanically recycled, not chemically. If the product is converted into engineered fuel, it is not considered recycling. However, if a product is transformed back to its original form (e.g. polystyrene to polystyrene through a chemical process), then it is considered recycling.
Do you define 'domestic' markets as including the US?	Yes, anything in North America is considered domestic.

Is a 94% recovery rate the result of a change made or is it an outlier?	The offset methodology was very stable year over year, as outlined in the program plan. During the pandemic, however, collection increased while that number was being compared to the supply from two years previous. However, looking at the Offset methodology, we are still at 87%, which is very high.
Does the regulation specify that performance is reported on the collection of PPP and not the PPP actually recycled and sent to an end market?	Yes. The recovery rate calculation is a comparison of the amount collected compared to the amount supplied by members into BC. .
Given that you are referring to a collection rate, can you start calling it as such (i.e. collection rate, not recovery rate)?	The reason we call a recovery rate is to be aligned with the BC-based regulation.
Can you explain how plastic film other than LDPE and HDPE, (e.g. PVC film and PP film) are recycled in BC?	Merlin Plastics took on this R&D initiative. We have been giving them a supply of material and they have expanded their equipment and R&D. It is their proprietary process, so cannot go into detail. But we need to continue working with the Canada Plastics Pact and Merlin Plastics, to get more value out of that material. For now, it is a huge step to be able to transform it into something new.
What is the definition of packaging?	Primary packaging, secondary packaging, transportation packaging and service packaging.
Can you quantify the financial impact on Recycle BC of milk and milk substitutes moving out of the blue box and into the deposit system?	Recycle BC no longer receives fees from producer members on the supply of these materials, but is also no longer responsible for collecting and managing them. Milk and milk substitute containers that are placed in Recycle BC's system by residents will still be managed responsibly by Recycle BC, and we coordinate directly with Return-It to recover this cost.

5.2.2 Collectors

Key Topics of Interest:

Collectors who attended the online workshop had many of the same concerns as those who attended the collector conference. Stakeholders asked that Recycle BC consider including hours of operation as a requirement for depots, that the rural collection parameters be revisited and more emphasis be placed on multi-family collection. Stakeholders asked that the incentive rates be reviewed as they don't meet the current financial realities of running a depot. Stakeholders support the removal of contamination from the recovery rate methodology but feel that the targets should be higher. Emphasis on reuse and supporting producers to provide plans to take reuse into account was encouraged.

What We Heard:

Topic	
Accessibility and Design	<ul style="list-style-type: none"> • Accessibility should include appropriate hours of operation. • More emphasis on multi-family collection. • More than one depot in relation to large communities. • Rural collection parameters are too restrictive. • Is there emphasis on moving from single-stream to multi stream collection, what is ratio?
Financial Incentives Methodology	<ul style="list-style-type: none"> • Increase the educational financial incentive. • Increase incentives applied to depots – current incentives do not come close to true cost of running depot. • Promote ideas generated by collectors to improve recovery rates. • Reconsider how incentive rates are calculated once curbside is added – depots already suffer due to reduced tonnage. • Provide opportunities for grant applications. • Support the development of educational materials.
Performance Targets	<ul style="list-style-type: none"> • Targets should be higher (in general). • Flexible plastics target is too low. • Provide education on how the targets will change due to combination of overwrap and flexible plastics. • Create more tangible units (i.e. 1000 cans of food were sold, and 900 were recycled). • Support the removal of contamination.
Pollution Prevention Hierarchy	<ul style="list-style-type: none"> • Continue to dis-incentivize flexible plastics. • Increase emphasis on circularity. • Lower producer fees for packaging that is truly compostable. • Create an actual proportional hierarchy – show how much of the material recycled is recovered or disposed of. • Should consider waste to energy or chemical recycling options. • Require producers to outline plans to participate or support reuse programs and activities.

Question & Answer:

Question	Answer
When will squishy foam be accepted?	Effective January 1, 2023 it will be included in the new Flexible Plastics category.
Does Recycle BC actively research the extent and causes of public distrust? Is this changing over time?	Recycle BC regularly completes resident surveys. There have been a lot of media stories that did not represent the reality of recycling in BC, lumping BC with the rest of Canada.
Milk cartons, related containers, as well as tires: Why are they not part of the Recycle BC universe?	Milk and milk-substitute containers were removed from the Recycle BC program when a provincial regulatory change included them in the deposit return program. Tires are managed under a separate stewardship program by Tire Stewardship BC.
Has equity been taken into consideration with the collection system, beyond accessibility?	Communication materials are designed in multiple languages.
It was mentioned the combined soft plastics stream will be manufactured into a lower-grade plastic pellet. Is this different/lower than the bags/overwrap stream has been?	After years of research and development, in 2022 Recycle BC's end market for plastics was able to effectively recycle other flexible plastic packaging. By effectively diluting this hard to recycle material within enough good quality material, it can become an input into recycled plastic pellets applicable for many manufacturing uses. As such, the creation of the new flexible plastics category does not have an adverse effect on the outcome of the plastic bags and overwrap within this new collection category.
Will Recycle BC start to require depots to have certain hours/days of operation? Right now, Recycle BC is leaving it to the site to determine the best fit - but what happens if that's not truly a good fit for the community?	It's not something we considered nor is it in existing agreements. We can consider this in the future. We do hear this challenge from certain communities.
Will communications start to produce material in other languages?	There are a number of materials available in different languages. If there are additional resources collectors and producers want to see translated, let us know.
Will Recycle BC bring back the Community Champions program?	This is something we will consider based on the interest.
Will combining overwrap and flexible plastics and adding squishy foam change any of the proposed targets?	Plastic bags and overwrap and other flexible plastic packaging have always been considered together when reporting against our Flexible Plastics targets, therefore this new collection category won't change any of our reporting practices. If this added convenience to residence results in a dramatic increase in collection of this category, our targets are set to be recalculated automatically if achieved for more than two years in a row.

5.2.3 BC Product Stewardship Council

Key Topics of Interest:

Members of the BC Product Stewardship Council who attended the zoom workshop expressed concern about the new Integrated Collection System (ICS) Criteria, in particular, how it would impact those that are currently in the program, but no longer meet the criteria. A request was made to honour or grandfather in all those communities that will no longer meet the criteria, but are currently included in the Recycle BC program. Questions and comments also emerged on incentives, and Recycle BC was asked to be more transparent on their costs and contamination rates where they run services. Stakeholders agree with the removal of contamination from the recovery rate methodology but suggest that a target increase of <1% is not ambitious enough.

What We Heard:

Topic	
ICS Criteria	<ul style="list-style-type: none"> Existing depots should be honored / maintained by Recycle BC into future contracts. Please consider small and remote communities – there are many, but voices are small and needs are great. Concerns about the terminology – “meaningful contributions”.
Financial Incentives Methodology	<ul style="list-style-type: none"> Think outside the box for remote communities, dry storage and annual pickup? Report Recycle BC contamination rates in areas where Recycle BC runs services and education. Request feedback from Regional Districts. Take depot/curbside performance into incentive structure – reward high quality material. Be transparent with Recycle BC costs in direct service areas. Review current and past incentive rates – ask collectors what portion of costs are covered by incentives.
Performance Targets	<ul style="list-style-type: none"> A <1% increase in recovery rate annually is not ambitious enough. Agree with removal of contamination. Agree that targets should increase once they have been achieved 2 years in a row.
Pollution Prevention Hierarchy	<ul style="list-style-type: none"> Producer fees do not provide enough incentives to promote the golden design rules. Could we disincentivize single-use foam products?

Question & Answer:

Question	Answer
Polystyrene foam targets?	No specific reporting structure or target. Included in rigid plastics methodology.
Methodology: Why 2 years to report?	It is two years because our producers report the sales of the previous year in May of the current year, then we prepare the fees to be paid in the upcoming year to correspond to the collection and management of the PPP in that year.
Do existing depots that are no longer under new criteria lose participation in the Recycle BC program?	Refer to Section 7.
For determining distances between cities for ICS criteria what location is used (e.g. city limits, city centre)?	Outlined in Appendix C and shifts depending on the category, but tends to be around the center of a community.
List of depots that do not meet eligibility criteria?	You can contact Recycle BC and they are happy to share analysis for the region you are interested in.
Is the 5% contamination recycled or not?	It depends on the material. Recycle BC recycles what it can (e.g. scrap metal), but a lot of contamination is unrecyclable garbage.
When talking about available PPP in the province, is that based on residents with access to the program of the province as 100%?	The entire population of BC is considered in the accessibility metrics reported on annually by Recycle BC.
Any opportunity to discuss with Recycle BC the contracts and their contents? And what are the milestones to transfer to direct service?	Recycle BC will be engaging collectors in 2024 on the terms of new collection agreements that would be applied in 2025. Refer to the program plan for further details on transition timelines.
Any language on service performance?	The very last appendix in the program plan includes all the metrics used. Recycle BC provides collection tonnage by Regional District.

5.2.4 First Nations

Key Topics of Interest:

The discussion at this workshop was focused primarily around capacity and partnerships. First Nation stakeholders highlighted the competing priorities and initiatives that they are spread between. It was suggested that increased partnerships, particularly with local governments (including Regional Districts) could support their efforts, either through joint service agreements or by using a common depot. Attendees highlighted several groups that could support engagement and communication about the services that Recycle BC offers.

What We Heard:

Topic	
Partnerships and Information	<ul style="list-style-type: none">• Create partnerships with First Nations, towns & local governments to connect on service agreements.• Support pilot studies with Regional District depots to have First Nations communities bring material to them.• Highlighted IZW TAG as a key group that could support getting the word out.• Acknowledged that the First Nations Recycling Initiative (FNRI) / Recycle BC partnership is helpful for connecting many stewardship groups through one point of contact.• When budget allows, getting out to the communities in person is a great way to engage.
Financial Incentives Methodology	<ul style="list-style-type: none">• Noted recent need to renegotiate funding for waste with Indigenous Services Canada – unfortunate that this has to happen every 5 years.
Capacity	<ul style="list-style-type: none">• Communities are stretch thin with various projects and responsibilities.

5.2.5 Environment and Public

Key Topics of Interest:

The stakeholder who attended the environment and public online workshop were primarily interested in discussing the new Integrated Collection Services criteria, different types of materials that are collected, and how they are handled post-collection as well as inquiring about and providing suggestions on how to progress through the Pollution Prevention Hierarchy. Specifically, this group worried that the new ICS criteria will impact communities that are already being serviced, and wished for more clarity on how these criteria were developed. Also, questions emerged about different materials (e.g. textiles, newspapers) and how they are handled / incorporated into Recycle BC program. Further, stakeholders suggested more work around reuse and the implementation of fees to disincentivize the use of certain products. Stakeholders were also interested to hear about how Recycle BC works with depots locally and overseas recycling end markets to ensure proper environmental outcomes.

What We Heard:

Topic	
ICS Criteria	<ul style="list-style-type: none"> Concerns about communities that will no longer be serviced – clarity on what is driving the new criteria. Clarity required on how many depots each community can have.
Post-Collection	<ul style="list-style-type: none"> Provide additional information on checks and balances for post-collection sites.
Pollution Prevention Hierarchy	<ul style="list-style-type: none"> Clarity required on how Recycle BC require / encourage producers to move up the hierarchy of design. Introduction of red box for reuse, is there opportunity for a reusable pilot? Suggest new fees on certain types of materials (e.g. polystyrene) to disincentive use.

Question & Answer:

Question	Answer
How Recycle BC is justifying having limits to adhere to the program plan if it is supposed to cover BC?	Refer to Section 7 below.
New criteria: max number of depots in a municipality?	The eligibility criteria defines eligible communities but does not dictate a maximum number of depots per municipality.
Product design change – examples linked to the Recycle BC program? How does Recycle BC encourage producers to move up the hierarchy of	Refer to Section 7 below.

design? Are there limits to what Recycle BC can do to drive change?	
Waste hierarchy - Any metrics around reduction that Recycle BC is tracking?	Refer to Section 7 below.
Any goals of metric in the new product categories?	Producer fees are based on the material type not on the type of use (e.g. single-use items).
Eligibility criteria – what are driving eligibility limits? And after the Recycle BC’s gap analysis, what communities would not be serviced?	Refer to Section 7 below.
Fees on the type of material could disincentivize polystyrene and avoid flexible plastics from going to low-value products (e.g. pellets) so no potential to be circular. Reuse: looking at a red bin for reusables – can this start at a depot and even extend to a curbside collection?	Fees: Expanded polystyrene attracts the highest producer fee rate at present, which is a way to disincentivize its use. Reuse: Refer to Section 7 below.
Newspaper companies and fees: are they paying fees?	Newspapers have historically had their own program plan and are not members of the Recycle BC program.
Textiles: recent discontinuation on BC – is there any plan to solve the issue of textiles collection?	Focused on our mandate which is residential PPP only.
Reusables – any opportunity to outline a reusables pilot?	Still in the stage to figure out how Recycle BC can best serve the community and look for opportunities. Getting this feedback from stakeholders is part of it.
In terms of EPR fees, what is Recycle BC doing to connect with producers to influence change in which type of packaging they should use?	Refer to Section 7 below.
Are we encouraging lower and flexible packaging or disincentivizing? Or are we making low-grade plastics more acceptable?	Multi-material flexible plastics are still more challenging to recycle than other flexible plastics. We will continue to work with groups like the Canada Plastics Pact to encourage producers to move to more easily recyclable flexible plastics.
Materials not captured by Recycle BC – are the producers taking responsibility?	Producers pay fees on all PPP supplied into the BC marketplace for residential use. In turn, Recycle BC has to achieve the recovery rates defined in the approved program plan. Any PPP not set out for collection within the Recycle BC program cannot be claimed as recovered under our program’s reporting, but is included in the supply by steward producers.

<p>Post-collection – if the material can't be recycled, how do you monitor what is overseas and make sure everything is ok? And plastics?</p>	<p>If material can't be recycled, it follows the pollution prevention hierarchy, meaning it is made into an engineered fuel if possible, otherwise it is sent to a local landfill. All end markets are approved by Recycle BC to ensure they are managing our materials responsibly. As part of the due diligence process, members of our team visit the facilities that recycle the material, including those overseas. With the exception of some expanded polystyrene, all plastics are processed in BC and not shipped overseas.</p>
<p>How do you ensure depots are doing things correctly?</p>	<p>Recycle BC has field employees who visit depots regularly.</p>

5.2.6 BC Bottle and Recycling Depot Association (BCBRDA)

Key Topics of Interest:

Members of the BCBRDA were primarily concerned about costs, education, and how their voices can continue to be heard by Recycle BC. Stakeholders were worried that the current mechanism to change collection incentive rates does not reflect the market (e.g. inflation, labour costs) and that this should be reviewed more often than every 5 years. They also expressed concern about the increase in contamination at depots and the ability to maintain staff to remove contamination. Stakeholders expressed the need for guidance and leadership from Recycle BC to educate consumers about abandoned material and hazardous waste. BCBRDA member were also interested in gaining more voice and potentially getting a seat on the Recycle BC advisory committee.

What We Heard:

Topic	
Accepted Materials	<ul style="list-style-type: none"> We get a lot of abandoned material and issues with household hazardous waste, which increases logistics difficulty getting it out of the depot. There is no promotion and education to educate consumers and do not know what to do. Need clarity on hazardous waste – signage, educational material, etc. Need something quick that does not involve a lot of training. Squishy foam: do not mind combining squishy foam in Flexible Plastics, but there might be an issue of receiving other types of foam in that new category. If there is an opportunity to have separate wording for squishy foam so that's separate, it could be helpful.
Financial Incentive Methodology	<ul style="list-style-type: none"> Plans should have a mechanism to change rates if there are changes in the market (inflation, etc.). Already in trouble with the rates, and there is no time to wait until 2025. Already suffering in the current market. There is increasing contamination because cannot maintain staff to do a good job. Mixed container rates are too low and not feasible for depots.
Pollution Prevention Hierarchy	<ul style="list-style-type: none"> Work with the depot association to set up terms of reference, the scope of work, and methodology before going to the consultation process. This would enable better communication with depots and the information that they would need to share.

Question & Answer:

Question	Answer
How does Recycle BC help depots with transferring squishy foam to landfills?	This material will be included in the Flexible Plastics category effective January 1, 2023.

Recycle BC, 2022 Consultation Report

Is there a way to set up an infrastructure loan program to buy equipment through Recycle BC? Also reduce GHG.	Recycle BC is looking at opportunities and barriers to depots and how to structure its incentive rates. We will consider this feedback.
Can we also include garbage bags?	Garbage bags are excluded from the definition of single-use items captured by the province's regulatory amendment and so are not included in the program.
With no incentive rate increases on the horizon until 2025 – do you think that businesses could leave the program?	There are some depot additions and exits most years but in general we have maintained good participation from depots in the program.
Plastics – starting January would we be able to include items that are on the single-use ban list in the plastics bins? Most of the issues are with plastics that go in the mega sacs.	The list of materials accepted is now available on Recycle BC's website.
Appendix C, West Kelowna – it sounds like this is an oversight and no one would like to see depots disappear in the area. Should Recycle BC add a caveat in the appendix to exclude West Kelowna from these criteria?	Refer to Section 7 below.
Can Recycle BC commit to another meeting in regards to discussing compensation for the products that the group has more concern about?	Yes. We are open to increasing collaboration between Recycle BC and BCBRDA.
Recycle BC advisory committee: can BCBRDA get a seat on it?	The advisory committee is a broad stakeholder group. We will consider this feedback.
Are pop-up depots efficient? What are the costs vs. having a full depot?	Recycle BC trialed a series of pop-up depots. There are differences, but it is comparable. Recycle BC is continuing to study this and will do another trial or another round of it in the future.
Cost drivers: any opportunity to have that discussion to re-evaluate handling fees in the near future?	We will consider this feedback.
Is there a market for combined plastics material?	After years of research and development, in 2022 Recycle BC's end market for plastics was able to effectively recycle other flexible plastic packaging. By effectively diluting this hard to recycle material within enough good quality material, it can become an input into recycled plastic pellets applicable for many manufacturing uses.

5.2.7 Stewards Association

Key Topics of Interest:

Representatives of the steward's association were primarily concerned with the way Recycle BC reports its governance structure and its definition of producers, which is not aligned with the other provinces. They were also worried about the inclusion of single-use items soon to be banned and wanted clarification on incentives and penalties for adherence to the Golden Design Rules.

What We Heard:

Topic	
Extended Producer Responsibility Agency	<ul style="list-style-type: none"> There are concerns with the way Recycle BC reports its governance structure, which is not considered transparent to the general public and stakeholders The producer definition is not the same as the other provinces, which may cause issues for both Recycle BC and its members. This also seems to go against the goal of harmonization.
Single-Use Products	<ul style="list-style-type: none"> Do not put so much effort into inclusion of single-use-products since they will soon be banned at the federal level.
Performance Targets	<ul style="list-style-type: none"> It is better to have only one calculation method for reporting both recovery rates, while the other could be used for reference only.
Pollution Prevention Hierarchy	<ul style="list-style-type: none"> Recycle BC should not penalize non-adherence to golden design rules, since they are not enforceable.

Question & Answer:

Question	Answer
Definition of governance:	
<ul style="list-style-type: none"> Recycle BC's governance structure, which is not representative of the producers, should be made more transparent to the general public and other stakeholders so that they aren't blaming retailers for what Recycle BC does. Recycle BC does not spell out whether they operate as a not-for-profit corporation and which Act, whether it is the Society's Act or the Not-for-Profit Corporations Act, they fall under. Recycle BC does not provide the web page link to their federal court, programs, federal corporation information and the other two items listed under agency governance. Either the producers themselves or the trade associations who represent those producers should be members of the corporation to be 	Refer to Section 7 below.

able to vote on the constitution of the board rather than have it imposed upon them by existing directors.

Definition of producer:

- The producer definition used by Recycle BC is not identical to that used by other provinces:
 - Every other jurisdiction other than BC defines the producer as being the brand holder of designated materials or the brand holder resident in Canada, not a particular province.
 - Feedback from the Ministry says that the definition should be the same as in use in other provinces (i.e. Canada).
 - Recycle BC and the Ministry should have the same legal advice and direction.
- There are two potential issues with Recycle BC producer definition:
 - Recycle BC may have potential revenue leakage when people inadvertently underreport because they are not including things that should be included.
 - Members may overpay because they are duplicating reporting into BC what they are reporting into other provinces.
- In order to harmonize with other provinces, Recycle BC needs to align the producer definition with the others.

Refer to Section 7 below.

Why is Recycle BC deducting non-PPP assuming a 5% contamination rate if there is an audited process to calculate it?

The 5% is not an average or assumption, it's the true number, stable year over year. It changes in the decimals only. We are using the audited data for the calculation.

Since most of the products listed as single-use-items have already been banned in plastic form by federal regulation we want to confirm that: One, we are not going to spend two years building an EPR program for products we know are soon leaving the market and two if they are not specific to plastic, that we are not building an EPR for paper straws that don't last a long time.

The inclusion of single-use items is required based on the province's regulatory amendment. As some of these materials are banned in the future, it is expected we will receive significantly less of them in the collection system.

How does Recycle BC engage with municipalities when they are looking to prohibit single-use plastic items? Every time a municipality bans a single-use

It is not within Recycle BC's mandate to provide feedback on single-use plastic bans. It is something best suited by producer associations directly. Recycle BC can talk about how it is managed under the program, what is

item or packaging, they are really countering the aim of having a harmonized system province-wide.	recyclable, what is collected and what are the benefits of recycling and a harmonized program across the province.
Why do some materials have more than a 100% recycling rate?	It is due to the two-year reporting delay. If we are looking at the 2021 annual report, we are looking at 2019 supply numbers. However, 2021 collection numbers were very much still in the pandemic. We expect that to come back down.
The Golden Design Rules are a guidance to the industry and not enforceable at this point in time. There is no assumption that everyone will be able to comply with these guidelines within a particular timeframe, and it is not necessarily applicable to all products (e.g. health products). Recycle BC can think about incentives, but we want to ensure we are not penalizing because it is not a question of adherence.	Refer to Section 7 below.
Is the growing proportion of materials staying in BC or North America mostly because of plastics or fibres as well?	Plastics have been marketed predominantly within BC (over 97%). However, paper has had a dramatic shift, with better quality output from our program, and more investment in North American mills there is the ability to market much more paper into the North America market.

6. Written Feedback

6.1 Approach and Process

Throughout the consultation process (September 29, 2022 – December 31, 2022) written feedback was accepted via mail and email. The opportunity to provide written feedback was shared through Recycle BC's website, at the Collector Conference, at each of the online workshops and through social media. Recycle BC received a total of 52 formal written submissions according to the following breakdown:

- Depots and depot associations - 3
- Environmental and community organizations - 8
- Local governments – 33
- Producer associations – 1
- Residents - 7

In January 2023, written feedback was collated, reviewed and summarized using Microsoft Excel – then feedback was grouped by section of the program plan and further summarized for clarity. The table below highlights the most common themes raised, summarized by section. To better understand the weight behind each summary, counts have been provided – where the number represents the number of times that the feedback was heard (i.e. a comment was discussed by a few respondents (2) vs. many (10+). The count associated with each summary is an approximate number. Appendix 1 includes all written submissions provided to Recycle BC.

6.2 Summary of Feedback

Topic	Count
2.2 Administration of the Program Plan	
Advisory Committee:	
<ul style="list-style-type: none"> • Expand membership of the Advisory Committee to include additional stakeholder groups; • Regularly review the membership and mandate; and • Include minutes, recommendations, and Board of Director responses on the Recycle BC website. 	2-4
Board of Directors:	
<ul style="list-style-type: none"> • Expand Board composition to include a wider range of stakeholders and ensure transparency of elections; • Report on how Board members are trained in annual report; and • Ensure members of the Board can influence the design of producer packaging. 	2-4
Membership in Organizations:	2-4
<ul style="list-style-type: none"> • Report on organizations that Recycle BC is a member of. 	
2.3 Producer Members and Definition	
Small Producers:	2-4

Recycle BC, 2022 Consultation Report

- Recycle BC should work with the MOECCS to lower the exemption amount that permits small businesses and small volume producers to not participate in the program

Non-Members:

- Report on the percentage of producers that are not members of Recycle BC, the number Recycle BC is actively recruiting for membership per reporting cycle and the number referred to the MOECCS for compliance procedures; and 2-4
- Outline actions to address “free-rider” producers, and ask MOECCS to embark on compliance.

2.4 Program Financing

Not-Accepted PPP:

- Fees paid by producers for not-accepted PPP should be significantly higher;
- Costs of managing not-accepted PPP in the garbage stream by local governments should be offset with fees paid by producers for not-accepted PPP; and 5-9
- Fees paid by producers for not-accepted PPP should be put into a dedicated fund for research and development, promotion and education, and end-market development.

Incentivize Packaging Shifts:

- Leverage fee structure to move producers away from harder to manage/recycle material like flexible plastics and foam; and 10+
- Develop variable environmental handling fees based on criteria like lifespan, use of refillable/reusable containers and recyclable materials to drive design change.

Collection Costs:

5-9

- Ensure producer fees are high enough to cover full cost of collection.

Deposit Containers:

1-4

- Outline how to manage deposit containers collected in program and deposit rates.

3.2 Paper Product

Books:

5-9

- Program should include books; and
- Work with the MOECCS to expand scope of Recycling Regulation to include books.

3.3 Single-Use Products and Packaging-Like Products

Support for Inclusion:

10+

- General support for inclusion of single-use products and packaging-like products in the program.

Reduce:

2-4

- Focus on reduction of single-use products and packaging-like products in the market.

3.4 Sources of PPP

Schools:

2-4

- Include PPP from schools in program.

ICI Materials:

5-9

Recycle BC, 2022 Consultation Report

- Explore opportunities and pilots to collect from ICI facilities that generate residential-like PPP;
- Offer service to manage ICI materials for a fee to collectors; and
- Accommodations of all types (e.g. hotels, long-term care facilities, universities) should be included in program even if medical care and services are provided on-site.

4.3.2 Acceptable Materials

Compostable PPP:

- Ensure any material sent to an organics processing facility can actually break down and establish own processing system if required; and 2-4
- Should not support collection of compostable plastics.

Not-Accepted PPP:

- Not-accepted PPP should not be included in count towards contamination thresholds applied to collectors; 5-9
- Phase out not-accepted PPP, and do not expend resources on trying to make it recyclable; and
- For applicable material, report on progress of steps outlined in program plan in annual report.

4.3.3 Curbside Collection & Appendix B

Direct Service Collection:

- Support for existing model and how it works in applicable communities; and 2-4
- Local governments should retain ability to provide operational direction and maintain connection to residents.

Curbside Eligibility:

- Any community that wishes to implement curbside collection should be eligible; 2-4
- Once a community wishes to provide service it should be included in program within one year; and
- Clarification requested on eligibility under equivalency criteria for interior communities accessed by short, on-demand ferries.

Transition to Provision of Service by Recycle BC:

- Clarification requested on how 90 kg/HH threshold was determined; and 2-4
- Local governments should have opportunity to transition more frequently.

4.3.4 Multi-Family Collection

Multi-Family Accessibility:

- Increase amount of multi-family buildings serviced under the program;
- Report on percentage of buildings serviced by community and Regional District; 10+
- Implement targeted campaigns to building owners and stratas so they are aware of opportunity to participate in the program; and
- Increase incentive rates for multi-family collection to increase participation levels.

4.3.5 Integrated Recycle BC Collection Services & Appendix C

Concerns about the Eligibility Criteria:

- Reduction of depot services in region, increase in material landfilled, curbside contamination, increase in resident complaints and greenhouse gases; 10+

Recycle BC, 2022 Consultation Report

- Loss of remote depots in region would create additional pressures on centralized depots that meet criteria, including parking and storage;
- Capital costs that were historically applied to depots to bring up them up to program standards that no longer meet eligibility;
- Criteria limits new depots in communities that warrant one; and
- Costs if required to manage depots not in our program, including extra satellite/ transportation costs.

Eligibility Criteria Recommendations:

- Criteria should consider seasonal residents not just permanent population;
- Include a firm commitment to continue partnership with all existing depots;
- Annual collection volumes should be considered;
- Depot should be offered in any community with staffed garbage drop-off; 10+
- “Willing partner” language should be removed;
- Population of communities should not be a relevant factor;
- Consider proximity to other recycling services and the benefits of “one stop shops”;
- Inclusion of grocery store requirement is a barrier and should be removed; and
- Program should provide comprehensive service to all communities in BC that request it.

Non-Depot Collection:

- Mobile depots should not be considered as an alternative to permanent depots; 2-4
- Work to collect flexible plastics and foam at the curbside; and
- Work with retailers to fill in gaps through return-to-retail model in underserved communities.

4.3.6 First Nations

First Nations Accessibility:

- All First Nations should be included without barriers, requirements or delays;
- Commitment should be included of how services will be expanded in a timely manner; and 5-9
- Concern that Integrated Recycle BC Collection Services eligibility criteria would exclude First Nations communities.

4.3.7 Streetscape Collection

General Streetscape:

- Invest in technology to support a more efficient collection system and to manage contamination;
- Disagreement that streetscape material has high contamination, high greenhouse gas intensity and poor environmental outcomes; 2-4
- Streetscape can be done well, and communities have already demonstrated this;
- Contamination and recycling rate requirements must be achievable;
- Provide fair compensation that covers full cost of delivering streetscape collection; and
- Advance on a clear and permanent offering to local governments to offset costs.

4.3.8 Financial Incentive Methodology

Incentive Rates:

- Concern that collection costs are not fairly covered and collectors are subsidizing Recycle BC;
- Pay the full cost of all collection services and prove compensation is covering all costs; and 10+
- Excluding costs of depots that do not meet Integrated Recycle BC Collection Services eligibility criteria is not fair and would not allow cost recovery for applicable depots.

Cost Study and Incentive Rate Recommendations:

- Consider implications of inflation and fuel price increases;
- Build annual Consumer Price Index adjustment into incentive rate structure;
- Further incentivize collectors to move to multi-stream collection model; and
- Consult with stakeholders on design of cost study.

2-4

4.4 Post Collection

Environmental Outcomes:

- Focus on environmental outcomes as a key outcome, including commitment to include material at the highest possible level of the pollution prevention hierarchy; and
- Include commitment to create reverse logistics system for end-of-life depot supplies (super sacks).

2-4

4.5 Dispute Resolution Power is not balanced between Recycle BC and other parties – needs fair process.

4.6 Communications

Promotion and Education Materials:

- Increase collaboration with local governments to leverage opportunities to achieve the same goals;
- Provide additional promotion and education materials on topics like contamination reduction and resources for communities with single-stream collection; and
- Increase materials available in other languages and targeted to a range of ages and geographic contexts.

5-9

Other Recommendations:

- Do not offload cost of contamination reduction strategies to local governments; and
- Work with producers to ensure accurate recycling labels on packaging.

2-4

5.1 Managing Environmental Impacts & 5.2 Pollution Prevention Hierarchy

Reduction of PPP:

- Push for reduction of PPP generated by producers, especially plastics;
- Eliminate unnecessary packaging types;
- Include targets and reporting commitments for a decrease in PPP, especially flexible plastics and foam; and
- Use fee structure and rates to incentivize reduction of PPP.

10+

Reuse:

- Use the Recycle BC supply chain to drive reuse of PPP;
- Fund reuse programs and education campaigns;
- Utilize producer fee structures to encourage reuse and provide incentives to producers to offer refill and reuse systems; and
- Include reuse targets by sector and report on amount reused and refilled annually.

10+

Energy Recovery:

- Concern about use of engineered fuel, which should be considered waste-to-energy; and
- Eliminate use of engineered fuel and other processes that result in destruction of material.

2-4

Disposal:	2-4
<ul style="list-style-type: none"> • Include targets to decrease amount of material disposed. 	
5.3.1 Program Recovery Rate	
Non-PPP:	10+
<ul style="list-style-type: none"> • Support for netting out non-PPP in recovery rate calculation; and • Concern of inclusion of non-PPP in historic recovery rates. 	
Methodology:	10+
<ul style="list-style-type: none"> • Support for use of aligned methodology for program recovery rate; • Report on both aligned and offset methodologies in annual report; and • Concern about timeline of provision of supply data and recommendation to explore opportunities to reduce time lag. 	
Targets:	5-9
<ul style="list-style-type: none"> • Increase targets to higher levels; • Estimate total amount of PPP sold in BC (including from exempt producers) and include in methodology for accurate representation of BC; and • Report on and establish recovery rate targets for each Regional District. 	
5.3.2 Material Category Performance Targets	
Methodology:	5-9
<ul style="list-style-type: none"> • Support for use of aligned methodology for material category performance; and • Confirm that non-PPP is excluded from methodology. 	
Targets:	10+
<ul style="list-style-type: none"> • Concern that targets are too low, especially for plastics; • Increase targets for plastics, especially flexible plastics; • Support for increasing target levels if targets achieved; and • Include explanation in annual report if targets are not and why, including explanation if any are above 100%. 	
Other	
Waste Composition Studies:	5-9
<ul style="list-style-type: none"> • Partner with local governments for waste composition studies and incorporate into program assessment; • Provide funding to local governments conducting studies, beyond partnerships with SABC; and • Report waste composition results on website and annual report. 	
Landfill Costs:	5-9
<ul style="list-style-type: none"> • Compensate local governments for cost of managing PPP in landfills. 	
Litter:	2-4
<ul style="list-style-type: none"> • Gather data on litter (including marine litter and brand audits); • Fund litter and beach cleanups; and • Report on cleanups funded and types of materials collected. 	

7. Recycle BC Responses

7.1 Approach and Process

The 2022 Consultation Report is the culmination of feedback gathered throughout the 2022 consultation process (collector conference, stakeholder workshops, and written feedback). Recycle BC has gathered and reviewed all the feedback provided. The following outlines Recycle BC's response to the most common themes and issues raised, with a focus on explaining the changes implemented to the post-consultation draft of the program plan in response to the feedback received.

7.2 Responses

Section 2. Extended Producer Responsibility Agency

2.2 Administration of the Program Plan

In response to the feedback received on this Section of the program plan, additional clarity was provided on Recycle BC's non-profit status and applicable incorporation. An explanation of Recycle BC's relationship to Circular Materials was added, as well as additional information on how local government representatives are appointed to Recycle BC's Advisory Committee. Finally, a commitment was added to report annually on the organizations and associations that Recycle BC participates in.

2.3 Producer Members and Definitions and Appendices A1 and A2

Given the feedback received on the lack of harmonization between Recycle BC's working producer definition and that applied in other provinces, Recycle BC completed a review of this issue with our legal counsel. Based on this process, we have concluded that further changes to harmonize Recycle BC's producer definition with other provinces and to tie the residency requirement to the national level are not possible without regulatory changes.

To delineate between the producer definition outlined in the Recycling Regulation and the definition used by Recycle BC for the purpose of producer membership agreements, the program plan now includes a separate Section 2.3.1 and Section 2.3.2 as well as a separate Appendix A.1 and A.2. Additional information was also provided on the contractual conditions for membership in Recycle BC, including residency in BC.

In response to feedback and questions received, additional information was provided on how Recycle BC engages with obligated producers that are not members in the program.

2.4 Program Financing

As outlined above, Recycle BC received feedback encouraging the program to leverage the producer fee structure to push producers away from harder to recycle and manage material, to drive packaging reductions and to encourage packaging reuse.

Additional language was added to the program to outline how fee setting methodology utilized by Recycle BC is harmonized across provinces, which includes substantial producer consultation. Links are also provided on the fee setting process for further information, given the level of complexity involved. Confirmation was also added that PPP that is not accepted for collection does not share in the commodity revenue generated by certain types of accepted material.

In addition, an explanation of how beverage containers included in Schedule 1 of the Recycling Regulation that are received through Recycle BC's collection system are managed was included.

Section 3. Packaging and Paper Product

3.2 Paper Product

Recycle BC recognizes the interest in having books accepted under the program's collection system. Books are not compatible to be recycled through existing processing infrastructure due to their construction, and are specifically excluded from Schedule 5 of the BC Recycling Regulation. As such, Recycle BC has neither the mandate, infrastructure, nor the funding to manage this material stream.

3.3 Single-Use Products and Packaging-Like Products

Recycle BC acknowledges that the reduction of single-use products should remain a primary goal. In our provincial campaign announcing the acceptance of certain types of single-use products in the collection system effective January 1, 2023, care was taken to encourage the reuse of applicable materials before they are considered for recycling.

In response to questions and feedback received, clarification was added to the program plan as to how Federal bans on certain types of single-use plastics are expected to impact the program.

3.4 Sources of Packaging and Paper Product

Recycle BC recognizes the interest in having the program accept and manage material from the ICI sector, including schools. As Schedule 5 of the BC Recycling Regulation is specific to residential sources of PPP and excludes ICI sources, Recycle BC has neither the mandate nor the funding to manage this material stream.

In 2023, Recycle BC will be developing a teacher resource guide, for primary and intermediate age students, that aligns with the BC teaching curriculum focused on packaging and paper recycling. Each guide will include curriculum-linked activities connecting to current Recycle BC resources that can be implemented in BC teaching communities.

Section 4. Program Design

4.3.2 Accepted Materials

As noted in the program plan, Recycle BC intends to follow the guidance of the Organic Matter Recycling Regulation of BC (OMRR) once the applicable amendments have been finalized. This will ensure that any categories of PPP directed to organic waste collection programs can be adequately recovered and composted. Compostable plastics are considered a contaminant in residential organic waste and are not expected to be permitted under OMRR. As they are also a contaminant in the plastic stream managed for recycling by Recycle BC, additional clarity was added to the program plan to confirm that Recycle BC does not intend to include or promote the addition of compostable plastics in either collection stream.

As such, Recycle BC is not intending to include or promote the addition of compostable plastics in either collection stream.

While the amount of PPP types not currently accepted for collection (not accepted PPP) remains small, these materials are generally problematic contaminants in the collection stream that can impact the marketability and recyclability of accepted materials. As such, and consistent with a results-based service provider model, Recycle BC will continue to include not accepted PPP in the contamination thresholds applied to all collection service providers.

4.3.3 Curbside Collection and Appendix B

For the curbside eligibility criteria for equivalent unincorporated areas (“equivalency criteria”) outlined in Appendix C, Recycle BC considered the questions and feedback received about interior communities accessed by ferries. Given the short duration and on-demand nature of some of these ferries that provide a level of access not common to most ferry-accessed locations, an exception was added to Appendix C to confirm the eligibility (if all other criteria is met) of these locations.

Given the questions raised on the minimum kg per household per year threshold that a curbside collection program must achieve before Recycle BC will consider a request to directly operate curbside collection, Recycle BC reviewed the average kg per household data of all curbside collection programs in the program. This threshold was intended to ensure that only reasonably well performing curbside collection programs with obvious support from residents (as demonstrated through their participation) would be eligible for direct operation by Recycle BC.

As a result of this review, the threshold has been lowered to 70 kg per household per year. To balance this change, Recycle BC also added a requirement that curbside programs must include a minimum of 2,000 households in the service area to be eligible for a transition request. This 2,000 household threshold roughly corresponds with a population of 5,000, which is the population threshold included in the curbside eligibility criteria for new communities, providing consistency across eligibility criteria. All but a handful of curbside collection programs with more than 2,000 households are currently achieving this 70 kg per household per year threshold, with the few exceptions generally being very newly established programs that are expected to see participation increase as residents adjust to the new service.

4.3.4 Multi-Family Collection

Recycle BC recognizes the interest from stakeholders and importance of increasing multi-family household participation in the program. In support of this goal and in response to the feedback received, a commitment has been added to the program plan to create and engage a multi-family collection stakeholder working group in 2024 to identify barriers to increased participation by multi-family contractors and households as well as opportunities and actions to reduce those barriers and increase participation levels.

4.3.5 Integrated Recycle BC Collection Services & Appendix C

This section of the program plan elicited strong feedback, which Recycle BC has considered seriously. Many of the concerns centered on the future of depots currently included in the program in communities that do not meet the community eligibility criteria outlined in Appendix C. A number of suggestions were provided for Recycle BC to consider as additional criteria, including considering historic collection volumes in applicable communities. To better confirm Recycle BC’s intent to continue with existing collection

partnerships in communities that do not meet the eligibility criteria but that have provided significant contributions to the program's collection volumes and recovery rate to date, Recycle BC added the following language to the program plan:

The Municipalities 50,000 Population criteria in Appendix C was also adjusted to a population threshold

Local governments that have historically provided depot collection services under the Recycle BC program in communities that do not meet the eligibility criteria outlined in Appendix C will be eligible to continue to provide collection service under the program in these communities, provided the applicable depot collected a minimum of 20 tonnes of PPP in 2022 and the local government's services continues to meet all standard Recycle BC program requirements.

of 35,000, which ensures that the City of West Kelowna is captured in that category.

Finally, additional clarity was added to confirm that Recycle BC will permit local governments to establish and operate satellite depots in communities that do not meet the eligibility criteria outlined in Appendix C or the exception noted above, subject to Recycle BC review and approval, which will not be unreasonably withheld, and that Recycle BC's standard depot incentive rate would apply in this scenario.

4.3.6 First Nations Collection

In response to the feedback received, Recycle BC included a more explicit commitment to collaboration and reconciliation with First Nations across BC. To provide better clarity on Recycle BC's intent to continue increasing the level of First Nations community participation in the program, a commitment was added to provide offers to a minimum of five First Nations per year to join the Recycle BC program.

While it was not Recycle BC's original intent to apply the eligibility criteria outlined in Appendix B and C of the program plan to First Nations communities this has been explicitly confirmed in the updated draft of the program plan to eliminate this concern.

4.3.7 Streetscape Collection

Additional details have been added to the program plan to contextualize the community eligibility criteria for streetscape collection.

While Recycle BC appreciates the enthusiasm of many program stakeholders to move forward with streetscape collection, it's important that Recycle BC get the details right to ensure that this collection stream is as efficient, effective, and environmentally beneficial as possible. The program plan outlines a path forward that Recycle BC believes will provide an achievable model for eligible local governments.

4.3.8 Financial Incentive Methodology

In response to the feedback received on Recycle BC's approach to establishing the financial incentive rates paid to collectors participating in the program, a number of changes have been made to the program plan. A commitment was added to engage directly with collection stakeholders, including applicable association

and organizations representing collectors, in the design and implementation of collection cost studies to gather feedback and build confidence in each stage of the cost study process. Confirmation that mid-term triggers for financial incentive rate adjustments will be applied to new and renewed collection service agreements following the completion of the next collection cost study was also added. Both changes reflect feedback received during the consultation process.

Additional detail was also added to contextualize the purpose of the financial incentives paid to collectors and their need to drive efficiencies and the application of operational best practices.

Recycle BC's objective is to set fair and reasonable financial incentives applicable to all categories of accepted PPP that incentivize participation in the program to the levels necessary for Recycle BC to meet its targets and to drive efficiencies and the application of operational best practices.

4.4 Post Collection

To reflect feedback received on this section of the program plan, a key outcome to focus on environmental performance and the management of material as high as possible in the pollution prevention hierarchy was added. A commitment to ensure the appropriate management of supplies used for post-collection services at the end of their life was also included.

4.6 Communications

Stakeholder feedback on this section was incorporated with commitments to collaborate with program stakeholders to ensure communication activities reflect their needs and to develop resident education campaigns and resources that reflect the diversity of BC.

Section 5. Program Performance

5.1 Managing Environmental Impacts & 5.2 Pollution Prevention Hierarchy

Recycle BC appreciates and shares the interest of many program stakeholders in improving the design, recyclability and environmental impact of PPP put into the market in BC as well as the desire to move material up the pollution prevention hierarchy. Many of the suggestions provided as part of this consultation process exceed Recycle BC's capacity or mandate.

Given the small market size of BC compared to the reach of regional, national and international producers, Recycle BC believes it can best influence PPP design by actively applying its time, resources and expertise to organizations and initiatives such as the Canada Plastics Pact that are focused on national harmonization and standards. As additional Canadian provinces begin implementing full EPR programs for PPP, Recycle BC will work closely with these other programs to build synergies and collaborate on national approaches to sustainable PPP design.

5.3.1 Program Recovery Rate & Material Category Performance Targets & Appendix D

In response to the general support during the consultation process for inclusion of the aligned approach to calculating the program recovery rate and material category recovery rates, Recycle BC will include the aligned methodology results in annual reports for interest and comparison purposes moving forward. To maintain consistency with historic program and material category recovery rate reporting and to ensure


the most recent collection year is used for regulatory reporting requirements, Recycle BC will maintain the offset methodology as the primary reporting methodology for all regulatory and official reporting.

Recycle BC recognizes the feedback and interest in having the targets increased, in particular for plastics. After reviewing the targets imposed in other provinces and considering an ambitious yet feasible approach, Recycle BC has increased the recovery rate target for rigid plastics to 75% by 2027 and for flexible plastics to 50% by 2027.

Appendix 1: Written Responses

December 21st, 2022


RecycleBC
405-221 West Esplanade
North Vancouver, BC
V7M 3J3


Thank you for the opportunity to provide comments on the draft Recycle BC Stewardship Plan 2023-2027. While we generally support the proposed plan, we would like to offer the following comments.

Offset vs Aligned Methodology for Overall Program Recovery Reporting

We understand that RecycleBC is proposing to keep the offset methodology to report on overall program recovery, while switching to the aligned methodology to report on material-specific performance. We do not support the use of two different methodologies, given the high potential for confusion and the introduction of additional complexity. Moreover, it will not allow for an “apples to apples” comparison between overall program performance and material-specific performance. As such, we strongly recommend moving to the aligned methodology for both program and material-specific performance reporting. While the disadvantage is that numbers will only be available in the annual report looking two years retrospectively, this is not something that stakeholders are unfamiliar with. For example, Ontario has historically reported performance with a two-year lag (e.g., 2021 performance based on 2019 data).

Recovery Performances that Exceed 100%

Section 5.3.2 of the proposed plan provides an overview of the material recovery performances achieved over the last five years. In 2021, the reported performance for paper and glass are greater than 100% (101% and 116% respectively). The plan should provide an explanation of why that is, including stating whether factors other than the use of the off-set methodology may be at play (particularly in the case of glass).

Follow us on **LinkedIn** for news and information about carton recycling and our activities.

Make Available the Excel-Based model Used by RecycleBC to Set Fees

In the spirit of transparency, performance tracking, and continuous improvement, we strongly encourage RecycleBC to make available the excel-based model that it uses to set annual fees. This is the practice in place in Quebec (Éco Entreprises Québec) and Manitoba (Multi-Material Stewardship Manitoba) as well as in Ontario until 2021, when Stewardship Ontario retired the fee-setting process in the context of its wind-down. This would allow Carton Council to access the following information: tonnes of cartons supplied by your members, tonnes of cartons recovered through your system, and the carton recovery rate.

Impact of Non-PPP on the Program Recovery Rate

We are somewhat surprised that performance reporting to date has been inclusive of any non-packaging and paper product (PPP) collected within the program. We strongly support moving to an approach whereby the program recovery targets, and associated reporting, be net of non-PPP. We recommend that this be effective in the 2022 reporting year. It would also be helpful to clarify the language in the proposed plan to remove any confusion. The proposed plan's text currently reads "The level of non-PPP averages <our emphasis> to 5% of the program recovery rate each year." However, during the webinar held for association members (November 22nd) it was stated that the actual measured contamination rate was 5%. The text should be revised accordingly.

Thank you for this opportunity to submit comments on the draft Recycle BC Stewardship Plan 2023-2027. We look forward to our continued collaboration.

Best regards,



Isabelle Faucher
Managing Director, Carton Council of Canada



Consultation for Recycle B.C.

As members of CCLAP(Climate Crisis Langley Action Partners) we are submitting a few ideas regarding Recycle B.C. PPP plans for 2022.

We respect Recycle B.C.'s comprehensive and transparent work and are pleased that it has joined the Canada Plastics Pact in its effort to create a circular economy.

After reading the extensive PPP plan, we are pleased to submit our feedback as follows:

- Despite extensive educational materials and the development of the recycle help line, there appears to be a great deal of confusion as to “what goes where”. With an increase in the variety and amount of packaging, it has become challenging to sort and deposit items correctly.

Possibilities:

- a barcode on the products/packaging that can be scanned with a cell phone.
- an identification App available for devices.
- Recycle B.C. Representatives' attendance at conferences dealing with plastic pollution, the circular economy, and innovations for waste management.

Eg. COP 15, Metro Vancouver Zero Waste conference.

- An increased collection mandate to include tourism, institutions and other commercial ventures.
- Increased subsidies to innovators creating more sustainable packaging regardless of their affiliation with Recycle B.C and its stewards. For example: scholarships or contests for youth with innovative ideas for sustainable packaging.
- Increased incentives for EPR to develop new sustainable and affordable PPPs.

We recognize that without Recycle B.C. we would have a disastrous pollution problem but as you are aware, recycling alone cannot be the solution. As members of an environmental group, it is our hope that Recycle B.C. or Recycle B.C. in partnership with an organization could address the **Reduce, Reuse** R's of the circular economy in the same efficient way.

Sincerely,
Ann Wright
Antoinette Guillou



December 22nd, 2022
Alex Lidstone

climatecaucus.ca

We would like to thank you for the opportunity to provide feedback on the draft new Packaging and Paper Product Extended Producer Responsibility Plan (the “draft plan”). Climate Caucus is a non-partisan network of over 600 local elected climate leaders from every province and territory and over 250 members in B.C., who are driving system change to transform our communities in ten years. Collectively, we create and implement socially just policy which aligns with the Intergovernmental Panel on Climate Change (IPCC), Intergovernmental Science Policy-Platform on Biodiversity and Ecosystems Services (IPBES) science, and the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP).

Properly functioning Zero Waste and Circular Economy programs are critical for local governments who are tasked with managing product end of life. Canadian local governments are often under a lot of pressure to take action in addressing the waste crisis, since solid waste management is partially a local government responsibility. Local politicians are faced with tough decisions around landfilling, incineration, and costly export of waste. Thus, we are excited about the draft plan and its potential to both reduce upstream waste and better serve communities across BC.

Climate Caucus would like to see several important aspects included in the program:

- The program needs to set high targets for **reduction and reuse**, develop actions to achieve them and provide funding.
- The program must have a plan to provide comprehensive service to **all communities** in BC who request it, including First Nation and rural communities. The program must provide service to all multifamily buildings.
- The program should **pay the full costs** of providing these services and not continue to download them to communities and the environment.
- Fees need to be set to drive a **decrease in plastic** use.

Once again, thank you for the opportunity to provide feedback. We look forward to seeing the final plan.



IZWTAG

INDIGENOUS ZERO WASTE
TECHNICAL ADVISORY GROUP

Board Chair
Recycle BC
405-221 West Esplanade
North Vancouver, BC
V7M 3J3

December 28, 2022

Re: Recycle BC Packaging and Paper Product Extended Producer
Responsibility Plan - Consultation Draft September 29, 2022

The Indigenous Zero Waste Technical Advisory Group (IZWTAG) would like to offer some high-level comments on the above document. IZWTAG's mission is to assist all 202 First Nations within the province of B.C. to implement waste management systems based on the zero waste philosophy, working in partnership with government, product stewards and other service providers (see izwtag.com).

First Nations have lived and thrived on the lands and waters sustainably. Today, however, it is necessary to participate in circular economy systems if First Nations are to continue the culture and tradition of taking care of the land and water. In that context, it is essential that each of the 202 First Nations is included in province-wide recycling systems in actuality, without barriers, extra requirements or delays. To that end, IZWTAG expects any extended producer responsibility plan to provide meaningful commitments to rapidly extend services to indigenous nations across the province.

The Recycle BC consultation draft is an opportunity to build on the nascent and promising efforts by the staff to engage with indigenous representatives with the intention of achieving entry into the recycling system. These efforts are appreciated and encouraged, nonetheless, IZWTAG is yet to see rapid and significant progress in actual uptake of First Nations as collectors. For the section in the draft devoted to First Nations Collection to be meaningful, there needs to be supporting evidence that these initiatives will expand services to every indigenous community in a timely manner.

Of serious concern in this consultation draft is the introduction of service provision constraints/denial to communities based on size as one of the primary determinants. IZWTAG notes that these criteria could be applicable to First Nations, and therefore potentially shut out some, if not the majority, of First Nations in B.C. If that is the case, IZWTAG categorically objects to this consultation draft.



IZWTAG

INDIGENOUS ZERO WASTE
TECHNICAL ADVISORY GROUP

On behalf of the Board of IZWTAG Directors, I would like to extend an invitation to you and the Recycle BC Directors to meet in person and begin a dialogue in the spirit of relationship and reconciliation. We note and acknowledge here the Truth and Reconciliation efforts and commitment demonstrated by our Provincial government through legislative declaration to recognize/affirm UNDRIP. For First Nations, this commitment to a 'New Beginning' signals a systemic shift away from marginalization of our communities and requires positive and accountable performance by Recycle BC and other Stewardships.

Lucinda Phillips, the IZWTAG Executive Director, can be reached at 604-902-9440 for arrangements.

Thank you for the attention to this letter.

Yours Truly,

Calvin Jameson
President

Cc:
Honorable George Heyman
Minister of Environment and Climate Change Strategy and
Minister Responsible for Translink
Government of British Columbia

Laurel Nash
Assistant Deputy Minister
Ministry of Environment and Climate Change Strategy
Environmental Protection Division
Government of British Columbia

Allyson Rowe
Regional Director General
Indigenous Services Canada, British Columbia Region

Averil Lamont
Director, Community Infrastructure
Indigenous Services Canada, British Columbia Region



Recycle BC Written Consultation Comment– Mind Your Plastic

Mind Your Plastic would like to thank Recycle BC for the opportunity to comment on the new Packaging and Paper Product Extended Producer Responsibility Plan Consultation Draft (the Plan). The Plan is a great example of what is possible when provincial governments assign the responsibility and costs of end-of-life material management to producers that manufacture and sell packaging and paper products. It is a comprehensive overview of the responsibilities of the organization and the relevant producers, as well as the services offered within the existing EPR framework. As a part of the consultation process for the Plan, Mind Your Plastic has developed this written comment with suggestions and feedback on potential areas for improvement or clarity. Our comments have been divided below into three specific topics: defining diversion and recovery, setting targets, and the viability of reusable collection.

Defining diversion and recovery rate

Recognizing that the pollution prevention hierarchy is mentioned briefly in the EPR Plan (pages 23-24), we suggest that the waste hierarchy be more fully incorporated in the EPR Plan's context and design. As suggested by the [Canadian Council of Environment Ministers](#), EPR programs should define the diversion rate objectives in accordance with the waste management hierarchy, so that waste activities are prioritized in the following order: repair and reuse, remanufacture and refurbish, and then recycling. While recycling is a key component of all EPR programs to ensure that materials and packaging are sufficiently collected at end-of-life, recycling does not inherently encourage a shift away from the take-make-waste economy. By shifting the objective of EPR from the promotion of recycling to its use as a tool for establishing a circular economy, the program would have a greater chance of reducing packaging and plastic pollution overall.

Including the waste hierarchy in the definition of the program's waste management priorities will also make the formal inclusion of reuse and refill targets far easier. It is possible and recommended that EPR plans prioritize source reduction and reuse above recycling in diversion activities. Upstream has produced [several fact sheets](#) that outline the importance of retooling EPR for the purposes of establishing a truly circular economy. Primarily, EPR programs have the potential to be a great source of funding for building the infrastructure required to implement reusable and refillable systems at scale, but also have potential to create jobs and resilient local supply chains. However, this ambitious application of EPR can only be realized through recognizing the importance and opportunity of formally including waste reduction and reusability in the program's targets.

Target setting

Target setting is an important tool in shaping the desired outcomes and pathways for an EPR program. Expanding the scope of collection rates and targets established in the EPR Plan can broaden the success of waste and pollution prevention in the province. Most significantly, targets could be established to track the overall reduction of packaging in BC. After creating a baseline, overall packaging reduction could be measured year-over-year to compare the progress in reducing the amount of packaging ending up in the system as waste or in the environment as pollution. This is beneficial, as it would demonstrate whether packaging design changes are being implemented to eliminate problematic or unnecessary components. It could also offer a new funding stream through eco-modulated fees based on ecological outcomes such as producers using less packaging or transitioning to reuse. We have seen [France adopt a similar modulation strategy](#) for packaging within their EPR system to encourage producers to adopt more circular packaging designs.

Related to reusable and refillable packaging, the EPR Plan could also set targets that specify how much packaging must be reusable or refillable by each covered sector. Similar to performance targets for recycling and materials, a target outlining a desired objective for reusable packaging per sector would signal to manufacturers and suppliers that Recycle BC is committed to supporting reusable and refillable initiatives. This can be essential to encouraging producers to take a leap and embrace these innovative solutions. With a formal target, producers could then switch to reusable or refillable packaging as a way to fulfill their EPR obligations and create less waste.

Further, there are no explicit statements in the EPR Plan that define what recycling entails for the purposes of EPR. Recycling and recovery targets should not include landfill disposal, incineration, energy recovery or energy generation by means of combustion, or energy to fuel. To be considered as recycled material, the recycled plastic resin or packaging should be verified as a feedstock for new plastic products. Using recycled resins as a feedstock for new products also contributes to recycled content requirements. It could be specified that recycling rates are calculated using the amount of material actually processed and sent to end markets (and not just the amount collected) to ensure participants in the program that the collected material is being re-processed as feedstock for other products.

Viability of the collection of reusable materials

With the introduction of a new EPR Plan, there is an opportunity to incorporate reusable and refillable packaging into the EPR system. Many municipalities and provincial or state-level governments are looking to understand how they can adopt a circular economy through the implementation of reusable and refillable networks. An idea that has been suggested in many of these conversations is curbside collection for reusable packaging. Curbside collection would reduce the burden on consumers having to return

their reusable packaging to retailers, and also make certain that all reusables are processed and sanitized in the same manner. Whether the reusables are sorted into their own bin for collection or collected as a part of the recycling process, there are many options to innovate existing waste management infrastructure and modify it to work for reusables.

In the City of Durham, North Carolina, an organization called [Don't Waste Durham](#) has taken on the challenge of figuring out the logistics of including reusable packaging collection in local curbside recycling through the [ReCirculation Project](#). The project aims to test whether the recycling industry's existing infrastructure can be adapted to recover and redistribute reusable packaging and materials. Phase 1 of the project began in 2019, when they partnered with the City of Durham Solid Waste Management Department, a local recycler, and several wireless technology companies. Through the collection pilot, they found that reusable containers with RFID tags that were placed into residential recycling bins for curbside pickup could be collected by recyclers, arrive at the sorting facility, and then be tracked, sorted, and ultimately recovered. Following Phase 1, studies were conducted to prove that there is a profitable reusable supply chain for local businesses, which outlined the cost savings associated with going reusable, and the optimal sanitization procedures.

The creation of a localized network and supply chain, supports a circular exchange of materials that starts with curbside collection. The only way to innovate successful programs such as this is to secure investment and have organizations willing to be leaders in the space. BC is a progressive province, with an effective, streamlined EPR program managed by Recycle BC. With the well-established collection and recycling success of BC's EPR, it is an opportunity to phase into more circular programming that prioritizes waste management practices and enables higher resource efficiency (reduction, reuse, repair, etc.). With other North American cities making similar commitments, it is valuable to be a part of the early movers, and create the standards for new systems, such as curbside collection for reusables.

Overall, the EPR Plan is a great example of an EPR program that is currently meeting and exceeding performance targets for paper and packaging products. However, there are opportunities to improve the Plan to maximize its impact on waste collection and reduction. A more detailed definition and explanation of diversion and recovery rates may be beneficial. It is particularly useful to describe diversion in reference to the waste hierarchy and how waste management pathways are prioritized based on the ability to recover the highest value of the collected material. An expansion of target setting would also demonstrate the progress being made to reduce paper and packaging waste through EPR programming. This may include setting overall waste reduction goals, and packaging collection targets specific to particular sectors for an additional breakdown of producer accountability.

The potential to include reusable and refillable collection within the EPR program should also be considered. As demonstrated by the City of Durham, geographies with effective recycling processes are excellent candidates to pilot curbside reusable collection. This is particularly relevant to BC, which is the home to many of Canada's most successful reusable service companies (e.g. ShareWares, Reusables.com, etc.) that would provide an adequate volume of reusable packaging for a collection pilot in the Metro Vancouver area. There is a fantastic opportunity to collaborate and innovate to create more circular packaging waste management, and make BC a leader in this important space.

Once again, Mind Your Plastic would like to thank Recycle BC for the chance to participate in the consultation and feedback process. BC is an exemplary case of Canadian EPR working to change the conversation around packaging waste and reduce the amount of plastic and packaging entering our environment. With the addition of the suggestions put forward in this response, Mind Your Plastic believes that Recycle BC's EPR plan for paper and packaging could be even more impactful in embracing a fully circular economy that prioritizes waste solutions beyond recycling.

Sincerely,

Mind Your Plastic



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Written feedback to Recycle BC (at consultation@recyclebc.ca) 2022 Program Plan from Nanaimo Recycling Exchange. Submitted January 6 by deadline extension request granted by [REDACTED] on December 22, 2022.

Preamble: Although somewhat critical of the proposed plan, this feedback is meant to draw attention to the direction RecycleBC (RBC) seems to have taken. Nanaimo Recycling Exchange appreciated the program from the depot operator perspective, and appreciates the complexities of balancing environmental and industry priorities in general, and the specific challenges brought with an unwieldy range of stakeholders.

That being said, the framework for the program is EPR, which has an established framework for pollution prevention that seems to take a back seat to industry priorities. It is not clear in this plan and recent annual reports if stakeholders share the baseline set of environmental principles that govern EPR. It is becoming difficult to recognize RBC as an EPR program beyond a fee system for collection and recycling where possible. At crossroads where there is no available technology for effectively recycling materials, RBC should apply EPR principles to remove or redesign such materials. Instead, RBC enables BAU production by frantically attempting to innovate technology to accommodate poor design. This is the opposite response to the mandate EPR gives to PRO's.

"Annual increases in the materials accepted" undermines the purpose of the EPR, and downgrades RBC as an environmental program.

What happens when the volumes of problematic, underperforming, barely collectible, non-recyclable materials tip the balance of the financial efficiency model and drive management of materials down the hierarchy? Product design will follow management of materials downward through the hierarchy without penalty. This will feed the plastic pollution crisis. What happens to public trust, then? What happens to recovery rates of light-weighted depot only materials? What happens to recycler and consumer behaviour? We know the answers to these questions because we see the results from the flexible "pilot."

Nanaimo Recycling Exchange Society sincerely hopes RecycleBC (RBC) can navigate opposing pressures and uphold previously demonstrated program integrity.

1. Program Plan Context

Page 1 of the plan highlights achievement of Full transparency. It is not clear that RBC has achieved "Full transparency in how collected PPP is responsibly [sic] recycled and managed, subject to third party verification." It looks, from the outside, that industry obligations have robbed RBC of the ability to be fully transparent. That being said, increased transparency could be the path to increased success and especially to increased public trust.

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Full transparency would mean stakeholders know that EMA definition of “recycling” allows RBC to report shredding increasing amounts of plastic for use as alternative fuel at cement kilns as recycling. Subsequent to this:

- transparency would mean stakeholders would know the effluent from cement kilns is safe (typically less scrubbing capacity than incinerators. No data or third party verification provided.
- that Material Recovery at cement kilns addresses environmental impact better than landfill. No data reported.
- that RBC would have reported all attempts to manage this plastic according to the hierarchy, with costs and results of attempts to manage flexible plastic by Reduce, Reuse, Recycle (the real recycling) before selling the shredded product to cement kilns.
- transparency would mean the public knows which definition of Recovery is intended when RBC uses Recovery for alternative fuel at cement kilns, as defined on the pollution Prevention Hierarchy and on RBC website, interchangeably with Recovery as Collection.
- transparency would ensure stakeholders know and understands the obligation to industry by collaboration with CPP, whose mandate it is to increase value of non-recyclable plastic, even if value is revenue from cement kilns.

Transparency would mean stakeholders understand the extent and implications of RBC partnership with CPP’s targets, obfuscated by clever use of definitions, to design plastic packaging to be Reusable or Recyclable or Compostable. Target achieved. “Flexible” plastic is already being designed to be Recyclable by EMA definition: the kind of recyclable that happens at cement kilns.

Transparency would mean stakeholders understand that RBC has signed on with CPP’s targets to ensure that 50% of plastic packaging is recycled or composted. Target achieved: “Flexible” plastic is already being designed to be Recyclable by EMA definition: the kind of recyclable that happens at cement kilns.

Transparency would mean stakeholders understand that Golden Design rules to keep problematic plastic in the economy, as though that keeps it out of the environment, are in fundamental conflict with EPR principles to design such plastic out of the system.

Transparency would also mean that Producers understand and pay true costs for reducing the environmental impact of their products according to the Pollution Prevention Hierarchy. There is a clear global imperative to Reduce production of plastic, yet there appears to be no communication to Producers to do so.

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It sounds appropriate that RBC will batten down the hatches to face weather events, but why refuse to address the root cause of climate events which is consumption emissions from production?

The context from the outside looks like, after 8 years, RBC has not yet reported how the program has reduced the environmental impact or reduced production of packaging, especially plastic which has the designation of Toxic in Canada. RBC adds more problematic plastic to the program.

Isn't the context that EPR principles are diametrically opposed to industry profit and efficiency drivers and PRO's are in an impossible position? EPR programs appear to be getting dragged deeper and deeper into industry led "value" practices such as using plastic as fuel and calling it Recycling, or hiding plastic in cement and calling it Reuse.

Transparency would mean stakeholders understand the full implications of industry obligation.

- "Recycle BC will continue to leverage its position to further its producer members' plastics recycling objectives."
- When producers take full responsibility for their materials, they are in a better position to recover them as inputs into new manufacturing processes and capture the maximum value from these resources."

2. EPR Agency

2.1. Regulatory Context—Addition of Single Use Products and Packaging-Like Products to the program.

Note to MOECCS: It is not at all clear why products destined for bans (straws, stir sticks, utensils, plates, bowls and cups) by provincial and federal governments are being managed instead through Recycling Regulations. Public feedback strongly supported bans, especially of these particular single use products. That being said, Government of BC joining with Canada Plastics Pact in 2021 explains the folly of keeping SUPs in some non-existent Circular Economy for plastic. End of Note.

It is less clear why RBC would add more underperforming and uncollectable products to the program in absence of reported ability to reduce environmental impact of existing underperforming products. Even more puzzling is the absence of targets or projections of how these new uncollectable and underperforming products, especially products such as contaminated LDPE drop sheets, ancillary products like mascara brushes, utensils and straws, will be managed according to the Pollution Prevention Hierarchy in the new plan.

- Federal and Provincial governments recommended bans for these materials

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- Ellen McArthur Foundation (and CPP) principle target is to “define a list of plastic packaging that is to be designated as problematic or unnecessary and take measures to eliminate them”, and further reports that without elimination, no targets will be met.
- Ellen McArthur Foundation recommends plastic flexibles smaller than 50mm x 50mm be eliminated.
- Ellen McArthur Foundation recommends single use flexible plastics be eliminated.
- RBC says put it all in the Blue Bin. The rest of the world can’t recycle this stuff, but we can? Whatever Merlin’s proprietary end fate is...it’s not us.

Public trust will not follow this inclination.

Approval of Plan with Addition of Single Use Products and Packaging-Like Products to the program. The Ministry should not approve this plan as is.

The new products added by OIC 370 are different enough from current accepted products such that the proposed plan does not sufficiently satisfy sections 5(1) (a) (A) requirements for plan approval. Specifically,

- the plan does not meet criteria demonstrating that a 75% recovery rate can be achieved. If RBC is counting on the proposed plan for this purpose, it falls short.
- The plan doesn’t provide performance measures and targets for new materials that satisfy plan approval requirements.,
- The plan does not reveal how new products will be managed on the Pollution Prevention Hierarchy, and so there is no way to assess or approve the plan’s ability to reduce environmental impact.
- RBC notes that evolving materials places a burden on the public and businesses, which “can hamper recycling efforts and lead to plastic packaging ending up in the landfill or the environment.” Yet, the plan does not reveal a satisfactory education strategy for the public, depot operators, or collectors to manage the materials.
- There has been no public consultation on a plan for collection and management of new materials.
- LDPE as a category has been downgraded to Flexible without a) third-party evaluation of the footprint from the pelletizing project to verify correct management of environmental impact, and that b) violates regulation to reduce environmental impact.

2.4 Program Financing

Producers pay fees “that are sufficient, in aggregate” to deliver the plan. Yet, the plan states “material management costs allocated to each material should reflect the material’s impacts on the costs to collect and manage it in the recycling system because a material’s unique characteristics can drive costs in distinctive ways.” There is question of whether any measure of aggregate fees is sufficient to deliver the plan in accordance with obligations to manage each material in descending order of the hierarchy. Fee reductions each year since 2020, for material

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managed at the Material Recovery level are evidence that sufficient fees are not charged or applied to manage that material at a higher level of the hierarchy.

Material management costs “expressed net of commodity revenue” is contradictory to the principles of EPR. Example: Flexible plastic has commodity revenue from cement kilns. If this revenue is used to calculate material management costs to producers, then it offsets fees charged to producers. That means producers pay a reduced fees for flexible packaging, which incentivizes increased production of flexible packaging, and perpetual management of the material at Material Recovery level. The commodity revenue benefit should be applied only to higher levels of management, especially to Reduce and Reuse to offset loss of sale revenue for producers.

Longitudinal examination of RBC fee schedule history highlights disturbing trends to incentivize continued production of underperforming and problematic plastics, while disincentivizing production of glass and metal. Fees for Laminates and Other (whatever those are) plastics have been reduced every year since 2020 (without corollary reduction in environmental impact) while fees for glass and metal have increased.

Conversely, fees for LDPE have increased since 2020 (possibly representing costs of mechanical recycling) while producer fees for flexible plastic have been reduced, (likely as a benefit from commodity revenue). Incentives provided to RBC’s post-collection partner “to further process system residues to meet recovery end-market requirements for engineered fuel products” further disincentivize paying costs for mechanical recycling. Moreover, primary product such as flexible plastic is not a system residue, and so it’s difficult to understand how processing it for use as fuel can “minimize the amount of residue sent to landfill.”

The plan has no mention of fee setting to cover true costs of managing materials at the highest level of the hierarchy, and in descending order until management occurs. It is therefore difficult to assess how the principle, “The material management costs allocated to each material should reflect the material’s impacts on the costs to collect and manage it in the recycling system because a material’s unique characteristics can drive costs in distinctive ways” drives fee setting. Finding the most economical management level of the hierarchy should not drive fee setting.

There is no evidence that the key component of “adding cost to uncollectable and/or underperforming material categories to enable the investment in performance improvement” is being used effectively.

If the fee schedule were improving performance of underperforming and uncollectable materials, then by now the 2017 Flexible Plastics pilot would have resulted in prohibitively increased fees and removal of the product from the system, or some investment to drive

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material management from the top of the pollution prevention hierarchy; however, the pilot continues to manage more and more product at the Material Recovery level of the hierarchy, including previously recyclable LDPE to the category.

There is no evidence in the history of fee schedules that fee setting achieves more than “business as usual.” Moreover, current fee setting results in perhaps unintended consequences of undermining value and viability of mechanical recycling for LDPE.

There is no supportable rationale for a weight-based fee setting model within established EPR principles to set fees in order to reduce environmental impact. In fact, the heavier categories of metal and glass and fibres are higher performing, highly collectable, and less problematic in the environment than plastic, but fees for these categories have increased since 2019, thereby disproportionately disincentivizing production of highly recyclable packaging.

It is difficult to imagine this weight-based system having desirable outcomes with heavier reusable products.

Fee schedule categories should be aligned with YOY performance target categories of Managing Environmental Impacts (management of each material category at each level of the hierarchy) and resulting Program Performance. That way, rationale for fee-setting would be self-evident.

4. Program Design

4.1 Delivery Principles: The plan delivers a confusing collection of delivery principles that fail to align with the requirement to reduce environmental impacts of products throughout the product’s life cycle.

4.4 Post Collection

It is notable that RBC declares “marketing PPP to maximize commodity revenue” as a service. It reads as a single step that would automatically preclude or supersede marketing to ensure management according to the hierarchy in order to reduce the environmental impact of the products. There should be no expectation of commodity revenue when products are managed in descending order of preference through the hierarchy. Quite the opposite should occur: producer fees should be increased until they cover the true costs of management at the highest level, and if costs become prohibitive, materials are redesigned into products that can be managed at the highest level of the hierarchy. This would eliminate many plastics from the system. EPR 101.

It is difficult to understand the expectation from investing in recycling infrastructure when the problem is that plastic is increasingly not recyclable. No amount of “adaptability and resiliency” will change this fact. You can sort till the cows come home and it doesn’t make product desired by recycling, unless the plan requires the kind of recycling that happens at cement kilns.

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Priority given to local markets does not match priorities of the Recycling Regulations or EPR principles. It would be more appropriate to choose markets by end fate capacity to reduce environmental impact of the products. Typical measures of end fate capacity would be data showing upcycling prioritized over downcycling, re-manufacture with percentages of recycled content required to substitute for virgin content, or re-manufacture into reusable products.

Tracking to the point of receipt at end markets is insufficient to determine end fate of products: pelletizing and shredding is processing for end markets, and shouldn't be considered end market recycling. Increased transparency (and actual meaningful data about end fate of plastics) would be achieved with tracking past receipt at end markets. It is high on the list as criteria for public trust.

Note to MOECCS: Recycling Regulations should provide definitions of Recyclable, Recycling and Recycled for this purpose. The current EMA definition of Recyclable allows confusion between traditional mechanical recycling and "recycling" taking place at cement kilns, making it impossible to distinguish outcomes in any EPR program reporting to BC Ministry. End of Note.

4.6 Communications. Unfortunately, communication with the public focusses on awareness and collection success, rather than on outcomes. This is puzzling when the 2021 and 2022 Annual Reports noted that 96% of residents are aware of packaging and paper recycling in the community.

People interact with Nanaimo Recycling Exchange because of our history in the community: we hear first-hand how people interact with, and think about, waste and recycling and RBC's program. Outcomes are important to people.

It's unfortunate that RBC points to the media as the cause of low public trust. It's a shame that more importance isn't given to the downswing of public trust and strategies to regain trust. Media likely will continue reporting on plastic pollution that is not being managed by recycling no matter what RBC says. Something is wrong and people know it. Your name is Recycle BC and your website tells people how great engineered fuel is. That doesn't work. We hear people say, "Why bother?" For some, RBC is now seen as part of the plastic problem because the messaging sounds like justification with no strategies to reduce plastic on the planet.

Regardless of recycling rates, people now know the unavoidable impacts of human toxicity, aquatic ecotoxicity, aquatic eutrophication, global warming come with all plastic. RBC's achievements don't stand up: people remember that glass, metal and paper were all recycled before RBC started. People know plastic is the problem. People know RBC "burns" plastic to make fuel. But they don't know why. The annual report reads like a fairy tale against a backdrop of a plastic pollution crisis.

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Perhaps Recovery shortfalls aren't from low awareness. Perhaps a more open approach to constraints and limitations for managing plastics would help.

The reality is that plastic is increasingly not recyclable. PRO's can't make it recyclable except by expanding definitions and making compromises like downgrading LDPE to provide volumes necessary to process flexible plastic. If RBC could educate with more data about which materials aren't recyclable, and what that means for end fate, the public could once again feel like they can be part of the solution. Why does RBC not engage the public with proven strategies to Reduce the environmental impact of problematic materials: no research is needed for RBC to tell the public such products are not recyclable, or the recycling footprint is too large, or to stop purchasing toxic materials.

The 2021 Annual Report noted the percent of residents who recycle to preserve the land, oceans and environment is lower than the 2020 report which says BC survey respondents identify "helping to preserve the land, oceans and environment" as their primary motivator for wanting to recycle. That seems to be a significant turnaround. RBC seems to have lost the leverage to increase motivation to recycle by settling for alternative fuel for 6 years instead of eliminating the product in a global plastic pollution crisis.

2021 Annual Report highlights that 86% of collected material is managed by recycling. A "Get the Facts" poster in the Public Education section of the same report states "Over 90% of collected material is managed by Recycling." Public confidence depends on trustworthy reporting.

The plan states, "In keeping with its continuous improvement program, Recycle BC will employ the above strategies to target and improve any areas of material underperformance in the recycling system." Material underperformance cannot be corrected by communication when underperformance is a function of the material composition.

RBC's alliance with the plastic industry that touts massive increase to flexible plastic in coming years hasn't helped.

Alignment with CPP, and by extension PAC, complicates communication with the public and with producers. PAC webinar messaging (alarmingly called Education) to producers sounds like "Don't worry. There is a plastic pollution crisis everywhere but Canada. We recycle everything!"

CPP/PAC messaging to producers in such educational webinars as Golden Design Rules Essentials clarifies the intent behind removing problematic plastics as "not removing problematic plastics, but eliminating products that aren't used anymore." The webinar speaker also acknowledged that only 5% of lifecycle emissions are affected by recycling so don't worry if

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products aren't recyclable.

- This messaging is in conflict with EPR principles.
- This messaging contradicts research carried out by Material Economics for the Ellen McArthur Foundation that states, "producing stuff accounts for 45% of global CO₂e emissions. And that, in order to limit global warming to 1.5 degrees, we need to reduce consumption-based emissions by 50% by 2030 and by 80% by 2050. Furthermore, there is no current easily available technological change that can reduce these emissions."

Alignment with CPP gives RBC the role of dinner guest at the table looking for a way to tell the 5-Star chef how to cook.

For the public, consider what it has taken for an area with historical high recycling education and practices to get to this level of disillusionment. Is RBC going to manage an impossible message or help the public understand the truth?

5. Program Performance

5.1 Managing Environmental Impacts. EPR works to reduce environmental impact and to reduce amounts of materials going to market. This should be the perfect model, but for the most part EPR principles are passed over for industry priorities of keeping products in the economy. Increased influence and oversight of management according to the Pollution Prevention Hierarchy is needed.

"Plastic packaging comes in a wide range of materials and designs and is constantly evolving, which places a burden on residents, businesses and governments looking to understand which options are the most sustainable. This can hamper recycling efforts and lead to plastic packaging ending up in the landfill or the environment." Although mismanagement of packaging might be one factor that hampers recycling, the larger root problem is the burden placed on PRO's to manage non-recyclable plastic in some way that reduces environmental impact. There likely isn't a way.

The moment producers supply flexible packaging to the market, it is released into the environment as pollution. There are no sustainable options for residents, businesses and governments to choose.

As mentioned, Nanaimo Recycling Exchange has closed our depot gates, but still operates as a society. That means people in this area bring concerns to us with the hope we can affect change. People tell us what they believe and what they don't believe, and the truth about what hampers recycling efforts.

It is true that media reports about recycling have had an effect on confidence in recycling. Pictures of plastic pollution abound. But make no mistake about reaction to local practices of managing the plastic people deal with in their daily lives. It doesn't matter how many fine line

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distinctions RBC draws between burning, melting, pyrolysis, engineered fuel for energy or incineration for energy, it's not recycling for the environment, and people feel duped. The choice to recycle was taken away by "Recycle" BC so people started to make their own choices.

Many people believe it might be better for the environment to landfill toxic plastic than to produce unknown emissions from engineered fuel. And, given the volumes of flexible packaging, it is common household practice to store what you can for trips to the depot, but use curbside garbage pick up for overflow. It is also common to place all depot items in the garbage to save now expensive gas needed for transport to a depot.

Meanwhile RBC says to put more and more into the bin. The website says it's all flexible plastic so that must mean it's all getting burned. At the same time, there is a global plastic pollution crisis, and more and more keeps coming. People just don't believe it's possible to recycle these materials they have been told in the past are not recyclable, they can't keep up with the categories of plastic types, the crisis gets worse, and they don't believe they are being told the truth.

Some people listen, hear things, and read things about climate change and now they know terms like consumption emissions. These people think recycling will never solve the problem. They aren't wrong. Other people have hit the wall of flexible, crinkly, milk, soy milk, blister pak, vacuum seal, mylar, wrap for tea, coated, thin coat, compostable, biodegradable, I think it changed again, does it matter anymore? they burn it anyway. They should ban it all...I thought they were doing that.

There seems to be various categories of behaviour: people who recycle correctly at curbside because it's convenient and the bin is big. People who use garbage and recycling bins interchangeably for overflow. People who follow the depot and curbside rules.

There seems to be ONE category of belief: Almost no one believes 100% in recycling anymore, or that things are being recycled.

This is only going to get worse with addition of a confusing parade of products to the program in 2023. At the end of the day, RBC's management of flexible plastic, with continued expansion of accepted products in the category, has downgraded RBC's management of environmental impacts, and the ability to engage the public who believe that recycling helps the environment.

The plan explains that the *"program also seeks to innovate by engaging with producers to advance the recycling of various materials and finding new ways to encourage source reduction, re-use, and good recycling practices."* It is notable that source reduction is not shown as a goal in the Stewards Association consultation slide presentation, and left entirely in producer's hands by the speaker. Reuse is still being explored. It is unclear from section 5.1 in the plan how RBC will have any effect on managing environmental impacts, as the section is dedicated

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entirely to industry priorities for keeping all plastics, such as non-recyclable flexible plastics, in the economy by adding recycling value, albeit with no real expectation it will be recycled in Canada.

The plan suggests that RBC acts on behalf of producers to collect and manage materials according to the Recycling Regulations, yet RBC seems to hand some obligations back to the producer. Management of products at the Reduce and Reuse levels of the hierarchy are examples. Is there a menu of duties that PRO's can select in this way, or is complete discharge expected? It is not clear how this decision has been made.

It remains in question whether CPP Golden Design Rules, designed to keep non-recyclable plastic in the economy, should be called "good recycling practices." At what point does 'recycle at all cost' cross the line to bad recycling and bad environmental practices? Non-industry research provides clear conclusions about environmental outcomes that should be used to guide decisions and practice. The research clearly shows that recycling plastic does little to reduce lifetime environmental impact of plastic, and that Reduction, followed by Reuse must be implemented to affect climate change. RBC should manage plastic according to the entire lifecycle environmental impact.

The point should be made that partnering with CPP creates a conflict between EPR principles and industry imperatives that triangulates loyalties. PRO's have a relationship with Producers governed by EPR principles to protect the environment. Announcements of alignment with opposing industry principles could be interpreted as a breach of public trust that the program is protecting the environment, and this is also likely to be at the heart of current public sentiment.

Triangles never work. Something has to give and trending more toward industry alliances seems evident in a change of language and tone noted in the current plan. The changes echo industry priorities. It is notable that the RBC Board of Directors is predominantly consistent of industry representatives.

Targets in 2019 were set for *eliminating plastic waste, and optimizing packaging in a way that reduces the carbon footprint over its lifetime*. Targets in 2022 focus on value chains and keeping all plastic in the economy, regardless of footprint.

In 2019, RBC recognized Roland Geyer research about the state of the planet: It is a crisis that has arisen from: the increasing use of plastics for packaging and single-use products. 2022 consultation language identifies misleading media stories and public confusion for plastic pollution, notably similar to deflection heard often from the plastics industry in the media.

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The 2019 RBC plan aligns with UK Plastics Pact targets of

- ensuring all plastic packaging is re-useable, recyclable or biodegradable;
- eliminating unnecessary single-use plastic through better design;
- including recycled plastic in at least 30% of all packaging; and
- guaranteeing that 70% of plastic is effectively recycled or composted.

Which are notably more stringent and measurable than CPP targets to

- support efforts towards 100% of plastic packaging being designed to be reusable, recyclable or compostable;
- undertake actions to ensure that at least 50% of plastic packaging is effectively recycled or composted; and
- ensure an average of at least 30% (by weight) recycled content across all plastic packaging; and eliminate problematic or unnecessary plastic packaging.

RBC has aligned with CPP goals that promote industry practices and don't align with EPR principles to reduce packaging by applying prohibitive fees that force re-design or remove unsustainable products from the market. An important difference emerges in the way CPP strives to keep low value plastic in the economy. EPR Circular Economy approach is to keep products in the economic process for as long as possible, but at the higher levels of quality. Flexible plastic has value in the economy, and environmental liability as any next version of flexible plastic.

- Giving value by adding oleofin content is known to improve heating value and as such, has application for use as engineered fuel and so will always compete with cost recovery of low-grade pellets from mechanical recycling.
- Down-grading LDPE and HDPE to enable recycling of flexible plastic into some low-grade pellet with uncertain future, is laden with environmental liability (and likely economic liability that would not be tolerated outside of the EPR fee system).

But these practices ensure that producers won't have to eliminate virgin flexible plastic. In this scenario, EPR is enabling producers to violate EPR principles.

CPP depends on PAC Global to educate and advise producers (on CPP GDR website) about plastic, but PAC doesn't promote removal of non-sustainable materials from the market.

CPP Golden Design Rules are flimsy and RBC should not be understood as mandated.

- *"The following companies are engaged in supporting and implementing a packaging design program in alignment with the Golden Design Rules, where they are currently feasible or applicable for their company's packaging portfolio."*
- *Rule #6 Increase Recycling Value in Flexible Consumer Packaging states that "for packaging types where there is not a clear pathway to a recycling system by 2025, (as accepted by industry and targeting >30% recycling rate) this rule is not required to be followed."*

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If there is never access to a recycling system, the producer never has to follow the Rule—a troubling contingency. Simple examination of these rules suggests producers are well advised to sign on to the pact, and reveals that implementation is voluntary and optional.

Why would RBC support 9 voluntary rules that keep non-recyclable or low-grade plastic in the economy when they know that “Based on information from recyclers in the North American market, anything >10% non-PE greatly reduces value today, and it’s unclear that will change before 2025” (from Golden Design Rule #6) and ignore EPR leverage to remove these plastics from the planet in a plastic crisis?

It is noted that RBC also subscribes rather selectively with Ellen McArthur Foundation (EMF) principles. This plan lacks targets and strategy to promote elimination through EPR leverage. However, according to research carried out by Material Economics for the Ellen MacArthur Foundation, producing stuff accounts for around 45% of global CO₂e emissions. Furthermore, there is no current easily available technological change that can reduce these emissions. EMF’s founding targets of the Plastic Pact Network includes elimination of problematic plastic through redesign and innovation. Further, this plan lacks strategy to promote Reuse through EPR leverage; however, EMF promotes movement from single use to Reuse.

Even if the CPP Golden Design Rules were robust, it is unclear how reciting CPP targets fulfills obligations to outline RBC’s targets in this plan.

Section 5.1 lacks mention of Recycling Regulation requirement (viii) the management of the product in adherence to the order of preference in the pollution prevention hierarchy.

5.2 Pollution Prevention Hierarchy

RBC concepts of “pushing materials up the hierarchy are fundamentally flawed: the Recycling Regulation defines use of the hierarchy:

“the pollution prevention hierarchy is as follows in descending order of preference, such that pollution prevention is not undertaken at one level unless or until all feasible opportunities for pollution prevention at a higher level have been taken.”

EPR producer fees should represent true costs of management beginning at the highest level: revenue collected in excess of costs to manage material should be used to support research or implement Reduce and Reuse programs. Reducing fees while a product is being managed at Recovery of energy for fuel undermines any attempt to use the hierarchy as directed in the Recycling Regulations and ignores leverage provided to PRO’s within EPR.

Approval of plans requires management of product in adherence with the hierarchy in the Recycling Regulations. RBC’s version of the hierarchy, noted in consultation documents, fails to address ReDesign, mistakenly equalizes Reduce and Reuse, and omits Material Recovery. RBC

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should use the Recycling Regulation hierarchy with the title Pollution Prevention Hierarchy instead of Waste Management Hierarchy. Prevention of waste is in everyone's interest.

RBC fee system works against the PPH.

Reduce: Fees based on weight disincentivize use of metal and glass that consistently outperform plastic recovery and recycling percentages, and which are, by design, much less toxic to the environment. Moreover, metal and glass have significant potential as Reuse materials and should not be designed out of the system with high fees. Fees for glass and metal have increased since 2017, while fees for the most problematic plastic laminates have been reduced since 2019. Even with the "light-weighted" factor, supplied plastic has consistently outweighed supplied metal and glass since 2017, or as long as category tonnage data have been supplied. Assigning fees based on weight is not having the desired effect of reducing environmental impact.

The 2023 producer fees for EPS make the point. RBC has disincentivized production of EPS by doubling fees, noting expense and difficulty to recycle. The same should be done for light-weighted toxic plastic. EPS is recyclable, and markets are stable. It is interesting and/or puzzling that EPS would be disincentivized, yet non-recyclable light-weighted flexible packaging is kept in the economy and the environment. RBC data reports difficulty collecting and recycling flexible packaging. Pelletizing flexible packaging will have expenses, both in direct costs, and indirect through losses of LDPE and HDPE from their recycling streams. There are few unequivocal conclusions to be drawn from RBC data, but the general drift of this scenario suggests collection and post collection cost efficiencies outweigh environmental impact priorities, which violates any hierarchy. It also suggests that in the producer world, flexible plastic is more valuable in the market than EPS, regardless of toxicity and recyclability, and so industry imperatives rule the day. Regardless, there is inconsistent application of EPR strategies based on cost rather than the hierarchy.

The 2019 plan includes language about reduction: *The program also seeks to innovate by engaging with producers to advance the recycling of various materials and finding new ways to encourage source reduction, re-use and good recycling practices.* There is neither strategy in the plan, nor language in 2022 consultation presentations to suggest there is intent to implement source reduction. Reducing environmental impact is left up to producer initiative or financial affordability of keeping products on the market. Yet surely any substitution of fossil fuels by reducing plastic would provide more benefits than recycling or other management practices farther down the hierarchy.

The 2022 plan suggests that reduction is built into fee schedules. Webinar recordings state, *"Actually in terms of reducing the actual amount of material. Because producers pay fees based on the amount of materials that they put in BC that is a natural mechanism by which they are rewarded for putting less packaging into BC."* As mentioned, current fee schedules are incentivizing continued production of non-recyclable plastic and disincentivizing paper, glass and metal packaging. If

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supplied “light-weighted” flexible plastic is outweighing supplied glass, there is a troubling amount of flexible packaging supplied in BC each year.

It should also be noted that setting higher fees helps to limit materials placed on the market by means of consumer pricing. Small light products can be the most problematic and least recycled, yet cheap to purchase because of the low fees charged to producers using the weight based system.

Re-design is mostly left up to consumers. If “cost allocation” (p. 23 in plan) means producer fees, then these fees are not rewarding easy to recycle materials: fees for hard to recycle plastic have been reduced, and fees for metal and glass and paper have been increased.

Reuse: RBC webinar recordings state, *“We want to use reverse supply chain to bring value to the reusable market to help producers be in the space”, and also state, “we are actively watching and exploring.”* Because RBC collects packaging, it has access to the most available and usable reverse supply chain of all EPR programs. Metal, glass, and plastic packaging screams reuse. Nothing has to be done with my laundry detergent bottle: just fill the damn thing up again and put it on the shelf. It’s 2023!! The reverse supply chain is sitting there to send empty containers back to producers for refill. What an opportunity! Run a pilot.

Btw: No one knows what “Program Plan encourages reuse through cost allocation that presumes supplied materials only enter the marketplace once” actually means or what conclusion to draw from the statement. If it means producers won’t be charged for products re-entering the market in the same capacity as the first time, or after being refilled, then that is sound policy. It would be helpful to spell it out in the plan.

Recycle is not the panacea for the Circular Economy, for waste and pollution, for climate change, for virgin substitution, or for energy savings. Recycle at all cost is detrimental to the environment. This is highlighted by the strategic partnership to pelletize plastic films into low grade product.

Production of low-grade pellets has limited application for the Circular Economy: low grade recycled content is often limited to one or a few cycles before disposal becomes necessary. For this reason, the pellets are typically used in manufacture of single use products (which the Canadian gov’t is committed to banning or restricting this year). In addition, low grade pellets have narrow and low market penetration, and this limits the virgin substitution potential, especially when recycled content dips below 60% (Canada has set targets of 50% recycled content by 2030). These factors, and the indefensible decision to down-grade highly recyclable and valuable LDPE and HDPE, move them down the hierarchy and value chain into a mixed resin category, violate CPP Design Rule #6, and put reduction of environmental impact into question for nothing more than a hail-mary ..“We Recycle!” PRO’s should not shoulder the expectation to recycle to this extent. Producers should not expect recycling at all costs.

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NOTE: Golden Design Rule # 6: *“Based on criteria from the Competition Bureau Canada, only HDPE/LDPE non-laminated films and bags exceed 50% access to recycling in Canada. As such, those are preferred wherever possible for packaging design choices.”* LDPE and HDPE should not be downgraded.

The length RBC has gone to avoid the engineered fuel outcome confirms the RBC message, however unintended, to producers is exactly as stated in the Municipal and Collectors webinar “Great we are now recycling your flexible plastic packaging. Please continue putting it on the market the way it is.” RBC seems to be so confused about messaging.

Reduce and Reuse must be the priorities. Please consider non-industry generated environmental outcome data and re-examine risks and benefits from this project.

Recover Material: RBC uses Recovery in terms of both energy and material, and interchangeably with Collection. It would be helpful to use definitions that distinguish Recover as Collection from Recover as an activity where material or energy is recovered from the product (as defined on RBC website).

It seems disingenuous to suggest in the Activity section that engineered fuel is a downstream use of system residues when primary flexible packaging is the source material. It is also unclear in the hierarchy how material used as engineered fuel does not supply energy. RBC website describes the engineered fuel process as “processing the material into energy pellets.” Making the distinction between engineered fuel and WTE is hollow when heat is a supplied energy at cement kilns. What is to be gained from making them sound unique and different when there is no useful distinction in purpose? The public reads your website.

Note to MOECCS: It is important for the Recycling Regulations to adopt a definition of Recycling that cannot be used interchangeably with Recovery of Material that cannot be recycled. EMA Recyclable definition provides outdated necessary criteria, but falls far short of sufficient criteria. Recyclable has only to meet one of a set of standards: one is *(b)is managed as a marketable commodity with an established market by the owner or operator of a site;* This definition can be used now to report tonnages sold to cement kilns as Recycled. End of Note.

RBC seems to use the hierarchy as a check-list of options rather than a tool to demonstrate how materials are moved from one level to the next—downward as attempts to manage from the top are exhausted—as the Recycling Regulations require. The triangular shape of the hierarchy is meant to graphically represent that the bulk of activity should be taking place in the top

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levels; however, RBC abdicates the roles of Reduce, ReDesign, and Reuse to producers, and the results are clear:

- Increased tonnages of PPP managed by Engineered Fuel almost every year since 2015; in fact, this tonnage has more than doubled since the first year recorded.
- Increased tonnages of PPP managed by Disposal almost every year 2015
- Decreased % of PPP managed by recycling since 2015
- More supplied tonnes of plastics than supplied tonnes of Metal and Glass combined

5.3 Performance Targets

In 2019, the Ministry letter to RBC stated

“the ministry expects continuous improvement across all future plans and amendments including the following areas of concern:

1. *Plan commitments – for example, use specific and measurable language;*
2. *Consumer access – for example, develop comprehensive province-wide accessibility – particularly in rural areas, or improve upon the current Stewardship Agencies of B.C. accessibility standard;*
3. *Consumer awareness - for example, include performance requirements tailored for different consumer groups and all product types managed by the program;*
4. *Financial transparency – for example, provide greater levels of disclosure in financial statements to better serve interests of producers, the ministry, and other stakeholders; and*
5. *Pollution prevention hierarchy – for example, highlight program areas of influence.*

It is not clear in this plan where the improvements have been made, or where the program will have influence (by setting measurable targets) in areas described in this Ministry letter.

The plan lacks specific and measurable language, notably in Section 5.2 Pollution Prevention Hierarchy. The Ministry requires RBC to a) report on “how the collected product was managed in accordance with the pollution prevention hierarchy,” and b) highlight areas of influence in the hierarchy. Vague and non-measurable intentions such as “work directly with interested producers...develop strategies...while leveraging program investments as applicable” and “processors are encouraged” and “RBC actively engages in exploring reuse...to identify the value” all sound like nice ideas, yet do not translate into measurable targets in the plan. Some intentions are word for word from 2015 and 2019 plans, yet have never become measurable targets. Nonetheless, RBC has noted a commitment to adhere to the Pollution Prevention Hierarchy, and targets for each Activity should be set.

Various parts of the plan describe fees, and other parts describe materials, collection, material management, and smattered amongst categories are suggestions of commitment to regulations, performance, and outcomes. Yet, the plan lacks metrics for tracking progress from fee setting through to end fate. Accepted materials categories don’t match fee schedule categories, which don’t match collection and management categories performance target categories. Without consistency of material categories and metrics for tracing, there is no

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ability to set meaningful and measurable targets and assess performance. The plan does not provide for the ability to assess 5 (c) (v) the performance of the producer's extended producer responsibility program, the management of costs incurred by the program and the management of environmental impacts of the program.

When targets are set, they must have meaning: using aggregate tonnage when some 70% of PPP is paper isn't a helpful metric. Targets must reflect program regulations and amendments: setting only Recovery targets ignores the Ministry mandate to *"Provide[s] breakdowns by weight or percentage of product managed at each level"* and provide measurable data to report *"efforts taken by or on behalf of the producer to reduce environmental impacts throughout the product life cycle and to increase reusability or recyclability at the end of the life cycle."* It's an egregious omission to measure Program Performance merely as Recovery Rate, and provide no internal measures of management of material according to the hierarchy and environmental impact. The plan requires such metrics to set measurable targets with outcomes that show improvement. Further, the plan requires transparent methodology for fee setting according to level of management on the hierarchy, and for adjustment of fees when targets are met or set. RBC is becoming a mature program and should by now have sufficient baseline and longitudinal data to assess improvements.

Targets also should align correct strategy with identified areas of underperformance. Communication strategies can be used to correct mismanagement in Collection streams. Setting strategy such as, "Recycle BC will employ the above [Communication] strategies to target and improve any areas of material underperformance in the recycling system" confuse collection with actual recycling performance of material, which makes performance impossible to assess. Communication strategies can address human underperformance in the collection system, but not material underperformance in the recycling system. RBC should adopt operational definitions for expressions like "material underperformance" and be clear about target scope to enable clear target setting.

Voluntary CPP signatory commitments to "Support efforts toward" and "Undertake actions to ensure" are neither measurable nor accountable to the Ministry or the BC public. Moreover, RBC should not subjugate EPR principles to flawed rationale to keep non-recyclable plastic in the economy to keep it out of the environment.

Targets should also be set to meet Regulation requirements rather than arbitrary improvements on poor results used in the plan to set Recovery targets. Likewise, where the Regulations lack definitions, operational definitions should be developed to set targets, and Regulation Pollution Prevention Hierarchy should be used to set targets.

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It seems most clear in Performance targets sections that RBC walks a fine line of disparity between Ministry regulated EPR/Pollution Prevention Hierarchy principles and industry profit imperatives. CPP and ultimately PAC alliances over-represent industry influence and dilute environmental impact targets.

5.3.1 Program (Aggregate) Recovery Rates are meaningless, especially when almost 65% of collected material is 100% recyclable paper. Product category data is needed to track progress of each material for fee setting (which RBC says is unique for some materials) “A key component of the fee setting methodology is its mechanism for adding cost to uncollectable and/or underperforming material categories.” As such, category Recovery rates should become fodder for category fee setting, and not an end in themselves.

NOTE/QUESTION TO MOECCS: Is it not the case that early MMBC discussions and subsequent allowances for aggregate Recovery reporting were designed to permit geographical aggregation, as in across the province, but not across product categories? Plan approval is based on the expectation of a 75% recovery rate for each product category. End of Note.

Plastic has never achieved a 75% Recovery rate, yet the plan states “To date, Recycle BC has met the program recovery rate target each year since the program’s launch in 2014.”

Recovery rate calculations should not use offset methods for program or single material analysis. It is likely that Ministry reporting requirements assume same-year numerator/denominator data. Since every method will include old data, there is no point to using different years in a single equation. There is even less point to using offset data for program performance and aligned data for material category performance. Why not use same-year supply and recovery data, with a calculated margin of error?

The 2019 plan defined a vision that included recognition of the global plastic crisis, and cited Roland Geyer research reporting 9% recycling rates. RBC developed a vision to *Develop consistent measurement protocols to report performance against material specific collection and **recycling performance targets** (i.e. Paper, Plastic, Metal and Glass) as well as for **reporting the recycling performance of material sub-categories (with a focus on plastics)**.* Recovery rates continue to be the focus of performance. Further, there is no such commitment to develop measurement protocols that assess material-specific recycling performance in the 2022 plan, and certainly no targets or strategy that focus on plastics.

5.3.2 Material Category Performance Targets

It is disturbing from an environmental perspective that the only strategy to address a 25% recovery rate of non-recyclable flexible plastic, managed as alternative fuels to date, is to increase recovery rates.

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Since viewing a webinar that describes the next version of managing flexible plastic by pelletization, it is just as disturbing from an environmental perspective that the only strategy to address a 25% recovery rate of flexible plastic, blended with downgraded HDPE and LDPE into low grade pellets at the cost of some unknown environmental footprint, is to increase Recovery rates.

As noted, Regulations require that *“the plan will achieve, or is capable of achieving within a reasonable time, a 75% recovery rate or another recovery rate established by the director, for each product category covered by the plan.”* Given that a reasonable time has passed, and no plastic material or category has ever met the 75% recovery rate, targets should be set, with strategy to achieve 75% rather than an arbitrary rate.

This plan appears to have one target for managing material. It appears in Appendix E as a Pollution Prevention Hierarchy Target to “Direct 85% to 90% of collected PPP to recycling commodity markets.” Not only is this target verbatim from 2015, there is no strategy to measure progress toward the goal. Given that the percentage of material managed by Recycling has dwindled since 2017, yearly targets with strategy should be set to track progress and make adjustments.

As tonnages of non-recyclable plastic supplied continue to outweigh recyclable glass and metal, single material targets should be set with strategy to achieve and assess progress.

RBC has seemingly adopted CPP’s targets, but with no apparent program strategy and targets for *“engaging with producers to advance the recycling of various materials and finding new ways to encourage source reduction, re-use, and good recycling practices.”* Targets are needed for each material for each year to match RBC’s commitment *“to innovate.”*

In order to measure progress for *“how the Recycle BC program and Program Plan will adhere to the pollution prevention hierarchy,”* RBC should set measurable targets for each Activity and for each material in order to meet Recycling Regulation requirements for reporting. Targets are needed to measure

- *“how each material managed at each level of the hierarchy,”*
- *“how the collected product was managed in accordance with the pollution prevention hierarchy,”*
- *“the comparison of the approved plan’s performance for the year with the performance measures, performance requirements and targets” and,*
- *“year over year improvements” mandated by the Ministry.*

At the very least in the short term, set targets that establish baseline data for tonnages of each single material supplied, collected, and managed at each level of the hierarchy.

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There are a number of data tracking and reporting initiatives RBC could set to increase ability to set targets for management at each level of the hierarchy, and ensure program improvement each year.

- Establish fees for each material. Eliminate category fees.
- Eliminate all “Other” material categories: identify all materials for tracking from fee schedule through material management to end market fate.
- Report tonnages supplied and collected for each/every material every year
- Report end fate past sale to processors such as Merlin Plastics.
- Repair relationship with public over life of the plan. Start with data gathered from the public.
- Set targets to educate all producers about EPR principles and PRO responsibility to manage materials according to the hierarchy and to reduce plastic production.

Once baseline data is established, set targets to maintain or increase management at the top levels of the hierarchy; for example, percent increase of materials removed from lower levels and

1. eliminated or
2. ReDesigned for Reuse
3. ReDesigned for high value Recycling.

Please consider the importance of data for this purpose: Use third-party research to confirm footprint analysis for management of materials. Not all recycling has a better footprint than landfill or even incineration. Circular Economy at all costs can have detrimental environmental impact and the planet can’t support any more scalable disasters. Public trust can be supported with informed decision making.

For example, this paper finds that Canada must assess how the growth in plastic packaging waste generation over time has witnessed coinciding increases with food waste. In Canada, most plastic waste is derived from single-use plastic food packaging

Walker, T.R., McGuinty, E., Charlebois, S. et al. Single-use plastic packaging in the Canadian food industry: consumer behavior and perceptions. *Humanit Soc Sci Commun* 8, 80 (2021). <https://doi.org/10.1057/s41599-021-00747-4>

This paper examines and compares effectiveness of various forms of recycling on Circular Economy goals.

Horodytska O, Kiritsis D, Fullana André, Upcycling of printed plastic films: LCA analysis and effects on the circular economy, *Journal of Cleaner Production* (2020), doi: <https://doi.org/10.1016/j.jclepro.2020.122138>.

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5.4 Performance Metrics

Metrics should be developed to support tracking of all areas of program performance beyond Recovery.

5.5 Third Party Assurance

How did non-PPP tonnages and offset methodology get by the auditors?

6. Consultation A consultation report will be included in the final submission to the Ministry of Environment and Climate Change Strategy in April 2023.

Full consultation is needed once a plan to manage the new materials from OIC 370 is supplied to the public.

From: Cinci Csere [REDACTED]
Sent: December 12, 2022 3:28 PM
To: Recycle BC Consultation
Subject: Improving the Recycle BC Program Plan

CAUTION: This email originated from outside of the organization.

To Whom It May Concern,

We are very involved in shifting the way construction waste is managed and the opportunities to divert it, especially plastics.

Construction plastics have no place to go to be recycled as there are no programs that Recycle BC oversee of the recycling standards and abilities of the construction industry. As well as there are no EPRs in place for the construction sector.

This brings us back to our original and ongoing problem of there being no recycling facilities that will accept construction and ICI plastics. The construction sector is not being afforded that same accessibility to recycling as the residential sector.

We are concerned that the contractors who have improved and changed their waste management systems on site, who have source separated and put the effort in to recycle their plastics will be discouraged upon finding out that these construction specific plastics actually cannot be recycled and will be thrown into the landfill or put into waste to energy. This also could have negative effects down the line as they see this to be a waste of their time and money.

Our concern is that we are going to start a movement that has nowhere to go due to an inability for the construction industry to recycle properly.

The majority of the public facilities that we deal with do not accept plastics from commercial haulers and sometimes not even contractors. There is only one place in all of the Metro Vancouver area, close to our main areas we serve, where we can take plastics and that is WCS on the North Shore. They will take them but there is a charge associated with it for disposal.

The type of material (when we expand this to all of the common recyclables) will also dictate what we are able to recycle at the Metro facilities. Some facilities allow us to dispose of cardboard, some allow us to dispose of certain plastics and some do not even allow us in the recycling area period. Metal is accepted commercially at all these facilities but that is the only consistent one in all of them.

Plastics by far though are the one that we are most frequently turned away from recycling such as styrofoam, 6 mil poly, hard common plastics seem to fluctuate with what and when we are allowed to recycle them at Metro and public facilities.

The hard to recycle plastics such as EPS foam (in large quantities), building wrap and lumber banding and much more, all have to go to WCS as they are not accepted at the public facilities.

Here is our thoughts on what we need to be successful in achieving zero waste in the construction sector:

1. Ability for all plastics to be recycled and reused staying in Canada (BC)
2. We need to not be reliant on market evaluations of these materials in order to deem their eligibility / priority of what gets recycled
3. We need to audit these plastics so they can be designed to be recyclable or have proper EPR programs for it
4. We need the infrastructure to divert it ASAP

Plastics of concern: 6mil poly or any poly, any hard plastics that are used in building such as window corner gussets, blue and pink rigid styrofoam, this is another product which cannot be recycled. ICF foams (white and blue) and the black plastic insert that holds them together.

Squishy -> EPS foam sheet and block as well as black foam. The EPS foam sheets are usually found in packaging, between flooring and it is also called "sill gasket" which is placed between concrete and wood in the framing stage of a build. We have found lots of this material in garbage bags deemed "garbage" so you can imagine how much space this can take up in the landfill. There currently is no area to recycle it at the transfer station so most builders throw it in the garbage section.

PVC or ABS pipe and tarps could be recycled but there is nothing currently set up at the transfer station to divert it from the garbage section.

Black, white or green plastic banding as well as polypropylene strapping used to wrap material on pallets, especially lumber which you see at any building supply store. Apparently there is a market green strapping or an EPR opportunity for this, the white and black strapping, go to garbage or waste to energy.

Tyvek building wrap and lumber wrap is recyclable but there is again no section at any of the transfer stations to put it in so builders just end up throwing it in the garbage section of the transfer station.

The majority of the hard to recycle plastics, we do take to WCS as they will downstream it to West Coast Plastics, Merlin or a waste to energy stream.

Lastly;

- The program needs to set high targets for **reduction and reuse**, develop actions to achieve them and provide funding.
- The program must have a plan to provide comprehensive service to **all communities** in BC who request it, including First Nation and rural communities. The program must provide service to all multifamily buildings.
- The program should **pay the full costs** of providing these services and not continue to download them to communities and the environment.
- Fees need to be set to drive a **decrease in plastic** use.

Thank you,

Cinci

--

Cinci Csere

Co-Founder

Tel: 604.812.6837

www.seatoskyremoval.ca



From: Jennifer Henry [REDACTED]
Sent: November 18, 2022 4:46 PM
To: Recycle BC Consultation
Subject: Draft plan feedback

CAUTION: This email originated from outside of the organization.

Hi [REDACTED]

Thank you for your presentation this week. Prior to working for SPEC as Executive Director, I became a Master Recycler, and worked in North American ICI waste innovations (sales mostly) since 2012. I thoroughly enjoyed your presentation, and found it to be transparent and informative.

I'm pleased to have the opportunity to submit feedback from our non-profit standpoint.

I wholeheartedly support the move to broaden the Other Plastics stream to include soft foam and plastic bags. I'm so glad to hear the pilot program with Merlin yielded this result. I feel we are fortunate to have them as a partner in BC, and I applaud RecycleBC's willingness to support innovations like this. I know little about Merlin, but I admire their innovative nature.

SPEC's Zero Waste Committee meets monthly, and they have formed an active MURB sub-committee whereby our volunteers educate willing MURB stratas on how to make the highest and best use of their RecycleBC curbside service, dispel myths, ensure proper labelling is in place, and engage the strata to move beyond curbside streams and also collect for depot streams (so long as a steward is in place to drop them off). The MURB committee will be very interested to hear of the expanded Other Plastics stream, and will add this to the information they deliver to MURBs once you announce it.

I want to offer SPEC's voice and audience to get the message out that our RecycleBC EPR program is not among the bad actors contributing to the low recycling rate so commonly depicted in the media. Please let me know if there are any messages we can amplify or feature in our newsletter and on social media.

Finally, I'd love to get on a call with you to discuss a solution for RecycleBC to serve rural and remote areas via carbon-offset courier. In my years in the industry I've helped to divert over 8 million lbs of waste from North American landfills and waterways, all via courier. I'd love to share my knowledge. Do you have some time for a call?

Sustainably yours,

Jennifer Henry
Pronouns: she/her
Executive Director
SPEC - Society Promoting Environmental Conservation
P: 604-736-7732

I acknowledge that I live, play, and work on Katzie & Kwantlen territory.

From: [Paulo Eichelberger](#)
To: [Recycle BC Consultation](#)
Cc: [Administration Shared](#)
Subject: Feedback on Recycle BC Draft Program Plan for Packaging and Printed Paper
Date: Saturday, December 31, 2022 2:42:49 PM

CAUTION: This email originated from outside of the organization.

Good afternoon,

Following up on your recent consultation sessions regarding your draft program plan updates, we'd like to submit the following feedback:

New Products Added - Recycle BC (RBC) has added a significant amount of single-use and packaging-like products in accordance with the MOECCS' 2020 amendment to the Recycling Regulation (Jan 1, 2023). The expansion of products collected under this program is appreciated.

Key takeaways:

- We do note that the bulk of these problematic materials are collected under the depot program. This expansion should increase the volume of recyclables collected under the program, though this assumes that existing depot operating levels are maintained, at minimum.

New Community Eligibility Criteria & New Integrated Recycle BC Collection Services (ICS) (Proposed Recycle BC Program Plan – Section 4.3.5 & Appendix C):

Summary of Eligibility Criteria

1. Municipalities with >10,000 Population
2. Municipalities with >2,000 Population
3. Small Communities > 1,000 Population, with permanent grocery store in commercial centre open year-round, located >40km from a population centre with more than 10,000 residents.

Summary of ICS

ICS is done primarily through depots, provides “a service or combination of services that provides regular opportunities for the collection of all categories of PPP accepted in the Recycle BC program.”

Additional excerpt - “Recycle BC will honour existing depot agreements with collectors that provide collection services in communities that do not meet the eligibility criteria outlined in Appendix C but may not take steps to replace this service if the current collection partner decides to no longer provide this service.”

Key takeaways:

- During consultation, we heard that Recycle BC would extend the statement of work for depot agreements from December 31, 2023 to December 31, 2024. This is truly appreciated. However, it's noted that many existing depots across BC, including our depot in Bamfield, do not meet the proposed population eligibility criteria. The draft ICS language, suggests that existing depots, like Bamfield, are not guaranteed Recycle BC service or funding after December 31, 2024. If these depots are eliminated from the Recycle BC program, this would be a reduction in service to area residents, which could lead to either:
 1. Increase in fuel costs and GHG emissions to residents that have to travel further to drop off recyclables or;
 2. An increase in recyclables being landfilled should residents decide the cost of travelling further to drop off their recyclables is too great.
- Should this occur, this would see a reduction in recyclables captured under the RBC program. This conflicts with the intent of Extended Producer Responsibility (EPR) under BC legislation which states *"such as manufacturers, distributors, and retailers to take responsibility for the life cycle of the products they sell, including:*
 - *Collection, such as curbside collection or collection depots*
 - *Recycling the packaging and products they collect"*
- It is recommended that program language be revised to ensure that existing depots are recognized in RBC agreements beyond 2024. This, coupled with the aforementioned inclusion of new materials, will see an increase in captured recyclables under this EPR program.

We would like to thank you for the opportunity to provide feedback on this important program.

Sincerely,

Paulo Eichelberger (He/him)

Solid Waste Manager

Alberni-Clayoquot Regional District

3008 Fifth Avenue, Port Alberni, BC

Phone: 250-720-2725



receive this email in error please notify me immediately and delete it.



Making a difference...together

Parks & Environmental Services T: 250.360.3000
625 Fisgard Street, PO Box 1000 www.crd.bc.ca
Victoria, BC, Canada V8W 2S6

January 3, 2023

File: 0220-20
General Correspondence

Recycle BC
405 – 221 West Esplanade
North Vancouver, BC V7M 3J3
Via email: consultation@recyclebc.ca

Dear Sir/Madam:

RE: PROGRAM PLAN 2023-2028 CONSULTATION

The purpose of this letter is to present Capital Regional District (CRD) staff feedback on Recycle BC's proposed Packaging and Paper Product (PPP) Extended Producer Responsibility Plan Consultation Draft (September 29, 2022).

The CRD operates Hartland Landfill, and through the CRD's new Solid Waste Management Plan (SWMP), has set a target over the next decade to reduce the capital region's per capita annual waste disposal rate to 250 kg, a 38% reduction from current levels.

In support of this work, the CRD has recently conducted a waste composition study, which will be published in February 2023. Our results identify that approximately 18% (or 11,752 tonnes in 2021) of the residential sector material received at Hartland Landfill is regulated PPP that should be addressed under Recycle BC's stewardship plan. This does not account for the industrial, commercial and institutional sector PPP which is estimated to be an additional 11,841 tonnes of the waste stream.

To divert these recyclable materials out of the residential solid waste stream, the CRD recommends that Recycle BC's proposed EPR plan be enhanced as follows:

- 1. Establish appropriately ambitious performance and recovery targets.** The proposed targets within the draft stewardship plan don't align with the established provincial per capita waste disposal targets that Regional Districts are mandated to incorporate into Solid Waste Management Plans, and are set too low to result in improved diversion rates. The proposed EPR plan targets allow for the plan to focus efforts primarily on highly populated areas and avoid adequately addressing collection from the multi-family sector and servicing rural and remote regions of BC, including First Nations communities. The CRD suggests that by 2027, Recycle BC should be targeting >90%+ recovery rate for regulated materials.
- 2. Invest in enhanced service levels in all areas, and in particular, in an effective collection program for multi-family residents.** The proposed plan relies heavily on partnering with local governments for provision of services for residents living in multi-family buildings. However in the capital region, like many other jurisdictions in the Province, recycling services for the multi-family residents are provided primarily by the private sector. The current financial incentive-based approach doesn't respond to market realities as evidenced by low program participation in the capital region, and needs to be revised to achieve higher participation by multi-family buildings.

- 3. Maintain single family residential curbside collection, including providing adequate per household funding that meets the actual costs of collection, now and in the future.** The CRD's recently completed Request for Proposals for a post-2024 PPP collection contract identified a future per household collection cost of \$62.87, annually. The annual \$42.80 per household fee paid by Recycle BC will only cover 68% of the cost of collection. The proposed program plan doesn't identify how Recycle BC will ensure the cost of collection isn't transferred over to Regional Districts.
- 4. Enhance depot services and commit to 'grandfathering' in service at existing depots.**

 - a. New depots:** The integrated collection model proposed in the draft plan doesn't address siting depots/establishing new depots and relies on regional districts, municipalities or the private sector to shoulder the costs associated with new depot start-up. The program plan should be revised to have Recycle BC directly address the barriers to siting new depots, including costs of land acquisition and capital infrastructure.
 - b. Current depots not meeting criteria:** Under the proposed plan, the depot siting criteria excludes funding depot service in communities with less than 1,000 residents living within a 30 minute radius. This is of particular concern for two CRD depots: Saturna Island and Port Renfrew, which services both the Port Renfrew community and Pacheedaht First Nation. The CRD would like the program plan to consider how waste material is being managed in rural communities and commit to maintaining service at all existing Recycle BC depots.
- 5. Provide access to provincial PPP processing and marketing for all regulated products, irrespective of community size or location.** The proposed program plan excludes curbside and depot funding for communities of less than 1,000 people, and does not identify or allow for a modified system that bridges the gap between a system fully supported by producers and one funded fully by smaller or remote communities where collection and transport costs are higher. After Recycle BC recently suspended service in Port Renfrew (a community of approximately 300 residents), the CRD was challenged with finding processing in a system dominated by Recycle BC, and obliged to pay for 100% of processing costs for collected PPP or landfill the material. A hybrid system needs to be established, and the program plan needs to commit to providing access to PPP processing and marketing for all regulated products, even if the cost of transport must be capped in rural and remote communities.
- 6. Enhance system for collection of non-curbside materials to improve access to services and, in turn, recovery of material.** The collection of flexible plastics and foam packaging is available to capital region residents at depots on the islands and in Port Renfrew. In the urban areas, drop off is available at locations in Saanich (3), Oak Bay, as well as Esquimalt and Sidney Return-it Depots. All other communities are served by two London Drugs locations who have limited capacity to service the remaining 200,000+ residents. We are encouraged to see Integrated Recycle BC Collection Service being proposed for the City of Victoria and communities in our West Shore, not currently being serviced. An expansion of drop off opportunities for all products in urban areas will support residents in both single-family and multi-family buildings.
- 7. Enhance streetscape programming in urban areas.** We acknowledge the work that has been undertaken since 2014 to study streetscape collection and encourage Recycle BC to

expedite their proposed timeline for managing material from this sector as there are a number of municipalities in the capital region continuing to fully fund collection of PPP and its associated challenges with access to processing/marketing.

The CRD believes that within the context of the EPR framework, the only way to divert residential regulated packaging and paper materials from the landfill is for the PPP EPR program to establish adequate targets, provide enhanced funding that meets the operational realities and true costs of collection, and continue the collaborative relationship between stewardship agencies and regional governments.

Given the important role that EPR programs play in supporting regional districts to meet SWMP targets developed under the BC Environmental Management Act, CRD staff will also provide feedback on both the draft plan and the regulatory framework directly to staff within the Ministry of Environment & Climate Change Strategy (ENV).

The CRD looks forward to continuing the strong relationship we have forged with Recycle BC as we work together towards diverting regulated packaging and paper from the residential waste stream. Please don't hesitate to contact me to discuss in further detail any of the feedback provided by the CRD.

Best regards,



Liz Ferris
Manager, Policy & Planning
Environmental Resource Management, CRD

c.c. Bob McDonald, Director, Extended Producer Responsibility, ENV
[REDACTED], Western Canada Director, Recycle BC
Russ Smith, Senior Manager, Environmental Resource Management, CRD



CITY OF
CHILLIWACK

December 30, 2022

Recycle BC
405 – 221 West Esplanade
North Vancouver, BC V7M 3J3

File No: 5360-02
Engineering Department

Via email: consultation@recyclebc.ca

Dear Recycle BC:

Re: Feedback on Draft 2022 Packaging and Paper Extended Producer Responsibility Plan

Thank you for the opportunity to provide feedback on Recycle BC's Draft 2022 Packaging and Paper Extended Producer Responsibility Plan. The City of Chilliwack has the following comments:

Program Financing:

The City generally agrees with the approach Recycle BC takes for program financing, with the following two key concerns:

- The fees paid by producers are not sufficient to cover the full collection service costs and provide adequate access to depots.
- The fees should be set to provide even more of a disincentive to producers of difficult to manage packaging.

Accepted Materials:

Recycle BC should work with the Ministry of Environment and Climate Change Strategy (ECCS) to expand the paper product category to include books. Although reuse is promoted by municipalities, not all books are able to be reused and there are frequent inquiries from the public about recycling options. The City would like to see a recycling solution implemented for books under this EPR program.

The City welcomes the expansion of the program to include single-use products and packaging-like products in January 2023.

The City is also supportive of including compostable PPP in the program, with associated financial incentives to be established through consultation with collectors and industry stakeholders.

Integrated Recycle BC Collection Services:

Additional depots are required in some communities to ensure adequate accessibility. The City applied to Recycle BC to include our recycling depot at the Bailey Landfill in the program in 2013 but has yet to be approved. The cost of managing PPP received at this depot should not be borne by residents.

Streetscape Collection:

The City recognizes the challenge of high contamination levels with streetscape collection and appreciates the research and trial efforts being undertaken by Recycle BC to try to support recovery of PPP from this source. We look forward to continued research and stakeholder consultation in 2023.

Financial Incentive Methodology:

The financial incentives for curbside collection services do not cover the full cost or adequately address inflationary increases. This creates an inequity between communities performing the collections and communities where Recycle BC performs the collections directly, which needs to be resolved.

Post-Collection:

Further consideration of post-collection logistics is needed. The current Statement of Work (SOW) for Curbside Collection Services Provided by Local Government includes an unreasonable maximum distance between the service area boundary and the designated post-collection facility and allows too short a timeframe for changes to be made to the designated post-collection facility. For areas outside of Metro Vancouver, the SOW allows Recycle BC to designate a facility within 60 km of the nearest boundary of the service area, and changes can be made with 30 days' written notice.

When Recycle BC attempted to change our designated post-collection facility from a site in Chilliwack to one in Abbotsford in 2020, it would have increased our curbside collection costs by \$500,000-\$1,000,000/year (\$23-\$45/household/year), depending on the transport solution, with no increase in financial incentives. We are concerned that the current framework allows these types of decisions to be made without due consideration of the financial impact to residents, which would result in a failure to achieve Recycle BC's core objective of shifting the cost of managing PPP from residents to producers of the material.

Communications:

For communities that have opted to perform curbside collection, the results of every Recycle BC audit should be provided to the community in a timely manner (e.g. share results of all audits conducted in a month by the 15th day of the following month). This will allow the collectors to better monitor contamination trends and roll out more specific education to residents.

We appreciate the education materials developed by Recycle BC for use either directly by Recycle BC or by collectors, and we encourage continued expansion of education materials and other strategies that aim to reduce contamination.

Pollution Prevention Hierarchy:

The City generally supports the Program Plan's pollution prevention hierarchy. We agree Recycle BC should be setting producer fees and taking other measures to reduce PPP as much as possible and improve reusability or recyclability. We would support even stronger financial disincentives, in conjunction with the provincial and federal plastic pollution reduction efforts to achieve these goals.

The City appreciates Recycle BC's commitment to not send PPP to energy-from-waste facilities but continues to be concerned about the inclusion of engineered fuel products in the hierarchy due to the adverse effects that industrial emissions may have on air quality in the region.

Performance Targets:

The City agrees with Recycle BC's proposal to switch to the aligned recovery rate methodology for calculating material category recovery rates. We recommend the aligned recovery rate methodology also be used for calculating program recovery rates. Given the delay in the reporting of supplied quantities, Recycle BC could, in the interim, report annually based on the offset methodology but update the recovery rates to the aligned methodology when the supplied quantities data becomes available.

The City also agrees with Recycle BC's proposal to remove non-PPP quantities from the recovery rates to better reflect actual program material recovery.

With respect to the proposed recovery targets, the City would like to see a higher target recovery rate for plastics and additional efforts to achieve those targets. Recovery of flexible plastic in particular is significantly lower than the other material types. The City appreciates the effort Recycle BC and Merlin Plastics have undertaken to find a solution for recycling OFPP, to avoid this material being used as an engineered fuel. With this recent development, the City would like to see more effort made to divert this material from disposal.

Thank you again for the opportunity to provide feedback on the draft Program Plan. If you have any questions about our comments, please contact the undersigned at 604.793.2701 or tfriesen@chilliwack.com.

Sincerely,



Tara Friesen, P.Eng.
Manager of Environmental Services

Copy Ministry of Environment and Climate Change Strategy –
ExtendedProducerResponsibility@gov.bc.ca

THE CORPORATION OF THE CITY OF GRAND FORKS

7217 – 4TH STREET, BOX 220 • GRAND FORKS, BC V0H 1H0 • TELEPHONE 250-442-8266 • FAX 250-442-8000



OFFICE OF THE MAYOR

January 12, 2023

Recycle BC,
405-221 West Esplanade,
North Vancouver, BC,
V7M 3J3

SENT VIA ELECTRONIC MAIL TO: consultation@recyclebc.ca

Dear Sirs/Mesdames,

**Re: Comments on Recycle BC Packaging and Plain Paper Extended Producer
Responsibility Plan – Consultation Draft, September 29, 2022**

I am writing on behalf of the Council for the City of Grand Forks (City) as part of the followup of a discussion at the January 9, 2023 Committee-of-the-Whole meeting.

Rather than repeat the comments already submitted by the Regional District of Kootenay Boundary, *I would like to first echo their sentiments about the proposed changes to the Packaging and Plain Paper Extended Producer Responsibility Plan*, and add the following thoughts regarding our specific area.

While Recycle BC intends to honour existing depot agreements, there is concern that if more remote depots in our region (Christina Lake, Rock Creek) were to close, there would be additional pressure on the private depot operated in Grand Forks. Causing rural residents from 30-40km away to be forced to utilize this centre would exacerbate a existing challenges regarding space, parking, operating hours, and staffing levels. Our depot manages, but is noted for being a busy location. It's commonly held that for recycling to be successful, it must be as convenient as possible. Keeping the service accessible in remote/rural areas is critical to that success.

Grand Forks City Council would like to thank you for your consideration.

Sincerely,

A blue ink signature of Everett Baker, consisting of a stylized 'E' and 'B'.

Everett Baker,
Mayor,
City of Grand Forks

EB/km



CITY OF GREENWOOD

PO Box 129
Greenwood, BC V0H 1J0

Phone: (250) 445-6644 Fax: (250) 445-6441 Email: oc.greenwoodcity@shaw.ca Website: www.greenwoodcity.com

January 25, 2023

Recycle BC
405-221-West Esplanade
North Vancouver, BC

Sent by Email: consultation@recyclebc.ca

Dear Recycle BC:

Re: Recycle BC Packaging and Printed Paper Extended Producer Responsibility Plan

Council for the City of Greenwood reviewed the correspondence submitted by the Board of Directors for the RDKB to Recycle BC regarding the Packaging and Printed Paper Extended Producer Responsibility Plan at their January 9, 2023 regular Council meeting. Council for the City of Greenwood would like to take this opportunity to support the recommendations and concerns raised by the RDKB.

The City of Greenwood does not support changes to operating criteria and eligibility requirements that may result in the elimination of currently operating Recycle BC depots in the Boundary region. The City of Greenwood's residents rely on the services provide by the local depot, the West Boundary Landfill. The changes outlined in Recycle BC's "Draft Program Plan" could result in reduced resident services currently available to users in and around the City of Greenwood.

Sincerely,



John Bolt, Mayor
City of Greenwood

cc: Linda Worley, RDKB Board Chair



ENGINEERING AND PUBLIC WORKS

Jan 3, 2022

Recycle BC
405-221 West Esplanade
North Vancouver, BC

Dear Recycle BC:

**Re: Packaging and Paper Product Extended Producer Responsibility Plan –
Consultation Draft September 29, 2022**

Thank you for the opportunity to provide feedback on Recycle BC's draft Packaging and Paper Product Extended Producer Responsibility Plan. The City of Mission (the City) joined Recycle BC as a collector under this program in 2017. We appreciate the value that this program provides to our community and the role that EPR programs play in helping us achieve our waste reduction targets.

Our feedback is summarized as follows:

1. **Program Financing.** We appreciate the complex nature of determining producer costs and we support the fee setting methodology that adds costs to uncollected or underperforming material categories to drive advancement along the pollution prevention hierarchy. As the volume of flexible PPP seems to be increasing over time, we would like to see Recycle BC leverage this methodology to help further influence producer packaging choices away from harder to recycle packaging such as flexible plastics.
2. **Sources of Packaging and Paper Product.** We understand that residential premises are defined in the provincial Recycling Regulation and therefore Recycle BC does not have the authority to change this definition. We feel that accommodations where people reside should all be included as residential, whether there is care or services provided or not. Prior to joining the Recycle BC program, the City collected recycling from a number of care facilities under our multi-family collection program and feel strongly that these locations should be included in the Recycle BC program.

In reviewing audit reports supplied by Recycle BC, "not accepted PPP" is included in the total not-accepted material contamination category, however this material is packaging and should be moved from the not accepted material category to the incompatible material category so that it doesn't count towards a service level failure credit score.

3. **Financial Incentive Process.** We understand that contamination has a strong impact on Recycle BC's ability to market collected materials, however based on the results of the most recent cost study, Recycle BC is not covering the average cost for collection. The plan states that inflation is part of the analysis, but with the lagging nature of the study using 2019 cost data to set rates for 2022 – 2025, and the impact of inflation on collector costs, we feel that program incentives need to cover at least the average collection costs, with consideration for increasing incentives to account for inflation.

Considering that multi-stream collection provides for a much more marketable material, then consideration should be given to incentivize collectors to move towards multi-stream models. The current difference in collector compensation rates is not substantial enough to justify a transition from single to multi-stream collection given the costs of such a transition. The City suggests Recycle BC investigate what an incentive could look like to shift collectors from single to multi-stream collection.

4. **Pollution Prevention Hierarchy.** We appreciate that BC is a small piece of the market for many of its producers and that actions taken by Recycle BC may not be significant enough to influence packaging design or material choice. We hope as other provinces implement EPR for packaging we start to see some real shifts. We support ongoing review of producer fee structure in sending the right signals to producers that will result in an increase in the recyclability of their packaging choices. We encourage Recycle BC to continue taking an active role in exploring how to support packaging reuse and how reverse supply chain networks can be incorporated into the program.
5. **Performance Targets.** We support moving towards an aligned recovery rate in measuring performance over the offset rate, as the aligned rate shows the true recovery rate. We feel that the program should use the aligned rate in program evaluation, but also show the offset rate in the annual reports to provide current data. We support the proposal net out contamination from recovery rates as this better reflects the recovery of the material.
6. **Material Performance Targets.** We support using the proposed aligned recovery rate in measuring material performance. We also support the material category performance methodology that kicks-in to re-calculate targets if a material reaches its performance targets for two consecutive years. We feel that the proposed targets for plastics could be increased, specifically for the flexible category considering the increasing shift towards this type of packaging in the market.
7. **Landfill Composition Targets.** Given that waste composition studies are performed by local governments on a regular basis, and that these studies typically included sector-performance data (i.e.,

residential packaging), we feel that Recycle BC should incorporate landfill composition audits as part of their program assessment. Consideration should also be given to compensating local governments for the amount of program material entering landfills.

8. **Communications.** We appreciate and support the communications approach taken by Recycle BC and value the resources provided on the collector's portal. We suggest that Recycle BC collaborate with municipal communications departments to leverage efforts of achieving the same objectives of reducing contamination and increasing participation.
9. **Curbside Eligibility – Transition to Provision of Service by Recycle BC.** We appreciate that it takes time to develop, procure, communicate, and hand over collection services to another party. However, we feel that there should be an option for interested municipalities to request Recycle BC to directly operate PPP curbside collection in their communities prior to the termination date of their curbside collection agreement provided all other requirements are met including providing two years' notice prior to the proposed transition date.

We appreciate the opportunity to provide feedback on this plan. Feel free to reach out if you like to discuss or clarify any of these suggestions.

Sincerely,



Tracy Pagenhardt, R.B.Tech
Environmental Technician



To: Recycle BC
From: City of Nanaimo
Re: Packaging and Paper Product Extended Producer Responsibility Plan:
Consultation Draft
Via Email: consultation@recyclebc.ca
Date: January 4, 2023

Thank you for the opportunity to provide feedback on Recycle BC's draft Packaging and Paper Product Extended Producer Responsibility Plan. The City of Nanaimo (the City) joined Recycle BC as a collector under this program in 2012. We appreciate the value that this program provides to our community and the role that EPR programs play in helping us achieve our waste reduction and Environmental goals.

Our feedback is summarized as follows:

1. Program Financing and Compensation Program

We agree with the principle that all obligated materials should bear a fair share of the costs to manage the package and paper product program. However, we feel the current structure of the compensation program does not adequately consider several factors that greatly affect the actual cost of collection for collectors:

- The actual collection distance and the impact that population density has; the greater the density the lower the collection distance and consequently the collection cost.
- The actual transportation distance from the collection area to receiving facilities; greater travel distances incur higher costs.
- The collection volume per household is not considered; all municipalities are paid the same though they are not collecting the same volume of materials.
- The cost of consolidation is not covered under the current compensation program.
- There is no mechanism in place to deal with inflation and rapid collection cost increase.

In order to deliver an efficient program, the City has optimized its curbside collection program in 2020-2021, and once more enhanced the collection in 2022. The city has used 9 collection trucks, to provide the service to 30,000 users, collecting approximately 6,700,000 Kg of Landfill Waste, 8,500,000 Kg of Organic, and 3,800,000 Kg of Recycling materials. Despite these efforts, and due to the change of receiving facility to a further location, the City is significantly underpaid for the cost of collection.

We strongly believe the fee structure needs to be revised to cover the actual collection cost.

2. Integrated Recycle BC Collection Services

We understand that there are many considerations with ICS and with siting depots in communities. We would like to suggest that Recycle BC consider the proximity to garbage and other recycling disposal

facilities when siting up new or maintaining existing depots. The environmental impact of travelling to those depots should be a deciding factor.

3. Streetscape Collection

We appreciate the incredible amount of work that Recycle BC has undertaken to determine an effective way to collect material from streetscapes, given the extreme difficulties and challenges associated with this material stream. Given that the importance of public participation and confusion in “how recycling is different in public spaces than other areas, we would like to suggest Recycle BC explore to expand the program, invest in technology that could support a more efficient collection system, and to cover the associated cost.

4. Performance Targets

We support moving towards an aligned recovery rate in measuring performance over the offset rate, as the aligned rate shows the true recovery rate. We feel that the program should use the aligned rate in program evaluation, but also show the offset rate in the annual reports to provide current data.

We support the proposal Net Out contamination from recovery rates as this better reflects the recovery of the material.

We feel that the contamination target set for automated collection is too low. A target of 3% could be achieved for manual collection but this is not a realistic target for automated collection. We feel that a target of 5% would be more realistic for automated collection.

5. Landfill Composition Targets

Given that waste composition studies are performed by local governments on a regular basis, and that these studies typically included sector-performance data (i.e., residential packaging), we feel that Recycle BC should incorporate landfill composition audits as part of their program assessment. Consideration should also be given to compensating local governments for the amount of program material entering landfills.

6. Communications

We appreciate and support the communications approach taken by Recycle BC and value the resources provided on the collector’s portal. We suggest that Recycle BC collaborate with and support municipal Communications departments to leverage efforts of achieving the same objectives of reducing contamination and increasing participation.

We appreciate the opportunity to provide feedback on this plan. Feel free to reach out if you like to discuss or clarify any of these suggestions.

7. Agreement

Risk of providing Recycling services must be balanced between municipalities and producers. At this time, our observation shows the plan seems one-sided and could place undue risk on municipal collectors if Recycle BC’s contamination and recycling rate standards aren’t achievable and/or the financial incentives aren’t high enough to cover the cost of meeting the requirements.

We request that Recycle BC update the draft plan to show how producers will assume a more equitable allocation of risk and work collaboratively with municipalities through actions and commitments, and change the agreement accordingly to address some of the common concerns such as:

- Setting realistic and achievable contamination and recycling rates
- Providing fair, long term compensation for municipalities that covers the full cost of achieving Recycle BC's desired contamination and recycling rates
- Providing education to raise awareness and support desired recycling behaviours
- Standardizing collected materials in all settings (residential, Commercial, Public Spaces, etc.)
- Investing in post-collection technology in the event that Recycle BC's expectations for contamination can't be achieved
- Working with other stewards so their recyclable material isn't discounted as contamination

In Closing

Thank you for taking the time to review the feedback from the City of Nanaimo on the Recycle BC Consultation Draft Plan. Please contact Taaj Daliran, Manager, Solid Waste Management [REDACTED] if you have any questions.

January 6, 2023

Recycle BC
405-221 West Esplanade
North Vancouver, BC V7M 3J3

Dear Recycle BC,

RE: Packaging and Paper Product Extended Producer Responsibility Plan – Consultation Draft

The City of Salmon Arm has been participating in the Recycle BC program since 2014 and continues to benefit from the reduction in waste going to landfill that this service provides. Please find herein our feedback on Recycle BC's draft five-year program plan (2023 to 2027).

Section 2.2 Administration

We suggest expanding the Advisory Committee to include membership of zero-waste organizations such as Zero Waste BC and the Circular Innovation Council, as they could bring significant knowledge to the table. It would also be beneficial to invite other municipalities and regional districts in BC so as to get a broader perspective on regional-based issues and challenges. The overall mix of the Advisory Committee membership should be reviewed and adjusted periodically to ensure appropriate representation.

Section 2.4: Program Financing

Producer Members

Section 2.4 indicates that producers have the ability to “choose” to be a member of Recycle BC. We feel it would be beneficial to clarify what this means in terms of producers of PPP that do not choose to be a member of Recycle BC. Some of these may be small producers that, per the Regulation, are not obligated to participate, but are there producers of obligated PPP that are not members of Recycle BC? If so, do they have their own EPR program plan and collection mechanisms in place, or is Recycle BC in conjunction with the MOECC, actively monitoring such producers to ensure they join the Recycle BC program?

Producer Fees

The plan indicates that producers fees cover “an equitable share of Recycle BC administration costs”. Does this infer that it also covers the administration costs of the municipalities that provide collection under contract to Recycle BC, such as is the case in Salmon Arm? Perhaps this point should be stated in the same way as resident awareness costs, without the Recycle BC qualifier – i.e. “an equitable share of administration costs”.

Weight-based Fees

In addition to paying weight-based fees, we believe that there should be a flat-rate base fee that is charged to any producer that puts PPP into the marketplace, regardless of weight. The purpose of this would be to cover the fixed costs of providing collection and processing infrastructure, as well as administration and education costs. In other words, regardless of the weight, if a producer is putting PPP into the marketplace there will be a need for collection, processing, education and administration, and therefore all producers should pay an equal share of these fixed costs.

GHG-emission Offset Fees

Now that Recycle BC is gathering emissions data, producers should be charged an additional fee to pay for carbon offsets or other mechanisms to move Recycle BC's program toward net zero emissions, such as the implementation of zero-emission collection vehicles, post-processing facilities, etc.

Where Recycle BC is not the direct service provider, a portion of these fees could be used to provide additional incentives to municipalities to implement zero-emission solutions in their collection operations. Incentives could be based on year-over-year reductions in GHG emissions reported to Recycle BC.

Fees for Not-Accepted PPP

Fees collected from producers of not-accepted PPP, or a portion of, should be distributed to municipalities to cover the costs of collecting and managing this material in the garbage and landfill streams.

Additionally, if not already the case, these fees should be set significantly higher to further incentivize producers of these materials to change their packaging to that which is accepted in the program and move it higher-up the pollution prevention hierarchy.

Section 3.1: Packaging

Due to the fact that Schedule 5 of the Recycling Regulation does not provide a detailed list of what packaging is obligated or excluded, we believe there are some packaging materials that fall through the cracks in this regard.

For example, in an August 2022 Recycle BC audit of Salmon Arm's recycling, two types of flammable and/or explosive aerosol containers were found, one being an insect repellent spray and the other a rust inhibitor spray. The indication from the Recycle BC audit was that these should not have been put in the recycling due to their potentially hazardous nature. The insect repellent can was completely flat, meaning it was empty and not likely to explode. The rust inhibitor was not flat and the audit did not indicate if it still contained residual liquid.

The problem with these containers is that in Schedule 2 (Residual Product Categories) of the Recycling Regulation, insect repellent is excluded under the pesticide product category and by extension, an empty insect repellent aerosol can would also be excluded. We contacted Product Care about the rust inhibitor and were told that it didn't meet the flash or fire point requirements to qualify under the solvent and flammable liquids category.

The implications here are that these packages are not covered by either the PPP category, nor the residuals product category and due to their potentially hazardous nature should be taken to a hazardous waste depot for disposal. If Recycle BC is collecting fees from the producers of these products then these fees should be provided to municipalities or organizations that run household hazardous waste depots. Alternatively, the Recycling Regulation needs to be amended to include these products in Schedule 2, so that they will be covered by residual product EPR plans.

Section 3.3 Single-use and Packaging-Like Products

With the addition of the single-use and packaging-like products to the Recycling Regulation, there should be a period of leniency granted to collector municipalities with regard to contamination in audits related to these new additions. It will take time to get the public educated on what is and is not accepted when it comes to these materials. Party décor encompasses quite a wide variety of items, so this one may be especially challenging. Although we very much appreciate these additions, they do come with a certain degree of complexity, rather than minimizing complexity. Adding things like paper service ware also opens the door to food waste contamination.

Section 3.4 Sources of Packaging and Paper Product

Streetscape

Page 9 of the Program Plan provides a detailed definition of what comprises streetscape, yet this definition is not in the Recycling Regulation nor the Environmental Management Act. We feel that it would be of value to include an explanation as to how this detailed definition was derived.

The interest in knowing this information is to understand if it could be expanded to include other municipal facilities that would not be classified as industrial, commercial (ICI) or institutional. For example, sports fields, skating rinks, swimming pools, recreation centres, arenas, city halls, etc. Other than “institutional accommodations”, what constitutes an ICI facility does not appear to be defined in either the Recycling Regulation or the Act, so it leaves the question as to what else could be included when it comes to municipal property.

We acknowledge that streetscape or other public-space recycling poses significant challenges, especially related to contamination, however there may be municipal facilities that lend themselves better to manage this than streetscape environments. For example, within an arena or recreation facility, rinsing stations could be provided for the purpose of emptying liquids or rinsing food containers. These facilities could also control the types of packaging sold at concession stands such that they would be more readily rinseable and recyclable, or perhaps even compostable. Additionally, it may be easier to provide appropriate educational materials in these environments, such as information on the package, or information at point of sale and disposal as to how to properly dispose the packaging. Facilities could also potentially provide staff during specific events to assist patrons at the point of disposal. Success has been achieved with this waste station staffing methodology at an annual music festival held in Salmon Arm.

In monitoring the streetscape recycling receptacles in Salmon Arm, we have observed that beverage containers have a very high success rate of being correctly deposited in the right receptacle and there is minimal contamination. However, other PPP recycling, although

deposited in the correct receptacle, is typically take-out food and beverage packaging and is significantly contaminated and ultimately must be disposed of in the garbage. This being the nature of public-space PPP (i.e. take-out food packaging), it is difficult to imagine what could be done differently to reduce food and liquid contamination.

Producer fees that Recycle BC receives for these materials could perhaps be better spent in funding reusable packaging/container pilots or other initiatives that would reduce or eliminate this type of PPP entirely, than spending it on the funding regular collection and processing from streetscapes.

Industrial, Commercial, Institutional (ICI)

It is understood that the Recycling Regulation does not include ICI at this time. That said, there are certainly many ICI facilities that purchase products as residential consumers. Recycle BC would be collecting fees for this PPP from producers. For example, an office may purchase paper from an office supply store and food and beverages from grocery stores or restaurants, or other goods from home supply stores, where the packaging is being funded by producers for recycling. This being the case, this money should be put to use to recover this material through the Recycle BC program, otherwise there could be a significant amount of PPP that is not being captured in your recovery metrics.

City Hall, here in Salmon Arm is a good example. We have a private collector collect a 3 m3 recycling bin on a monthly basis. The vast majority of materials going into this bin are paper, cardboard boxes (many from the purchase of things like computers, monitors, copier toner, etc.) and a large variety of food containers from items purchased for staff, or that people bring into the office to consume. Yes, people could take their personal recycling home for residential recycling, however that is typically not what is done.

We feel that Recycle BC should begin investigating collecting from ICI facilities that generate the same PPP as residential. This should certainly be the case for vacation facilities, retirement homes, long-term care homes etc., where residential-type PPP would be generated. Schools and certain office environments may also be explored as potential options. Pilot projects could be considered and success with these pilots could potentially help expedite the addition of certain ICI sectors to the Recycling Regulation.

Section 4.3 Collection from Residents and Streetscapes

Section 4.3.2 Accepted Materials

Compostable PPP

Salmon Arm has residential food waste collection in place and we educate residents to put food-soiled paper products in the food waste bins, not recycling. We therefore fully support Recycle BC efforts in investigating future overlaps with the OMRR and providing financial incentives to municipalities that have food waste/organics disposal options.

Section 4.3.3 / 4.3.4 Curbside and Multi-family Collection

Appendix B (Eligibility Criteria) requires that curbside garbage collection be in place. We assume that this is to reduce the potential for contamination in recycling (i.e. residents using curbside recycling collection as a means of disposing other non-PPP waste), but it would be beneficial to provide the reason behind this requirement. There may be municipalities or

unincorporated areas where residents don't want to pay for a curbside garbage collection, however they may be open to Recycle BC providing curbside recycling services, funded by producers. Please clarify the reason for the curbside garbage collection.

Section 4.3.8 Financial Incentive Methodology

For municipalities acting as a collection contractor to Recycle BC, please consider adding an annual CPI and/or fuel cost adjustment (based on fuel rack pricing) to the per household incentive rate to ensure inflationary costs are covered.

As mentioned in the Program Financing section, if GHG-emission fees are collected from producers, these in-turn could be used to provide incentives to collector municipalities to implement GHG-emission reducing solutions to their collection operations. Achieving zero-emissions could eliminate the need for annual fuel cost adjustments.

With regard to satellite depots operated in communities that don't meet eligibility criteria, it is not clear as to if these will be funded by Recycle BC. On page 18 it indicates that these will not be included in cost studies. Please clarify if satellite depots will be funded.

Section 4.5 Dispute Resolution

The Recycling Regulation section 5(1)(c)(vi) speaks to the need for a dispute resolution procedure for disputes that arise between producer and person providing services related to collection and management of the product, however the table in this section does not include this as a dispute type. Should it be added?

Section 5.2 Pollution Prevention Hierarchy

Reduction

Despite the fact that the Pollution Prevention Hierarchy (PPH) in the Recycling Regulation does not directly address a general reduction or elimination of packaging entirely, we are pleased to see that Recycle BC's activities include this as an objective, citing the weight-based producer fees as a means by which this can be achieved. As noted in the Program Financing section above, we believe that additional fees need to be added, such as a flat-based (or fixed-cost) fee and GHG-emissions fees, to further incentivize packaging elimination, reduction and energy efficiency.

Reuse

We fully support any efforts by Recycle BC to look at how its reverse supply chain logistics can drive reuse. An example that comes to mind are glass mason jars (such as one you would purchase pasta sauce in). How could these be collected and returned to the producers for washing and reuse? The same could apply to certain types of plastic clam shell containers, (such as those that you would buy peaches in). Could these be returned back to the fruit growers for reuse, or could a more durable reusable fruit package be created? Similar for cardboard shipping boxes for online orders of goods or groceries. Can a common type of generic, durable, reusable box be developed that any producer could use for shipping and can Recycle BC's reverse supply chain get these returned to the producers? These types of reusable containers could be produced from 100% recycled materials.

Recover Material

We would like to note that the production of an engineered fuel should be considered waste-to-energy treatment. There is no difference in having PPP go directly to a waste-to-energy facility compared to first creating an engineered fuel. Ultimately, it is energy recovery, which we believe is a better option than material going into landfill, where no value can be recovered, if options higher up the PPH are not suitable.

Chemical recycling should also be something that is considered and, in our opinion, is a preferred option to waste-to-energy treatment. Chemical recycling can reduce complex polymers to simpler monomers that can then become inputs to new products. This can lead to the ability to infinitely recycle plastics rather than the degradation that can occur over time with mechanical recycling. It is also a better option than shredding flexible plastics and using them in concrete or asphalt, where environmental wear over time will result in micro-plastics entering the environment.

Minimize Complexity and Maximize Recovery

In accordance with Recycle BC's first Program Delivery Principle (focus on outcomes, not process), we fully support minimizing complexity and maximizing recovery. To this end, Recycle BC should be structuring producer fees and working with producers to minimize the different types of packaging put on the market, especially those that residents need to take to a depot, rather than being collected at curbside. The fewer the types of packaging, the easier it is to educate residents on what is and what is not recyclable and the easier it is for residents to recycle where curbside collection exists. The very high recovery rates of paper, glass and metal are strong indicators that residents have a solid understanding that these are recyclable. We need the same success to be achieved with plastic packaging through simplification. The fewer types of packaging would also simplify the post collection processes and finding suitable end-markets as well.

5. Program Performance

5.3.1 Program Recovery Rate

We believe the most recent data available should be used for reporting the program recovery rate, which means continuing to use the offset methodology. That said, can Recycle BC investigate ways of expediting the provision of producer data such that the offset could be reduced to a year, rather than two years? Appendix D shows the aligned data for 2021, which implies that this data was available at the time this 2022 draft program plan was prepared. That being the case, it is an indication that producer data could be received sooner so as to reduce the offset to one year.

If reducing the offset is not feasible, we would suggest providing both sets of data, as is shown in Appendix D – i.e. both the offset and aligned (as it becomes available), for comparison purposes.

5.3.2 Material Category Performance

We note what appears to be a discrepancy between the material category performances and the overall program performance as shown in Appendix D.

In the material category performance comparison of offset and aligned methodologies, the offset methodology results show as higher percentages across all categories, compared to the aligned calculations, especially in 2020 and 2021. For example, paper is 101% compared to 96%, plastic is 55% compared to 48%, metal is 84% compared to 79% and glass is 117% compared to 103%. However, in the overall program performance comparison, the results for 2020 and 2021 are exactly the same at 86% and 94% respectively. One would expect that if the material categories are all higher using the offset calculation that the same would apply to the overall program recovery performance, rather than them being equal.

In summary, we feel that both the program performance and material category performance should use the same calculation methodology (both offset or both aligned), to provide apples-to-apples comparisons. It would be beneficial for annual reports to show both offset and aligned graphs, similar to what has been done in Appendix D. This would provide a more complete and accurate picture over time, as well as highlighting any anomalies such as may have occurred during the pandemic.

With regard to material category recovery rates, we feel an explanation is required as to why glass exceeds 100%, even with the aligned data, which was 103% in 2021. Additionally, it would be beneficial to know why glass recovery is so successful and how other materials could achieve this level of success. For example, considering its value and purported infinite recyclability, metal is a material for which a higher level of success should be targeted than 89%. It would be nice to see this approaching 100% by 2027.

With regard to plastics, we believe that other strategies need to be employed to drive-up the recovery of these materials. Packaging simplification (such as following the CPP golden design rules), shifting to more durable reusable packages, and reduction or elimination of materials that have to be taken to the depot rather than being recyclable at curbside, are some suggestions. The fewer the types of packaging materials on the market, the easier it is to educate consumers and

Appendix E – Pollution Prevention Hierarchy Target

The Recycling Regulation only stipulates a collection recovery rate (i.e. 75%) but not a target rate for the quantity of this collected material that should be diverted from landfill. As such, we appreciate that Recycle BC has included such a target in Appendix E (i.e. 85% to 90%). We feel that it would be beneficial to see this be more specifically defined on a year-by-year basis, similar to the collection recovery rate, whereby there would be year-over-year improvements.

In conclusion, we sincerely hope that this new program plan will serve to “push the envelope” and drive significant change in PPP design so that first and foremost it reduces the amount being sold into the marketplace that subsequently need to be collected and processed, and secondly, that minimizing complexity and maximizing efficiency is kept foremost in mind.

Producer fee structures should ensure all costs are fully covered, not just for collection, processing, administration and education but also for the GHG emissions associated with these activities. Implementation of such would have a greater positive impact when it comes to overall environmental protection of recycling in BC.

It was inspiring at the Recycle BC Collector Conference in October 2022 to hear about the work being done by Loblaws to conform their packaging to the CPP Golden Design Rules and it would be wonderful to have more producers moving in this direction.

We appreciate you considering our feedback in the finalization of this plan.

Sincerely,

Jon Mills

A handwritten signature in black ink, appearing to read 'JM' or 'Jon Mills', written in a cursive style.

Engineering Assistant
City of Salmon Arm

cc. Gabriel Bau Baiges, City Engineer



City of Trail

Office of the Mayor

22 December 2022

Recycle BC
405-221 West Esplanade
North Vancouver, BC

Sent by email: consultation@recyclebc.ca

Dear Sir/Madam:

**RE: COMMENTS ON RECYCLE BC PACKAGING AND PRINTED PAPER EXTENDED
PRODUCER RESPONSIBILITY PLAN – CONSULTATION DRAFT, SEPTEMBER 29, 2022**

On behalf of Trail City Council, I am writing this letter to lend our support to the comments and serious concerns that the RDKB has outlined in their attached letter regarding the review of the Packaging and Printed Paper Extended Producer Responsibility Plan – Consultation Draft of September 29, 2022. Of particular concern is the fear that based on the proposed new criteria that two Recycle BC depots in our Regional District are at risk of being eliminated once the existing agreements expire. These depots are a valuable service for our rural communities and their loss would be hardship on the residents in the Regional District and set our area back on meeting the waste reduction and zero waste goals.

Thank you for your consideration.

Sincerely,

Colleen Jones
Mayor

cc: Mark Andison, CAO, RDKB
Janine Dougall, General Manager of Environmental Services
Roly Russell, MLA – Boundary Similkameen
Katrine Conroy, MLA – Kootenay West
Ministry of Environment and Climate Change
(Email: extendedproducerresponsibility@gov.bc.ca)



TO: Recycle BC

FROM: City of Vancouver

RE: Packaging and Paper Product Extended Producer Responsibility Plan: Consultation Draft (September 29, 2022)

VIA EMAIL: consultation@recyclebc.ca

DATE: Dec. 20, 2022

Thank you for the opportunity to provide feedback on Recycle BC's *Packaging and Paper Product Extended Producer Responsibility Plan: Consultation Draft (September 29, 2022)*.

Extended producer responsibility (EPR) programs play a key role in the City of Vancouver's ability to achieve the goal of zero waste by 2040, contribute to cleaner and safer streets and other public spaces, and support a circular economy.

Staff offer these comments:

SUMMARY:

- **Targets and material category performance:** We support the plan to make program recovery targets net of non-PPP beginning in the 2023 annual report. We also support the material category performance targets.
- **Curbside and multi-family collection:** We support Recycle BC's ongoing plans for curbside and multi-family collection, particularly the provisions to provide direct collection.
- **Integrated Recycle BC Collection services:** We suggest Recycle BC update this section to clarify that Recycle BC will honour and renew existing depot agreements that do meet the criteria for eligible collectors in Appendix C. To support a circular economy and zero waste, we also suggest Recycle BC update this section to take into account proximity to other recycling and garbage disposal locations when deciding to approve or maintain depot locations.
- **Streetscape recycling:** We disagree with statements in the draft plan that suggest streetscape recycling programs have extremely high contamination, unacceptably high greenhouse gas emissions, poor environmental outcomes, and are not aligned with the Clean BC strategy. The City of Vancouver has demonstrated proof of concept—it's time producers move forward. We can't comment on the feasibility of the proposed streetscape plan until Recycle BC publishes, and consults on, the contamination and recycling rate standards and the financial incentive mentioned in the draft plan. However, at this time, we ask Recycle BC to add more actions to balance the risks equitably between producers and municipalities, and commit to collaborating with municipalities and provide assurance of a permanent program. We've listed these actions in the detailed comments. We simply can't accept the argument that streetscape recycling is too difficult. Developing solutions to challenges and a commitment to continuous improvement is standard with every public facing program, and must be accepted by producers as a mandatory component of any current or new program being developed under the Recycling Regulation.

- **Program financing and producer fee setting methodology.** We agree with the principle that all obligated materials should bear a fair share of the costs to manage the package and paper product program, irrespective of whether a material is collected (page 6). However, we disagree with using producer fees from non-recyclable PPP and single-use items to offset costs for recyclable PPP. This is not the intent of EPR. The producer fee setting methodology would be more effective and truer to EPR if Recycle BC committed all fees from each type of non-recyclable PPP and single-use item to dedicated reserves and invested them in research and development, end market development, promotion, education, and other initiatives to move non-recyclable PPP up the pollution prevention hierarchy.
- **Communications:** We generally support the communications approach outlined in the draft plan. Recycle BC may wish to update the list of strategies on page 21 to include collaboration and alignment with municipal solid waste communications.

DETAILED COMMENTS

Targets and performance (sections 5.3.1 and 5.3.2)

- We support the plan to make program recovery targets net of non-PPP beginning in the 2023 report, as described in section 5.3.1. This is a more transparent and accurate metric that will improve stakeholder understanding and inform appropriate policy, service levels, and program expansion.
- We also support the material category performance targets in section 5.3.2.

Curbside and multi-family collection (sections 4.3.3 and 4.3.4)

- We support Recycle BC's ongoing plans for curbside and multi-family collection, particularly the provisions to provide direct collection. Since 2016, Recycle BC provides direct collection to all residential curbside and multi-family residences in Vancouver with the costs covered by producers, not ratepayers. This approach is working well in Vancouver.

Integrated Recycle BC collection services (section 4.3.5)

- We suggest Recycle BC update this section to clearly state that Recycle BC will honour and renew existing depot agreements that do meet the criteria for eligible collectors in Appendix C. The plan doesn't explicitly say this. Instead, it discusses scenarios where Recycle BC may honour but not renew agreements that do not meet the criteria.
- We also suggest Recycle BC update this section to take into account proximity to other recycling and garbage disposal locations when deciding to approve or maintain depot locations. Co-locating Recycle BC's PPP depot collection with other recycling depot services and disposal facilities gives residents "one stop drop" convenience and diversion opportunities, and supports the circular economy and zero waste.

Streetscape recycling (section 4.3.7)

- **The City of Vancouver has demonstrated proof of concept—it's time producers move forward.** We disagree with statements in the draft plan that suggest streetscape recycling programs have extremely high contamination, unacceptably high greenhouse gas emissions,

poor environmental outcomes, and are not aligned with the Clean BC strategy. The City of Vancouver has shown leadership by investing over \$500,000 in taxpayer-funded capital, and \$230,000 in annual operating costs, to develop a successful streetscape program that diverts collected materials to recycling. Producers are responsible for collecting streetscape PPP under the Recycling Regulation and must do so without further delay to relieve taxpayers and support a circular economy.

- **Risk must be balanced between municipalities and producers.** We can't comment on the feasibility of the proposed streetscape recycling plan until Recycle BC publishes, and consults on, the detailed contamination and recycling rate requirements and financial incentives for municipalities mentioned in the draft plan. However, at this time, our observation is the plan seems one-sided and could place undue risk on municipal collectors if Recycle BC's contamination and recycling rate standards aren't achievable and/or the financial incentives aren't high enough to cover the cost of meeting the requirements. We request that Recycle BC update the draft plan to show how producers will assume a more equitable allocation of risk and work collaboratively with municipalities through actions and commitments such as:
 - Setting realistic and achievable contamination and recycling rates
 - Providing fair, long term compensation for municipalities that covers the full cost of achieving Recycle BC's desired contamination and recycling rates
 - Providing education to raise awareness and support desired recycling behaviours
 - Standardizing collected materials
 - Investing in post-collection technology in the event that Recycle BC's expectations for contamination can't be achieved on the collection side of the equation
 - Working with other stewards so their recyclable material isn't discounted as contamination
- **Other stewards' recyclable material shouldn't be discounted as contamination.** On page 17, Recycle BC says its service and funding commitments for streetscape recycling will not cover materials that fall under the responsibility of other stewardship programs. This seems inconsistent with the approach for curbside and multi-family collection. We request that Recycle BC work with other stewards to come up with the necessary arrangements to count the material towards each programs' respective recovery rates, with proportionate funding from each stewardship program. Counting this as contamination will put further risk on municipalities and is contrary to objectives of the Clean BC Plastics Action Plan, the circular economy, and zero waste.
- **The need for producers to collaborate and provide assurance of a permanent program.** Since the first joint City of Vancouver - Recycle BC streetscape recycling pilot in 2016, we have contributed a significant level of effort and consistently shown a willingness to working with Recycle BC. We simply can't accept the argument that streetscapes recycling is too difficult. Developing solutions to challenges and a commitment to continuous improvement is standard with every public facing program, and must be accepted by producers as a mandatory component of any current or new program being developed under the Recycling Regulation.

Program financing and producer fee setting methodology (section 2.4)

We agree with the principle that all obligated materials should bear a fair share of the costs to manage the package and paper product program, irrespective of whether a material is collected (page 6).

However, we disagree with using producer fees from non-recyclable PPP and single-use items to offset costs for recyclable PPP. In our view, producers of non-recyclable material shouldn't subsidize or get credit for recycling other materials when their material flows to landfills and incinerators.

Subsidizing producers of recyclable PPP with fees from non-recyclable materials dilutes these Recycle BC principles (page 6):

- *The management costs allocated to each material should reflect the material's impact on the costs to collect and manage it in the recycling system because a material's unique characteristics can drive costs in distinctive ways*
- *The commodity revenue should be attributed only to the materials that earn revenue because materials that are marketed have value and should benefit from the earned revenue*

Finally, using fees from non-recyclable materials to subsidize recycling still burdens local governments and ratepayers with the cost of collecting non-recyclable PPP in the garbage.

The plan does mention the fee setting methodology includes a mechanism to add cost to uncollectable and/or underperforming PPP to invest in research and development, end market development, promotion and education (page 7). However, this mechanism would be more effective if Recycle BC committed all fees from each type of non-recyclable PPP and single-use item to dedicated reserves aimed at research and development, end market development, promotion, education, and other initiatives to move non-recyclable PPP up the pollution prevention hierarchy.

Communications

We generally support the communications approach outlined in the draft plan. Recycle BC may wish to update the list of strategies on page 21 to include collaboration and alignment with municipal solid waste communications. This is an important part of our partnership with Recycle BC and generally works well in the City of Vancouver.

In Closing

Thank you for taking the time to review the feedback from the City of Vancouver on the Recycle BC Consultation Draft Plan. Please contact Albert Shamess, Director, Solid Waste Management & Green Operations [REDACTED] if you have any questions.

January 5, 2023

[REDACTED]
Executive Director, Recycle BC
220 – 171 Esplanade Way
North Vancouver, BC V7M 3J9

RE: RECYCLE BC DRAFT PROGRAM PLAN

Thank you for the opportunity to provide feedback on Recycle BC's draft packaging and printed paper (PPP) extended producer responsibility plan. The City of Victoria has set ambitious targets to manage waste more sustainably - goals that align with several of the objectives of the proposed Recycle BC plan.

City staff commend Recycle BC for its continued successful operation of the only full extended producer responsibility (EPR) program for residential packaging and paper product (PPP) in Canada, resulting in a recovery rate of 86% of collected material managed by recycling.

While reduction and reuse are at the top of the waste prevention hierarchy, City staff recognize improving recycling programs for products that can no longer be used is an important component to mitigate negative impacts to the environment and our community.

The comments in this response letter are guided by *Zero Waste Victoria*; the City of Victoria's long-term plan for waste reduction.

The City of Victoria staff feedback herein is focused on four areas for Recycle BC's consideration that would result in substantially improved recycling performance across the city and other urban centres in British Columbia:

- Multi-family collection service levels
- Access to depots for accepted PPP material
- Streetscape recycling
- Collection and management of compostable PPP

MULTI-FAMILY RESIDENTIAL COLLECTION

Multi-family waste diversion is a top priority for waste reduction in the City of Victoria.

More than 33,000 households in the city do not receive Recycle BC funded blue box recycling because of Victoria's household composition with 60% of residents living in multi-family residential buildings.

The share of people living in multi-family buildings in Victoria and other urban centres in British Columbia is expected to grow. Between 2011 and 2021, most of the City of Victoria's 15 percent population increase was housed in newly constructed high-density condominiums.

It is important for Recycle BC to enhance their program for multi-family recycling to provide BC residents with equitable access to these environmental services.

During the consultation for the proposed plan, Recycle BC indicated that they are actively recruiting new multi-family collectors within eligible service areas, however specific details regarding an improved recruitment approach were not stated, nor is it clearly stated in the proposed plan. The only activities mentioned are the annual review of multi-family household participation and expansion of multi-family service through financial incentive offers to qualified multi-family collectors.

Additionally, Recycle BC reported that combined loads collected from mixed-use commercial/multi-family residential buildings has been identified as the biggest barrier to private haulers signing on, stating that separating the ICI and residential streams would be challenging and cost-prohibitive to the haulers. However, separating residential loads from commercial loads during collection is not currently a requirement in Recycle BC's Collector Qualification Standards that have not been updated since 2013.

During consultation for previous program plans, feedback has regularly been given from private collectors and local governments that the payment structure for incentives and proposed increases are too low and favour a single-stream collection system, which historically results in higher contamination rates as compared to a multi-stream system.

Feedback also indicated that incentive rates do not reflect the many challenges to collection from multi-family residences such as the higher turnover rate of residents in multi-family buildings resulting in higher costs for promotion and education needed to reduce contamination levels.

While Victoria staff are pleased to see that Recycle BC will report a suite of metrics annually for multi-family expansion, we encourage stronger program commitments to improve the equity of stewardship PPP recycling services as follows:

- **Include a separate and specific multi-family collection target to better address the gaps in materials collected from this sector.**
- **Update the *Collector Qualification Standards* to include specific requirements for collection from mixed-use commercial-residential buildings.**
- **Align the incentives for multi-family residential collection to a level that results in an increase in uptake by haulers.**
- **Provide research and best practice guidelines for haulers, strata councils, landlords and property managers servicing multi-family households.**

DEPOT ACCESS

Recycle BC's depot recycling access needs to consider trends and changes in transportation mode-share in urban centres.

The City of Victoria's Sustainable Mobility Strategy has set a target to reduce average vehicle ownership per household by 30% from 2017 levels and for 55% of all trips made to, from and within Victoria to be by walking, rolling, or cycling by 2030. To align with these targets, depots

need to be provided in locations that ensure they are accessible to households without access to a vehicle, particularly in the downtown core where people increasingly rely on active transportation and transit.

Currently, there is only one location (London Drugs) within the City of Victoria that will accept PPP materials not collected through curbside and multi-family service. London Drugs accepts foam packaging, plastic bags and overwrap, and other flexible plastic, however, there is a limit of one grocery bag per material per person for the categories of accepted PPP. Residents wishing to recycle higher volumes of these PPP materials must travel to a depot outside the city.

During the proposed program plan consultation, Recycle BC indicated plans to site a depot in the City of Victoria within the next 1-2 years, confirming that upon program plan approval they will move forward in recruiting additional collection partners.

To improve depot access and accountability Victoria staff encourage Recycle BC to:

- **Assess and report depot access at a municipal and regional level.**
- **Work with City of Victoria staff to coordinate and expedite the delivery of a new depot that would best serve Victoria residents.**

STREETSCAPE RECYCLING

The City of Victoria and several other BC municipalities operate successful streetscape recycling collection programs where recyclable materials are correctly sorted and sent to local material recovery facilities for recycling.

The City of Victoria has invested more than \$225,000 in capital funds towards new infrastructure to enhance streetscape recycling and given its success, will increase its *Zero Waste Streets* capital program by \$800,000 over the next several years.

The new streetscape receptacles introduced across the public realm are based directly on the outcomes of the Recycle BC-led consultations with local governments and published Recycle BC reports summarizing best practices. The City's program successfully diverts approximately 60% of waste collected in these multi-stream stations from the landfill to composting and recycling facilities.

In January 2021, City staff wrote a letter to the MOECCS expressing concerns and providing recommendations related to the deferral of the Recycle BC streetscape/on-street recycling initiative. City of Victoria staff were active participants in the Recycle BC Streetscape Recycling Roundtable Series in 2019 and the outcomes of that dialogue have directly informed changes to the City's streetscape recycling program.

Recycle BC has cited cost escalations as a justification for not recycling packaging and paper products collected in the public realm. This contradicts the objective of extended producer responsibility. The rising costs mentioned by Recycle BC reflect the full lifecycle management costs of packaging and paper products. Providing industry relief of these costs places the financial burden for the collection of these materials directly on local governments.

Additionally, Recycle BC's position on streetscape collection is inconsistent with the *Recycling Regulation* requirements for producers to develop a plan to collect PPP from municipal property including public roadways and public parks.

At this point, it is reasonable to request that Recycle BC meet the commitments under their approved Extended Producer Responsibility Plan and introduce a program for streetscape recycling.

City of Victoria staff encourage Recycle BC to promptly advance on a clear and permanent offering for streetscape recycling that would offset the operational costs to local governments running successful programs.

COMPOSTABLE PPP

Compostable plastics have been recently identified as a problematic material contaminating and compromising both recycling and composting streams.

In the proposed plan, Recycle BC indicates that revisions to the Organic Matter Recycling Regulation (OMRR) will guide the development of financial incentives to promote the management of appropriate types of PPP in the organic waste stream. Additionally, they indicate that outcomes of this process will also serve to guide Recycle BC members' decisions to incorporate compostable material into the design of their packaging and paper formats.

In June 2022, the province released their *Organic Matter Recycling Regulation Project Update* indicating that they will not be adding compostable plastics to Schedule 12 as an allowable feedstock for compost, unless by Director approval under a specific set of operational criteria yet to be defined. This decision was made as a result of stakeholder feedback and information from other jurisdictions indicating that even if plastic is certified as compostable, it may not fully decompose successfully at compost facilities resulting in plastic contamination.

Ministry staff have also indicated that soiled paper fibre as an acceptable feedstock will be considered under certain criteria outlined in a guidance document in 2023 that will accompany the amended OMRR. They intend to develop guidelines for the potential acceptance of non-coated paper products as feedstock.

In the proposed plan, Recycle BC does not appear to recognize and acknowledge this update.

Given that the planned regulatory amendments to the OMRR have been announced and Recycle BC now has clear direction on what PPP products are appropriate for organic recycling through residential organics collection and commercial compost facility processing, City of Victoria staff encourage Recycle BC to:

- **Commit to their responsibility for compostable PPP.**
- **State how compostable plastic products will be considered in the proposed plan given their restriction as a feedstock for composting.**

CONCLUDING REMARKS

City of Victoria staff would like to thank Recycle BC for the opportunity to provide feedback on the draft Packaging and Paper Product (PPP) Extended Producer Responsibility Plan.

The City of Victoria staff feedback provided in this letter is intended to provide Recycle BC with considerations that will improve the performance of recycling in growing urban centres and provide equitable recycling services to BC residents.

Thank you for considering our input. As always, City staff would be happy to provide more information as you progress through this consultation process.

Sincerely,



Philip Bellefontaine
Director, Engineering and Public Works
City of Victoria

- c. Bob McDonald, Director, Extended Producer Responsibility, ENV
 [REDACTED] Western Canada Director, Recycle BC
 William Doyle, Assistant Director, Public Works, City of Victoria
 Rory Tooke, Manager, Sustainability, Assets and Support Services, City of Victoria

December 30, 2022

Recycle BC
405-221 West Esplanade
North Vancouver, BC

Dear Recycle BC:

RE: Packaging and Paper Product Extended Producer Responsibility Plan – Consultation
Draft September 29, 2022

Thank you for the opportunity to provide feedback on Recycle BC's draft Packaging and Paper Product Extended Producer Responsibility Plan. The City of Kamloops (the City) joined Recycle BC as a collector under this program in 2017. We appreciate the value that this program provides to our community and the role that EPR programs play in helping us achieve our waste reduction targets.

Our feedback is summarized as follows:

1. **Program Financing.** We appreciate the complex nature of determining producer costs and we support the fee setting methodology that adds costs to uncollected or underperforming material categories to drive advancement along the pollution prevention hierarchy. As the volume of flexible PPP seems to be increasing over time, we would like to see Recycle BC leverage this methodology to help further influence producer packaging choices away from harder to recycle packaging such as flexible plastics.
2. **Sources of Packaging and Paper Product.** We understand that residential premises are defined in the provincial Recycling Regulation and therefore Recycle BC does not have the authority to change this definition. We feel that accommodations where people reside should all be included as residential, whether there is care or services provided or not. Prior to joining the Recycle BC program, the City collected recycling from many student accommodations and care facilities under our multi-family collection program and feel strongly that these locations should be included in the Recycle BC program.

In reviewing audit reports supplied by Recycle BC, "not accepted PPP" is included in the total not-accepted material contamination category, however this material is packaging and should be moved from the not accepted material category to the incompatible material category so that it doesn't count towards a service level failure credit score.

3. **Integrated Recycle BC Collection Services.** We understand that there are many considerations with ICS and with siting depots in communities. We would like to see

Recycle BC consider the proximity to garbage and other recycling disposal facilities when siting new or maintaining existing depots.

4. **Streetscape Collection.** We appreciate the incredible amount of work that Recycle BC has undertaken to determine an effective way to collect material from streetscape given the extreme difficulties and challenges associated with this material stream. Given that the volume of collection is extremely low resulting in very high greenhouse gas emissions, we would like to suggest Recycle BC explore how technology could support a more efficient collection system. Delivering segregated loads of streetscape material does not make economic or environmental sense in our community. As a possible solution for communities the size and structure of Kamloops, would Recycle BC possibly consider co-mingled loads of multi-family and streetscape material?
5. **Financial Incentive Process.** We understand that contamination has a strong impact on Recycle BC's ability to market collected materials, however based on the results of the most recent cost study, Recycle BC is not covering the average cost for collection. The plan states that inflation is part of the analysis, but with the lagging nature of the study using 2019 cost data to set rates for 2022 – 2025, and the impact of inflation on collector costs, we feel that program incentives need to cover at least the average collection costs, with consideration for increasing incentives to account for inflation.

Considering that multi-stream collection provides for a much more marketable material, then consideration should be given to incentivise collectors to move towards multi-stream models. The current difference in collector compensation rates is not substantial enough to justify a transition from single to multi-stream collection given the costs of such a transition. The City suggests Recycle BC investigate what an incentive could look like to shift collectors from single to multi-stream collection.

6. **Pollution Prevention Hierarchy.** We appreciate that BC is a small piece of the market for many of its producers and that actions taken by Recycle BC may not be significant enough to influence packaging design or material choice. We hope as other provinces implement EPR for packaging we start to see some real shifts. We support ongoing review of producer fee structure in sending the right signals to producers that will result in an increase in the recyclability of their packaging choices. We encourage Recycle BC to continue taking an active role in exploring how to support packaging reuse and how reverse supply chain networks can be incorporated into the program.
7. **Performance Targets.** We support moving towards an aligned recovery rate in measuring performance over the offset rate, as the aligned rate shows the true recovery rate. We feel that the program should use the aligned rate in program evaluation, but also show the offset rate in the annual reports to provide current data. We support the proposal net out contamination from recovery rates as this better reflects the recovery of the material.
8. **Material Performance Targets.** We support using the proposed aligned recovery rate in measuring material performance. We also support the material category

performance methodology that kicks-in to re-calculate targets if a material reaches its performance targets for two consecutive years. We feel that the proposed targets for plastics could be increased, specifically for the flexible category considering the increasing shift towards this type of packaging in the market.

9. **Landfill Composition Targets.** Given that waste composition studies are performed by local governments on a regular basis, and that these studies typically included sector-performance data (i.e., residential packaging), we feel that Recycle BC should incorporate landfill composition audits as part of their program assessment. Consideration should also be given to compensating local governments for the amount of program material entering landfills.
10. **Communications.** We appreciate and support the communications approach taken by Recycle BC and value the resources provided on the collector's portal. We suggest that Recycle BC collaborate with municipal communications departments to leverage efforts of achieving the same objectives of reducing contamination and increasing participation.

We appreciate the opportunity to provide feedback on this plan. Feel free to reach out if you like to discuss or clarify any of these suggestions.

Sincerely,

Marcia Dick



Solid Waste Reduction Coordinator
City of Kamloops

File: 5360-04

January 6, 2023

VIA EMAIL: consultation@recyclebc.ca
extendedproducerresponsibility@gov.bc.ca

Recycle BC
405-221 West Esplanade
North Vancouver, BC

Re: Comments on the Consultation Draft of Recycle BC's Packaging
and Paper Product Extended Producer Responsibility Plan

Thank you for the opportunity to comment on Recycle BC's new draft Program Plan. The Cariboo Regional District (Cariboo RD) operates 32 refuse sites over 80,252 square kilometers to provide waste disposal services for its dispersed population. Recycle BC depots are located at Cariboo RD refuse sites that service the greatest number of residents, and in some remote locations to provide isolated communities and First Nations with options for recycling.

The Cariboo RD was an early adopter and supporter of the Multi Materials BC program and is currently a collector of Packaging and Paper Products (PPP) for Recycle BC at 14 depots and one curbside location. Seven of these depots accept First Nation generated PPP as permitted in our First Nations Consolidation Pilot agreement with Recycle BC. We also supported the City of Williams Lake and the District of 100 Mile House to become curbside collectors for Recycle BC.

We have provided extensive comments on the proposed plan, in the hopes that Recycle BC can reconsider its approach and better reflect the needs of rural area and First Nation residents in its Program Plan. The draft Program Plan, in its current form, will severely impact the Cariboo RD's residents and services as we seek to increase the amount of material that is being recycled and diverted from landfills. Our recommendations are provided with an aim to ensuring that Recycle BC's vision of being "a recycling leader, inspiring and accelerating innovation in recycling technology, waste reduction, and packaging design" can be upheld and advanced.

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1. Community Eligibility Criteria

We are deeply disturbed to learn that, under the proposed Community Eligibility Criteria for “Small Communities” (Appendix C of the Program Plan), twelve of the Cariboo RD’s depots including six of the depots that provide service to First Nation communities, would no longer be eligible for Recycle BC Collection Service. These twelve depots generate approximately half of the annual PPP depot tonnes from the Cariboo RD and provide service to 40% of our Region’s electoral area population. The program would be moving in the wrong direction if Recycle BC were to discontinue the operation of these twelve depots, which were established and operated in good faith by the Cariboo RD for the past eight years.

If existing PPP depots are removed from the collection network, the vast majority of depot users would not travel up to 40 km to a depot located in a municipality to recycle. This in turn will drastically increase the PPP tonnes being directed to landfills in the Cariboo RD and decrease the recovered PPP tonnes collected by Recycle BC – a step backwards in meeting provincial solid waste diversion targets and Recycle BC’s recovery targets.

Further, the private and regional district operated depots within municipalities are currently at maximum capacity for parking and storage. Any increase in use would degrade the accessibility and convenience of these central depots and negatively impact the experience for all users. These outcomes are contrary to the first delivery principle of the draft program plan: **“Focus on outcomes, not process** – maximize recovery, maximize efficiency, and enhance resident service levels while minimizing complexity” (Section 4.1 Program Delivery Principles).

Page 4 of the Program Plan also states that Recycle BC’s program provides a “best-in-class model” and that it provides “focused, convenient recycling solutions to BC residents”. Discontinuing the operation of existing depots does not support these claims and would generate negative public attention directed at the Cariboo RD, Recycle BC and the Ministry of Environment and Climate Change Strategy. Recycle BC already recognizes the negative public perception about the Province’s ability to meet public expectations for plastics recycling (Section 1 Revised Program Plan Context). Reducing the ability of rural residents to participate in waste reduction efforts only serves to compound the perception that BC is not able to recycle its materials properly.

The Cariboo RD requests that the draft Program Plan be revised to include firm commitments to continue the eligibility of existing Recycle BC depots beyond current contract/agreement terms.

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2. PPP Recycling in Schools

Section 3.4 Sources of Packaging and Paper Products references the recycling regulation definition of “residential premises” which excludes vacation facilities, rental properties, ski resorts, nursing homes, and other semi-residential facilities with an institutional or commercial purpose. Schools are not mentioned in this definition. **If schools are not specifically listed in the Recycling Regulation as non residential, the Cariboo RD requests that Recycle BC include PPP generated in schools into the Program Plan.** Children are our future recyclers and deserve access to the knowledge of how to recycle properly, which would be best taught by implementing PPP recycling in schools. This initiative will only benefit Recycle BC’s program in the long term by strengthening a culture of recycling and waste diversion. **If piloting school PPP collection will aid in this process, the Cariboo RD requests to participate.**

3. Pollution Prevention Hierarchy

Several sections of the Program Plan discuss strategies to ensure materials advance upwards along the pollution prevention hierarchy, but no targets or commitments are made. There is also no mention of goals to reduce the amount of PPP generated by Recycle BC’s producers. The Cariboo RD recognizes that the Recycling Regulation does not stipulate establishing targets, goals or tracking related to either of these shifts. **However, the Cariboo RD encourages Recycle BC to establish a baseline that performance can be measured against.** Such performance measures reported in subsequent annual reports would show that progress is indeed being made by Recycle BC’s producers to reduce the amount of packaging being used and that the remaining packaging is as reusable or recyclable as possible.

4. Financial Incentives & Penalties

It is unclear if section 4.3.8 Financial Incentive Methodology or the 2024 Collection Cost Study will take into account the cost of curbside audits or the costs of Service Level Failure Credits. **The Cariboo RD requests that the Program Plan and future Collection Cost Studies clearly recognize and account for the costs associated with curbside audits; promotion and education activities; and executed Service Level Failure Credits for local governments.**

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Recycle BC's 2022 enforcement of Service Level Failure Credits will have more local governments considering Direct Service, as per load fines of up to \$5,000 could quickly consume the incentives paid by Recycle BC. However, this will be made far more difficult due to the Direct Service transition criteria listed in Appendix B, specifically the requirement that a minimum of 90 kilograms of PPP per curbside household was collected in the previous year. This criteria ensures that some local government operated collection areas will never qualify for Direct Service and leave those local governments with a choice of a financially unfeasible service or increasing the amount of waste directed to landfills.

This raises several questions for the Cariboo RD which we are seeking answers to:

1. **Is 90 kg of PPP in the previous year based on a target, or actual tonnes collected in Direct Service curbside programs?**
2. **If it is a target, how does it compare with actual Direct Service tonnes collected?**
3. **If it is based on actual Direct Service tonnes collected, is it a provincial average?**

The Cariboo RD recently looked at curbside PPP tonnes collected within its member municipalities and the City of Prince George. Prince George and the City of Quesnel both have Direct Service from Recycle BC and, using the information available from Recycle BC's 2021 annual report and Census 2021 data, both direct service communities appear to have generated less than 90 kg of PPP per curbside household in 2021. If this assessment is incorrect, please provide the Cariboo RD with the accurate information. If this assessment is, however, correct, it demonstrates that in some regions of the province Recycle BC's direct services cannot achieve its own criteria. **We request that the transition requirements for local governments be comparable to what is being achieved by Recycle BC's direct services in the same region of the province.**

Curbside and depot SOW agreements and their Service Level Failure Credits are not discussed in the Program Plan. The Cariboo RD and several other local governments are concerned with the administration of Service Level Failure Credits, the attainability of 3% contamination rate for recovered materials, and the financial impacts of Service Level Failure Credits on the feasibility of recycling collection services. **The Cariboo RD further requests that Recycle BC provides an opportunity in advance of the renewal of curbside and depot SOW agreements to engage and negotiate with collectors on the terms within these agreements.**

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5. Proposed Performance Targets

Appendix D – Proposed Performance Targets indicates that aligned recovery rates will be used going forward, which is supported by the Cariboo RD; however, each annual report should include the available data for the last two years, i.e., the collected tonnes should be presented, and only the supplied quantities should lag. **Two years is an excessive delay for the supply data, and it is recommended that Recycle BC commit to exploring options to reduce the lag to only one year.**

The Cariboo RD is also in support of excluding the 5% non-PPP from the recovery rates. This does raise further questions in the design of the Program Plan and resulting performance targets, which we are seeking answers to:

4. How much of the annually recovered material is PPP, but “not accepted” PPP, as opposed to non-obligated materials?
5. Does the “not accepted” PPP fall into the non-PPP category, or is it included as “recovered” material?

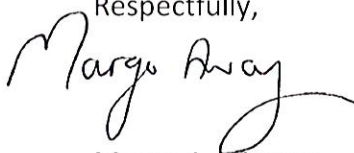
Summary

Thank you again for the opportunity to comment on Recycle BC’s proposed Program Plan. We noted that the words “efficient and effective” were used throughout the Program Plan and framed the context for the plan’s presentation. While these are laudable goals which any program should strive for, these goals should not supersede the responsibility for producers to manage their materials and provide fair and reasonable recycling access to regional district and First Nation residents of BC.

We trust that the feedback, recommendations, and requests presented within this letter will be carefully considered by Recycle BC. We trust that Recycle BC will reconsider its approach and revise the draft Program Plan to better reflect the needs of rural area and First Nation residents in its Program Plan to support the achievement of Recycle BC’s vision and service delivery objectives going forward.

We would appreciate the opportunity to provide any further clarification or commentary deemed necessary by Recycle BC. For this purpose, please contact Tera Grady, Supervisor of Solid Waste Management, for further information at [REDACTED]

Respectfully,



Margo A. Wagner
Chair

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4.1 Program Delivery Principles

- More emphasis is required in the plan to push for *maximize recovery, maximize efficiency, and enhance resident service levels while minimizing complexity*. The focus for Recycle BC is on the larger centers because that is the greater outcome for collection, but rural areas need to be considered for the innovation in collection and diversion.
- To maximize recovery rates there needs to be easy access for residents. With the proposed draft criteria for the integration collection service depots with the scheduled depots slated to be out of the criteria this would force residents to drive further to a depot and will reduce participation and increase recycling entering the waste stream. More details in Integrated section.
- In terms of innovation, more details in the plan are required on how Recycle BC will be expanding and growing innovation. As an organization strive to expand and work with producers to only provide recyclable packaging into the BC market. Work with other organizations to utilize information on packaging (How2recycle.info).
- Currently super sacks that are no longer useable are placed in landfills throughout the province. There is no tracking on the number of bags that are being landfilled. For the section on innovation there needs to be a commitment from Recycle BC to stop the practice of super sacks going to landfill and having GFL provide reverse logistics to have them recycled.

4.2 Program Delivery Overview

- A greater emphasis in the plan needs to be placed the program delivery overview. Since the new hauler/processor contract was signed there has been no opportunities to increase efficiencies and effectiveness of the collection network. The plan needs to include provisions that allows for Recycle BC, the collector and hauler/processor to meet and discuss efficiencies. Currently there is no interaction with GFL who holds the contract for the collectors.
- Currently there is no formal complaint tracking process if there are challenges with the GFL contracted hauler and no recourse for repeat complaints/challenges. There needs to be language in the plan to integrate Recycle BC and GFL monitoring of the contracted haulers and conduct site visits and ride along to ensure contracted collectors are performing up to Recycle BC standards and are meeting contract obligations.
- The CSRD spends a considerable amount of staff time and resources managing GFL and their interactions with CSRD depot operators. There is a lack of accountability on behalf of GFL to respond appropriately to servicing issues, which in turn creates challenges for CSRD Depot operators to deliver the Recycle BC services required under existing Servicing Agreements.

4.3.2 Accepted Materials

- Recycle BC only accepts items that are compatible with the collection and processing system and has a viable end market. Recycle BC collects producer fees from products that are not compatible with the system and cannot be recycled. Since those items are destined to be landfilled the fees collected from these items should be going directly back to the Regional Districts, Municipalities and private landfill operators until the items is able to be collected and processed in the Recycle BC system.

4.3.4 Multi-Family Collection

- A greater commitment in the plan is required to improve the collection at multi family units. In CSRD, member municipalities have no interest in adding on a multi family program to their collection program. In Revelstoke, Recycle BC operates the program, and it is unclear if all the multi family buildings are even captured in the program. Recycle BC needs to build capacity and work with municipalities and private haulers to service multi family units to increase diversion rates and improve the collection network.

4.3.5 Integrated Recycle BC Collection Services

- Under the proposed criteria the CSRD would lose 9 rural sites. With the reduction of service levels and the unwillingness of residents to travel up to 40km to reach another depot there would be a decrease in participation in the program. A select few residents may bring their material to a designated depot, but the vast majority will be throwing the material in the garbage, which the CSRD is trying to disincentivize with higher fees for items that have a dedicated program and can be diverted.
- In 2014, BC led the nation by being the first Province to make producers fully responsible for managing residential packaging and paper products. To support this initiative the CSRD chose, by Board resolution, to accept Recycle BC's offer to participate in their depot collection program, beginning on January 1, 2015. The CSRD assisted in the development of the Recycle BC program by signing on all sites and partnering with bottle depots in the member municipalities to create access for residents and bolster the program throughout the region. The initial support from the CSRD and other Regional Districts made the Recycle BC program expand and be successful.
- Under the recycling regulation Recycle BC is responsible for the collection and management of the regulated PPP. Under the proposed model the capture rate will be greatly reduced in rural areas and there will be political pressure from elected officials who have been provided this service in their region and do not want a reduction of service or want residents travelling up to 40 km to a depot.
- In the notification sent by Recycle BC on the proposed criteria it was unclear on how the population data was gathered. The CSRD has multiple communities that swell in population depending on the season with tourists and recreational homeowners. It was unclear if this was factored into the decision-making process by Recycle BC. In the plan Recycle BC needs to outline how population data was collected and consider seasonal population growth and volume of material collected.
- With the few depots that would remain there would be concerns around the ability to manage an increase volume of material and if the level of servicing could handle the increase.
- The CSRD invested significantly to meet recycle BC standards at the introduction of the program to develop infrastructure at each site. With the proposed criteria the purpose-built storage areas may sit idle unless CSRD operates these facilities as satellite depots.
- The statement *A local organization is willing and able to provide collection services that meet all program requirements and collection standards* requires further definition. The wording is not clear if that could include a private company providing curbside service.

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- The plan identified duplication of transportation as a concern. With the proposed criteria there are more cars on the road driving further distances to depots rather than vehicles driving shorter distances and trucks transporting larger volumes of materials.
- The plan references *Collection also occurs at participating retail locations*. London Drugs is the only retail location in the program and there are no locations in the CSRD. A stronger commitment in the plan is required to significantly improve the return to retail program. London Drugs signed on in 2017 and since that time no other retailers have joined.

4.3.3 Curbside Collection

- For the areas Recycle BC provides direct service programs a commitment in the plan to exceed best practices with the collection contractors that are hired, and innovation of the curbside collection needs to be expanded in the plan. For example, with OPFF and Soft plastics able to co-mingled Recycle BC can start to implement a monthly collection of material to increase diversion rates and provide a model for other collectors in the province.

4.3.7 Streetscape Collection

- The definition of Streetscape collection needs to be expanded to include other collection options other than municipalities. For example, the BC Parks and Parks Canada would be organizations to engage with to collect PPP throughout the province. Also, in outdoor spaces adjacent to malls where a high percentage of the garbage collected are Recycle BC items.

4.3.8 Financial Incentive Methodology

- With the consultants reviewing the remuneration of the program and accompanied reports, there never seems to be consideration for the true cost of being a depot collector. The CSRD operates Recycle BC collection depots at a loss and these depots require subsidization each year. More consideration needs to be given to the overall costs of managing EPR programs, which the incentive CSRD gets for managing the Recycle BC material does not cover the true costs of operating. In the plan there needs to be a commitment from Recycle BC to offer a true EPR program and provide cost recovery to manage the material. Additional fees/penalties could be levied on manufacturers who provide packaging into the stream that is not able to be recycled (i.e. squeeze tubes).
- In 2021, based on CSRD RBC Depot collection reports and the CSRD's annual financial report, the CSRD RBC Depot collection program required approximately **\$400,000 in subsidies**. This funding shortfall by RBC is clearly at odds with the Provincial directive that stewardship programs; "*makes producers responsible for funding their recycling programs*".

4.4 Post Collection

- As outlined in the plan there is the addition of *building program resilience*, but greater detail is required to determine the challenges of shipping the material from the interior to the lower mainland. A commitment of developing contingency plans to allow for the continued collection of materials and not having to ask residents to hold onto materials for weeks and months until a solution can be found.
- One of the key outcomes in the plan is *System efficiency with minimal redundancy*. As mentioned previously in the feedback there has been no conversations or meetings with GFL regarding their transportation, challenges that have occurred and how to improve efficiencies. A commitment in

Columbia Shuswap Regional District response to Packaging and Paper Product Extended Producer Responsibility Draft Plan

the plan for Recycle BC to improve and build the capacity of GFL to respond and track complaints and improve the system is required.

- The depot payment and depot pickup acknowledgement systems are not user friendly and require such a significant amount of staff time to review and compare that it is not worth the effort. Tracking pickup and payment is important as there are errors made. Also, in the pickup acknowledgement report there use to be weights of the roll off bins, then it was removed. The weights are beneficial to be able to manage site attendants and maximize efficiencies. A new system needs to be developed so the scanning of the bar codes can be easily cross referenced by the depot payment information.

5.3.2 Material Category Performance Targets

- In the plan there needs to be more commitment to transparency in the reporting of data collection and the inclusion of both out of scope materials as well as garbage in the annual report. In making this addition will provide more accurate data which will be reflected in the recovery rates.

4.6 Communications

- Recycle BC has a strong media presence with bus ads, partnerships with Canucks and Whitecaps etc. Recycle BC has no reach into rural areas and is highly reliant upon Regional Districts and Municipalities to provide information to the residents. In the plan there needs to be a focus on developing resources for rural areas for Regional Districts and Municipalities to use, understanding that social media and connectivity has very low participation in these areas.
- In the plan Recycle BC also needs to commit to using more media images from across the province to better represent the province, not just the lower mainland.
- The introduction of the events team by Recycle BC is positive and the program needs to expand to include all EPR programs and cover more of the province (see additional comments section).
- In the plan there needs to be a commitment to build Innovation around the Recycle BC app. Currently it has limited functionality and is sometimes confusing to use for residents.
- More information collected from Centre for Material Intelligence (CMI) needs to be shared with collectors so there is greater understanding of what non program materials are being collected.

Additional Comments

- Changing the reporting of stats at year end would be beneficial as Regional Districts need to provide year end reports to the ministry and data for the previous year is not available until late April or early May.
- More policies are required to improve working relationships between all the Stewardship Agencies of BC. Back in 2017 there were summer students who travelled the province promoting all programs in BC. This program has many benefits and needs to be reinstated. More partnerships for education need to be formed between all Stewardship Agencies. A repository of educational resources, social media posts, ads etc. needs to be developed and made available to all collectors, municipalities, and local governments with a common look, feel and messaging. Currently the stewardship agencies work in silos and more collaboration is necessary to advance EPR programs in BC.
- In all the renewal of stewardship agency plans a commitment to transition to stewardship operated depots needs to be considered. This would not necessarily end the dependence on the collector network, but in communities with a large enough population depot could be set up and collect all

Columbia Shuswap Regional District response to Packaging and Paper Product Extended Producer Responsibility Draft Plan

EPR items, training would exceed industry standards and BC would be a model for other jurisdictions.

- Hard and soft cover books need to be a part of the recycling regulation along with plastic storage containers (like Rubbermaid) and laundry baskets.

From: [Vivian Schau](#)
To: [Recycle BC Consultation](#)
Cc: [Sarah Willie](#); [Stephanie Valdal](#); [Jennifer Ivan](#); [Jesse Lee](#)
Subject: CSWM Consultation Feedback re: Recycle BC Draft new PPP EPR Plan
Date: Saturday, December 31, 2022 6:51:20 PM
Importance: High

CAUTION: This email originated from outside of the organization.

Hello,

Thank you for the opportunity to review and provide feedback on the Recycle BC's draft new Packaging and Paper Product Extended Producer Responsibility Plan (Plan). Please find below the response from the Comox Strathcona Waste Management service regarding the draft Plan.

1. There are significant volumes of Recycle BC materials that are consumed daily outside of the household, such as at schools and places of work. Expecting consumers to bring their packaging back home afterwards provides an unnecessary barrier to the capture of these materials, in particular plastic film which is not traditionally accepted in ICI recycling streams. Efforts to expand the capture of plastics from the waste stream by Recycle BC should include piloting and potential expansion into controlled collection areas such as schools and workplaces. This would also support education efforts for the program by aligning what can be recycled at home to what is acceptable in other settings.
2. The removal of the requirement for a curbside garbage collection program to precede the addition of curbside recycling is appreciated, and will further the argument for expansion of curbside collection in our rural areas. Through our recent (failed) electoral assent process, it is evident there is a need and a strong desire for a cost effective curbside recycling service. These rural residents pay into the Recycle BC and should have access to curbside recycling, not be penalized as a result of other political dealings.
3. The criteria for transitioning to service by Recycle BC is slanted in favour of Recycle BC. Recycle BC does not fund the investment in recycling collection containers for curbside programs, but is requiring that "the existing inventory of collection containers is provided to Recycle BC at no cost". This is a significant gift from the taxpayers and the asset value should be recognized in the transition of the program delivery. The timing of the transition is better to be aligned with the termination of the agreement between the local government and the contractor, if applicable, and not the local government and Recycle BC.
4. The areas where multi-family collection programs are 'actively recruited' should not be limited to a list generated by Recycle BC. If the private sector is willing to provide the service, then Recycle BC should be willing to include that material in their program. This is an area where Recycle BC could be using their expertise in behavior change to improve on contamination and participation rates from this significant portion of the population.
5. The Community Eligibility Criteria for Integrated Recycle BC Collection Services were not developed with any consultation from local governments, whom will be most impacted by their subtle implications. It is apparent that significant consideration was

given to development of the criteria however it was in isolation from stakeholders including the public. There is also no rationale provided for the reduction to depot services when they are entirely responsible for the acceptance of the poorest performing materials, plastic film and expanded polystyrene.

6. The BC wide 75% target is problematic because as long as the Province maintains a target of 75% that Recycle BC can easily meet by focusing on the most populated areas of the province, Recycle BC will continue to underserve less populated areas as the volumes just aren't needed from those areas to meet their target. The 75% target should be broken up into urban and rural/remote communities so that Recycle BC is held to the same standard in the smaller communities.
7. Local government invest significant capital to bring their depots up to Recycle BC requirements and standards, including equipment needed to load Recycle BC materials. Across the CSWM service where we have Recycle BC approved depots, we have invested in equipment to load Recycle BC materials in effort to make the loading process easier for the driver, by stacking the bags and loading pallets with equipment. For this effort, our SOW fee structure should reflect this, and not pocketed by the hauler (GFL).

The Plan should not be approved with these proposed criteria as they risk the reduction in the level of service to residents, and will have significant impacts on local governments who will be expected to 'fill the gaps' left if depots are not funded by Recycle BC. Since 2014, elected officials have been sold on investing in capital upgrades to depots and in staffing expenses to meet Recycle BC's requirements for inclusion in the program. At no time was it made apparent that these previously approved depots would become 'unapproved' at the whim of Recycle BC. If the draft Plan is approved, the notion of removing these newly 'unapproved' depots would cause a serious backlash in the community it used to serve, and one can surmise it would not go over well politically. This financial burden would be downloaded yet again on local governments at the expense of the very same taxpayers that fund Recycle BC. This is a precedent for EPR programs that puts at risk the financial viability of compliant private depots, as well as the trust of the public and elected officials. Local governments simply cannot operate on this level of uncertainty.

The criteria result in non-sense reduction of service, such as the potential elimination of our depot at the Comox Valley Waste Management Centre, which is the last line of defense for diversion of materials destined for landfill and is extremely well used. The infrastructure of existing depots and the population they are expected to serve should take into consideration the available parking and storage capacity. The number of depots is not the only factor for consideration. The criteria also do not consider the population of the non-incorporated areas around the cities when being evaluated.

Regional Districts should be able to determine through their Solid Waste Management Plans and their understanding of communities and consumer behaviors in their service areas where depots or collection events are needed to meet their targets in their plans. EPR programs should then be required to meet that criteria, which will best serve the public interest and can be defended by local governments by the robust consultation required for a SWMP approval.

Depots not at Risk:

- Campbell River Waste Management Centre - Meets the proposed 10K Criteria
- Island Return-It Campbell River (Private) - Meets the proposed 10K Criteria
- Courtenay Return-It Depot (Private) – Meets the proposed 10K Criteria

- Gold River – Meets the proposed Small Community Criteria
- Denman Island - Meets the proposed Island Criteria
- Hornby Island - Meets the proposed Island Criteria
- Cortes Island Strathcona B - Meets the proposed Island Criteria

Existing Depots at Risk

- Comox Valley Waste Management Centre - Doesn't meet the proposed >2k criteria. Under 15km from a 10K municipality and a principal depot
- Comox Return Centre (Private) - Doesn't meet the proposed 10K Criteria
- Sayward - Doesn't Meet the proposed small community criteria, catchment area (30 min drive) population is under 1,000 population
- Tahsis - Doesn't Meet the proposed small community criteria, catchment area (30 min drive) population is under 1,000 population
- Zeballos - Doesn't Meet the proposed small community criteria, catchment area (30 min drive) population is under 1,000 population

Communities that meet the criteria but don't have a Recycle BC Depot:

- Quadra Island – Onboarding in 2023

There is no commitment in the criteria that a local government can transition or establish a satellite depot with the current wording. The suggested change is:

Recycle BC will also permit local governments to establish and operate satellite depots in communities that do not meet the eligibility criteria outlined in Appendix C, subject to Recycle BC review and approval (which would not be reasonably withheld).

Again, thank you for the opportunity provide feedback on this important consultation. We look forward to seeing our comments reflected in the future iteration of the Plan.

Kind regards,

Vivian Schau

Senior Manager of CSWM Services

Engineering Services

Comox Valley Regional District

770 Harmston Avenue

Courtenay, BC V9N 0G8

Tel: 250-334-6025

The Comox Strathcona Waste Management service area is located in the Coast Salish, Kwakwaka'wakw, and Nuu-chah-nulth territories.

From: [Leah Berscheid](#)
To: [Recycle BC Consultation](#)
Subject: CVRD Feedback on Recycle BC's Proposed Plan
Date: Saturday, December 31, 2022 2:39:18 PM
Attachments: [image001.png](#)

CAUTION: This email originated from outside of the organization.

Hi there,

The CVRD would like to submit some comments on Recycle BC's Proposed Program Plan as follows:

1. Volumes not Distance

We request RecycleBC focus on tonnages of PPP collected instead of proximity to other depots. For example, the Fisher Road Recycling (FRR) satellite depot serves approximately 14,000 people and collects as much or more than some of our primary depots (Meade Creek and Peerless Road Recycling Centres).

2. Travel Time

We are not certain how the 40 min travel time was determined as a reasonable travel time to recycle materials. Only residents that have access to cars *and* those that are highly motivated to recycle would consider this as a reasonable option.

3. Closing satellite depots – political and operational concerns – traffic impacts at current depots: residents are already expressing that lineups are too long.

4. This goes against our SWMP goals: removing coinvent access will increase landfilling which can have significant impacts as we do not have a landfill

5. Increased GHG emissions as the increased distance causes residents to drive further to responsibly manage their materials

6. Consider CBSM as part of developing future program plans if not done already – there are many barriers for residents to *successfully* participate, with distance and convenience being some of the top considerations. A CBSM lens could help Recycle BC meet its recovery targets and provide useful information to its collectors to spread a uniform message to all British Columbians.

Thank you for your consideration and have a happy new year!

Leah

Leah Berscheid (She/Her)
Environmental Technologist
Recycling & Waste Management Division
Operations Department
Cowichan Valley Regional District
175 Ingram Street, DUNCAN BC V9L 1N8
Email: [REDACTED]
Office: 250.746.2548/ [REDACTED]



To access CVRD curbside collection schedules and the Cowichan Recyclopeda, download the **Cowichan Recycles** mobile app or visit cvrd.bc.ca/Recycling.

I acknowledge that for thousands of years the Quw'utsun, Malahat, Ts'uubaa-asatx, Halalt, Penelakut, Stz'uminus, Lyackson, Pauquachin, Ditidaht & Pacheedaht Peoples have walked gently on the unceded territories where I now work.

Please note the CVRD offices located at 175 Ingram Street will be closed over the Christmas Season from 2 p.m., December 23, 2022 up to and including Monday, January 2, 2023. Regular office hours of 8 a.m. – 4:30 p.m. will resume on Tuesday, January 3, 2023.

January 5, 2023

Recycle BC
405-221 West Esplanade
North Vancouver, BC

RE: Packaging and Paper Product Extended Producer Responsibility Plan – Consultation Draft
September 29, 2022

Dear Recycle BC,

Thank you for the opportunity to comment on the Recycle BC draft Program Plan. The District of Squamish is committed to a Zero Waste future that embodies the Circular Economy principles and acknowledges that climate change is happening, and local governments play an important role in reducing greenhouse gas emission. The need to respond to climate change is urgent and achieving zero waste through diversion, waste reduction and redesign is a key component.

Zero Waste is the conservation of all resources by means of responsible production, consumption, reduction, reuse, and recovery of products, packaging, and materials without burning and with no discharges to land, water, or air that threaten the environment or human health. Our current resource consumption systems not only create waste but also generate a huge amount of greenhouse gases which constitute some of the discharges that threaten the environment and human health. EPR programs can play a key role in changing these consumption systems, especially the program that oversees the packaging and printed paper products, Recycle BC.

We recognize that BC is a global leader in EPR programs, and that the Province, through the *Recycling Regulation*, has supported their growth and development. Since their inception, the EPR programs have evolved, they are utilized extensively within our community and they are integrated into waste diversion programs/systems throughout the province.

That being said, it is up to the Province to ensure that these Programs, Recycle BC included, are continually moving the dial to ensure they move beyond business as usual and to drive change higher up the pollution prevention hierarchy. The expectation is that these Programs exceed status quo in the following actions and related targets:

- Increase collection rates,
- Increase accessibility,
- Increase customer and industry awareness of all accepted products,
- Increase their support of developing North American markets for post-consumer manufacturing, and
- Increase their support of the top tiers of the pollution prevention hierarchy, such as reduction and reuse.

The District of Squamish is pleased that Recycle BC will be submitting its plan which includes some improvements to its existing system, however, finds that there are many ways the Program can be improved beyond what is in the draft plan. The District submits these comments in hope that the Program will show leadership in the realm of EPR to move it beyond mere recycling to actually changing the nature of the products and how the service is delivered. The District encourages Recycle BC to set the bar high.

Section 1. Context

While we appreciate the context provided by Recycle BC program for providing collection and recycling services for residential packaging and paper products. Recycle BC should go further beyond its producer members' plastic recycling objectives, or those of the Canada Plastics Pact (CPP), to actively working to decrease the total volume of plastic, starting with the hard to recycle, single use and low market value plastics.

Section 2. EPR Agency

2.2 Administration

The Board of Directors should represent a wider range of stakeholders including reuse and refill organizations, recyclers, other local governments, First Nations and environmental NGOs.

While we are pleased to see an Advisory Committee set-up, we would like to see municipal representation on either the Board of Directors or the Advisory Committee, not just Regional Districts, as often it is up to the member municipalities of a regional district to manage the material, and communicate with the customers, of Recycle BC. Additionally, there can be more transparency for this committee by including minutes, recommendations from the committee and how the Board has addressed them on the website.

2.3 Producer Members and Definitions

There is a definition of "small producer" in the *Recycling Regulation* that exempts producers with gross revenue of under \$1,000,000 but the packaging from these producers still flows into the waste and recycling system and the exemption allows small producers to use packaging without penalty and at a cost to the other producers. Recycle BC should work with the Ministry to lower the exemption amount step-wise over time to capture more producers, collect better data and even the playing field.

2.4 Program Financing

As the intention of the *Recycling Regulation* is to focus higher up the pollution prevention hierarchy, the program should also be funding education and incentives for the producers to offer refill and reuse systems and to decrease their packaging. Fees should reflect management costs but also be calculated to reflect environmental costs to drive a decrease in plastic packaging and the use of more local, circular systems. As the volume of flexible PPP seems to be increasing over time, we would like to see Recycle BC leverage this methodology to help further influence producer packaging choices away from harder to recycle packaging such as flexible plastics.

Recycle BC should further develop variable environmental handling fees based on certain criteria such as lifespan, use of refillables and reusable containers, use of easy to recycle materials (versus materials that are wasted by being burned for energy), etc. to drive product design change as intended by the Canadian Council of Ministers of Environment. The program could incentivize reusable containers and then those that are actually recyclable.

While the District agrees with the principle that all obligated materials should bear a fair share of the costs to manage the package and paper product program, irrespective of whether a material is collected. However, we disagree with using producer fees from non-recyclable PPP and single-use items to offset costs for recyclable PPP. This is not the intent of EPR. The producer fee setting methodology would be more effective if Recycle BC committed all fees from each type of non-recyclable PPP and single-use item to dedicated reserves and invested them in research and development, end market development, promotion, education, and other initiatives to move non-recyclable PPP up the pollution prevention hierarchy. Additionally, there is a high volume of beverage containers that are unintentionally put into the Recycle BC stream by residents. Recycle BC should be clear on what these deposits are used for, that they receive from ENCORP.

It isn't clear on the Recycle BC fee schedule (online) however, it appears as though producers are being paid by Recycle BC for producing easier-to-recycle materials. The District of Squamish supports producers for being rewarded for more recyclable materials, however, that should be in the form of lower fees, not money-back or credit, as the EHF is money that has been paid by the customers, and should go into the collection system or educational efforts.

The fees should also be set at a higher level to pay for the improvements needed in understanding collection rates, providing more comprehensive collection networks, enhancing awareness and fulfilling the mandate for redesign and reuse.

Sufficient fees should be collected to pay the actual costs borne by collection partners and to build a reserve fund to prepare for the expected increase in severe weather and other events. The program **needs to prove** that all collection sites are being adequately compensated for their services and in particular, that local and First Nation governments do not end up subsidizing the program (including for education services).

Section 3. Packaging and Paper Product

In reviewing audit reports supplied by Recycle BC, "not accepted PPP" is included in the total not-accepted material contamination category, however this material is packaging and should be moved from the not accepted material category to the incompatible material category so that it doesn't count towards a service level failure credit score.

3.2 Paper Product

The District would like the program to include books (soft and hard cover) in the program, as they are a paper product that the District is currently struggling with managing and residents have limited drop-off sites.

3.3 Single-Use Products and Packaging-Like Products

With the additional Single-Use Products, Recycle BC must also include related collection targets and an explanation as to how these products will be managed, post-collection. Additionally, as these products are inherently more difficult to recycle, their product EHF's should be reflective of that – helping to drive the intended design change.

3.4 Sources of Packaging and Paper Product

We understand that residential premises are defined in the *Recycling Regulation* and therefore Recycle BC does not have the authority to change this definition. The District feels that accommodations where people reside should all be included as residential, whether there is care or services provided or not. The exemptions that Recycle BC has pre-defined for single- and multi- family dwellings should be reevaluated to include many of the exemptions listed in the footnotes. Dwellings such as time-share, fractional ownership, residences with medical care, senior and student housing, are all places of living. It may be the owners who use their units exclusively, or a student who lives there 10 out of 12 months, there is no difference in the types of packaging used in these units and it is no different to the numerous single-family homes do receive service. If a building is considered a residential building, then it should fall under the multi-family definition.

4. Program Design

4.2 Program Delivery Overview

In smaller communities where the division of recycling services into residential (Recycle BC) and ICI (local government or private sector) has created a problem in marketing the remaining materials, we would like to see Recycle BC offer a service (for a fee) to transport, process and market the materials that end up at local government (or local government-approved) facilities. This would alleviate the challenges that local governments have experienced handling the smaller volume of materials and reduce redundancy of systems and services.

The fees should also be set at a higher level to pay for the improvements needed in understanding collection rates, providing more comprehensive collection networks, enhancing awareness and fulfilling the mandate for redesign and reuse.

While there are areas where Recycle BC directly manages the recycling services and related communications, those local governments should still have the ability to provide feedback and input into the program, as ultimately it is the local government that residents come to for questions, concerns and help.

4.3 Collection from Residents and Streetscapes

As PPP is ubiquitous, its collection needs to be a service that is offered in conjunction with option to dispose of garbage and it is Recycle BC's responsibility to provide this at home, in apartments, for communities including First Nation communities, and at streetscape. This service needs to be permanently or frequently available. It is unreasonable to require residents to store packaging at home waiting for an intermittent and infrequent option (such as mobile depots) to occur and this is likely to increase materials going into the garbage or appear as litter.

Local governments need to be allowed to switch to direct service with Recycle BC easily (particularly given the costs are not fully compensated). While at the same time, local governments should be able to maintain the ability to provide some direction on operational aspects to increase diversion, ensure harmonized schedules and maintain the connection to residents. Service needs to be provided by Recycle BC to match garbage services, even if the community does not have a grocery store or if there is not a local organization that will provide the service. This program handles the most frequently discarded type of products/packaging so the accessibility of services should be the highest of any EPR program.

4.3.2 Accepted Materials

As previously mentioned, the District supports charging fees for materials that are put into the marketplace but not collected. However, these fees should then go to local governments who end up with the responsibility of handling them (either through their litter-collection programs or at a disposal facility). Fees for unaccepted materials should be high enough to drive design change. By doing this, the producers are incentivized to change design, local governments are compensated for their services and the program does not benefit from not collecting the materials (thus avoiding a perverse incentive).

Waste composition studies should be utilized to identify which materials are not being captured by the recycling system in an area. The District of Squamish conducts a bi-annual waste composition audit at the Squamish Landfill, and has added single-use items to the data it looks at, yet Recycle BC has never approached the municipality to participate in the waste compositions. Recycle BC should commit to participating in a certain number of waste composition audits per year, with some being annual, and others representing different regions within the Province. They should take a comprehensive and methodical approach to identifying when and where waste composition audits are being conducted, and participate in them, so that the host-organization can afford to go to the level of detail in the audit that provides information on Recycle BC materials. It is currently up to the local government to reach out to the individual stewardship organizations or SABC, to see if there is interest to participate in a waste composition. As waste composition data provides a rich source of insight into whether a program product is/ or isn't ending up in a landfill or transfer station in an area, there should be more effort on behalf of the EPR programs to be involved in waste composition studies. And to provide financial assistance to those areas where they aren't conducted, so that data is accounted for. SABC is currently committed to two waste audits per year, which is too low.

The other activities that Recycle BC will pursue (estimating percentage of not accepted materials, etc.) are good steps and the results should be made public. However, following the principle to focus on outcomes and minimize complexity, the most suitable activities are to work to phase out the non-recyclables through producer engagement, education, eco-modulated fees and collaborations to ban problematic packaging.

The District of Squamish would like to see Recycle BC use its accumulated knowledge, stakeholders and plastic end-markets network, to work with the MOECCS to develop a durable plastic program. Durable plastic materials drive contamination rates as it is an easily confused item.

Compostable PPP

We fully support compensation of local governments for their processing of the fibre-based elements but want to ensure that Recycle BC does not support the collection of any compostable plastics, nor fibre that has been treated in any way (such as coated with PFAS or any other potential contaminants). In addition, Recycle BC should ensure that the materials sent to a composting facility are able to break down under the actual operating conditions of the facility and that the facility wishes to accept them. If not, Recycle BC should consider developing its own collection and processing system.

4.3.3 Curbside Collection

The District supports Recycle BC's expansion of its curbside collection and also its work with First Nation communities to improve collection infrastructure. However, there is a push for single-stream automated systems to move towards multi-stream collection, which doesn't seem to be compatible with communities that see higher levels of snow and bear activity than some of the municipalities within Metro Vancouver.

Additionally, the criteria set out in Appendix B for which communities qualify for service, does not meet the intention of the *Recycling Regulation* (which does not have these limits). Recycle BC services very small to very large communities so it has proven that the system can work in small communities. In addition, residents in small communities still pay the environmental handling fees when they buy products, and therefore deserve equal access to the service. The services should be offered to any municipality, First Nation community or rural community that has or is planning to implement curbside collection, regardless of size, density, if there is a grocery store or if the previous contract holder declined to renew. Once a community has signed up for the service, it should be delivered within a calendar year or to coincide with the rollout of curbside garbage service, if that is being added. Recycle BC should pay for the bins.

4.3.4 Multi-Family Collection

The system and oversight of the collection from multi-family buildings needs significant strengthening. Transparency is needed to show the percentage of multifamily buildings in BC that receive services with a target to get to 100% of buildings that wish the service being serviced within 5 years. The District of Squamish has tried to support multi-family buildings in joining the Recycle BC program, to be met with limited and confusing information from Recycle BC.

Communications should be direct to the building owner or strata, as it is not clear if most are even aware of the obligation Recycle BC has to provide their services and that the Regulation would dictate that Recycle BC pay the cost of recycling. A building owner or strata should be able to opt in and then Recycle BC should be responsible for providing the service (regardless of if curbside service is offered in the community or not, or by their hauler). All areas of BC should be serviced by Recycle BC with a particular focus to quickly expand service in smaller communities where existing options for multi-family recycling do not exist.

See above comments in Section 3.4 Sources of Packaging and Paper Product, for additional comments on multi-family household participation and the exemptions that Recycle BC has created.

4.3.5 Integrated Recycle BC Collection Services

The proposed New Criteria for Integrated Recycle BC Collection Services puts a significant number of Recycle BC depots operated by local governments across the province at risk of losing Recycle BC support and funding once existing agreements expire. Recycle BC needs to increase service, not decrease it. It is inappropriate to suggest communities that currently have service could lose it should the current provider decide to no longer provide the service, and that there are communities who don't qualify for a depot.

The new criteria impacts the ability for the Squamish-Lillooet Regional District to open up a Recycle BC depot in neighbouring communities to the District of Squamish (ex. Furry Creek and Britannia Beach). The current Recycle BC depots in Squamish are already at capacity (long wait times, limited house of operation, bins are often full, etc.), and despite requests from the District of Squamish, Recycle BC has not set any standardized hours of operation or required the depot to increase their accessibility. So as the neighbouring communities within the SLRD grow (they have major developments in the works) – this is only going to increase the pressure on the Squamish Depots, which are already strained.

The District of Squamish requests that the Program Plan is reviewed thoroughly through the lens of equity and accessibility. Currently accessibility seems to be addressed as to whether a community is eligible for service or not. However, what seems to be missing is accessibility to actual depot sites within a community. Several of the materials collected by Recycle BC require residents to travel to the depot site, yet there is no discussion around how accessible these sites are (ex. proximity to a bus stop, do the hours of operation include hours beyond traditional workday hours, etc.). Nor is equity discussed in the program plan. This program is well established and should work to increase both the accessibility and equity for depot-only items, and overall service in the ICS system.

We fully support the ability for local governments to operate satellite depots and would request that Recycle BC cover their fair share of the associated costs (currently not the situation), and include the greenhouse gas calculations in the Recycle BC total. Please note that while mobile depots are an excellent way for outreach and education, they should not be considered as an alternative to permanent depots. It is unreasonable to expect residents to hold onto their PPP until a once a month/quarter/year mobile event occurs.

To support a circular economy and zero waste, we also suggest Recycle BC update this section to take into account proximity to other recycling and garbage disposal locations when deciding to approve or maintain depot locations.

It also should be noted that in Appendix C, Recycle BC is requiring “A local organization [who] is willing and able to provide collection services that meet all program requirements and collection standards” for services to be offered. This puts the responsibility on the local government to step in if there is no ‘local organization’ who wants to be involved in Recycle BC’s program. This requirement should be removed from the eligibility criteria, and if there is no local organization, Recycle BC should step-up and provide the service directly. Not all local governments have the space/land, capacity, finances to offer this service.

Comments on Appendix C:

Small communities:

- The minimum population of 1,000 permanent residents within 30 minutes will exclude many rural communities who do not have access to services and it does not account for seasonal fluctuations into areas as a result of tourism.
- The “more than 40 km from an incorporated municipality” would significantly decrease service accessibility.
- Utilizing population statistics to determine service level provision may not be a representative way of determining depot viability as they do not account for the high volumes of visitors and non-permanent residents the area sees annually.
- The permanent grocery store requirement would be a barrier to many rural communities.

4.3.6 First Nations Collection

We appreciate the work that Recycle BC has done to enhance the recycling options available in First Nation communities, for Recycle BC materials and also for other EPR program products through the First Nations Recycling Initiative. Recycle BC is also to be commended for its collaboration with the Indigenous Zero Waste Technical Advisory Group. We feel that Recycle BC can build on this work through, not just providing financial offers to those communities that have the recycling capacity, helping communities build that capacity, fully funding Recycle BC’s portion of the costs and working to eliminate wait times to access service. In First Nation communities where there is a service for garbage drop off or collection and the community wishes recycling services for PPP, Recycle BC should provide them at its cost and in a timely manner. Bulk drop offs are not an adequate solution as not all communities have the space or resources to collection, storage and transport of the PPP to a depot. Where collection services are provided jointly to both a municipality and a First Nation, additional resources should be provided to ensure a high standard of service can be maintained given the different systems that may be required.

If there is a First Nations community located near a depot serviced by other local governments and private companies, Recycle BC should consider allowing these depots to accept the material in the manner that makes the most operational sense to the depot handling the material and the First Nation community

It is also important that collection of materials from the depots is in a timely and frequent fashion to ensure that storage of the materials does not burden the community and impact its ability to collect these or other EPR materials.

Recycle BC’s support for community clean-ups is an excellent initiative, and should be offered to all communities as well, given that packaging is usually a key component of the litter. This should be included in the targets.

4.3.7 Streetscape Collection

The District of Squamish disagrees with statements in the draft plan that suggest streetscape recycling programs have extremely high contamination, unacceptably high greenhouse gas emissions, poor

environmental outcomes, and are not aligned with the Clean BC strategy. There is proof that streetscape collection can be done, however it needs to be well managed, communicated and executed.

The District cannot comment on the feasibility of the proposed streetscape plan until Recycle BC publishes, and consults on, the contamination and recycling rate standards and the financial incentive mentioned in the plan. However, at this time, Recycle BC should add more actions to balance the risks equitably between producers and local governments, and commit to collaborating with municipalities and provide assurance of a permanent program. The District, nor the MOECCS, should accept the argument that streetscape recycling is too difficult. Developing solutions to challenges and a commitment to continuous improvement is standard with every public facing program, and must be accepted by producers as a mandatory component of any current or new program being developed under the *Recycling Regulation*.

4.3.8 Financial Incentive Methodology

The District of Squamish understand that contamination has a strong impact on Recycle BC's ability to market collected materials, however based on the results of the most recent cost study, Recycle BC is not covering the average cost for collection. The plan states that inflation is part of the analysis, but with the lagging nature of the study using 2019 cost data to set rates for 2022 – 2025, and the impact of inflation on collector costs, the program incentives need to cover at least the average collection costs, with consideration for increasing incentives to account for inflation. Currently communities continue to subsidize the program or may not have suitable services.

Landfill Audits and Uncollected Materials

The use of waste composition audits is useful to see what PPP remains uncollected by the program, and the program should partner with other programs to conduct composition studies annually across BC. The results should be published on the Recycle BC website, and the details of the studies should be included in the annual report to the BC Government and made public. This data should be used to understand the degree of success of collection given the data missing on materials from small producers. Any local government or First Nation's government who requests assistance in funding a waste audit that includes residential PPP should receive appropriate funds and not need to go through the SABC request system. The goal should be to increase the data available to show program performance.

In addition, the program should pay local governments for materials that end up in local government facilities to both compensate them for the services rendered (and often the filling up of remaining landfill space with inappropriate materials) and to further incentivize design change by producers.

Finally, data should be gathered on mismanaged and littered material. Data from groups like the Ocean Wise Shoreline Clean Up and other clean up efforts (like Pitch In Day) can help to identify how much packaging is ending up in the environment. Producers should pay their fair share of the costs to clean this up, similar to what is being proposed in Germany.

4.4 Post Collection

Environmental outcomes should be included in the key outcomes for post-collection, which is the intention of the *Recycle Regulation*. Managing the material at the highest level of the waste hierarchy as possible, reduction (both volumes and toxicity of materials), reuse, avoiding downcycling, and minimizing disposal to landfill.

The Zero Waste Hierarchy should be used to develop systems for the PPP to be redesigned, reduced, reused and recycled. The District appreciates Recycle BC's diligence in overseeing end market destinations and processors, with a preference for OECD countries and processors that meet environmental, health and safety standards. This is essential to operating a quality program and building trust in the BC system.

4.5 Dispute Resolution

The District wants to ensure that the dispute resolution process remains balanced in power, between Recycle BC and the other party, which could be a smaller local government or First Nation. Current interactions with Recycle BC have been of the 'take-it or leave-it' nature (contracts, amendments, rates, etc.). It is extremely difficult now for a local government to leave the program, as the ability to market the material is now harder. Therefore, it is imperative that there is a fair dispute resolution process for all.

4.6 Communications

It is appreciated that Recycle BC has taken a strong approach to communications and provided a significant amount of resources to collectors. However, it is recommended that Recycle BC collaborate with municipal communications departments to leverage efforts of achieving the same objectives.

There are several tactics that Recycle BC can invest in, that would benefit collectors across the entire province, and it shouldn't be up to each local government to re-invent the wheel individually. This includes:

- **Focusing on increasing trust in the system.** Recycle BC has identified that there is a high level of mis-trust of residents towards the residential recycling system. Therefore, the communications program should not only work to increase awareness and make correct decisions on collection and recycling through its existing strategies, but also aim to change behaviour and **increase transparency** to the entire process.
- Increase the amount of material available in different languages. It has cost the District of Squamish almost \$1,000 to translate one curbside collection document into Punjabi. There are many single-stream collectors that could benefit from this work. Therefore, Recycle BC should provide information in multiple languages based on the make-up of the communities in BC. Programs may also need to connect with different audiences if there are different kinds of products used by different markets. Consider the demographics of BC with regard to languages and ensure the materials are produced in the suite of languages needed to reach multiple demographics for single-stream collectors *as well as* multi-stream collection.
- Develop material for all ages. The young/youth population is a great place to focus on, and Recycle BC could build or support materials that would reach this targeted population.

- Conduct user surveys to understand where and why materials may be uncollected, including looking at awareness, accessibility, convenience and other barriers that may exist to collection.
- Ensure that communication (financial) efforts are spread across all geographical area, investing in the WhiteCaps promotion is excellent, however, that doesn't support those communities that are outside of the Metro Vancouver region.

Many local governments are seeing an ever-increasing responsibility for communication and engagement from Recycle BC. Local governments are being tasked with lowering contamination rates in their communities through extensive communications plans. The required actions are costly in resources, third party contracts and staff time.

Metrics on customer satisfaction and collector satisfaction should be added to the program, with targets suitably high for such an established program. A secret shopper program should be implemented to understand the consumer experience and if the collection sites are welcoming of products and providing correct information.

The goal should be to get 95% of the population aware of the program by 2024 (and later 100%) with work done to increase awareness of the new range of products. To do otherwise is to continue to externalize costs to the public and the environment. More research should be done on the portion of product that is not collected to understand who is not participating in the program and what marketing and behaviour change initiatives are needed.

Section 5. Program Performance

It is appreciated that the program seeks to innovate and encourage reduction, reuse as well as recycling however, the plan should be explicit on what new steps the program will take to achieve this.

We recognize that BC is a small piece of the market for many of its producers and actions taken by Recycle BC may not be significant enough to influence packaging design or material choice. The District anticipates that as other provinces implement EPR for packaging real shifts will occur. The District supports ongoing review of producer fee structure in sending the right signals to producers that will result in an increase in the recyclability of their packaging choices. We encourage Recycle BC to continue taking an active role in exploring how to support packaging reuse and how reverse supply chain networks can be incorporated into the program.

The District of Squamish believes that ultimately we all need to work towards reduction, and thereby requests that Recycle BC focus higher on the pollution prevention hierarchy and ensure that efforts and money are spent towards this. In particular, Recycle BC should include a set of commitments and actions for how the program is going to drive rethinking PPP, eliminating harmful and hard to recycle forms, reducing environmental impacts, reducing toxicity of PPP (including inks and additives), and fostering reusables and refillables.

5.3 Performance Targets

The program is expected to meet a 75% recovery (or more accurately collection) rate or a higher target set by the Director. Given that this recycling system and program is well established and covers most of the province, **far higher targets are suitable than what is presented in the Program Plan.** In particular

the flexible plastic rate target is significantly too low. The change to aligned recovery rates is suitable as is the change to exclude non-PPP that is collected. We also support the material category performance methodology that re-calculates targets if a material reaches its performance targets for two consecutive years.

Further recommendations include:

- Including an estimate of the PPP introduced by small producers and adding that to the denominator for a more accurate representation of the PPP introduced to BC.
- Changing the recovery (collection) targets to 95% (including the addition of the small producers material and exclusion of the non-PPP) for 2023 reaching 100% by 2027. Every bit of PPP not collected continues to burden the environment as well as local and First Nations governments. Recycle BC has shown that these higher targets are achievable. It is unclear in the plan why lower targets than what has already been achieved would be appropriate for a program aiming for continuous improvement, nor why they are labelled as ambitious.
- Flexible plastic and foam should have targets to decrease their use in packaging.
- Providing an actual recovery rate (PPP recycled [not including the portion that is not sold to market for recycling or goes to landfill or other disposal]/ total PPP introduced to BC [including from small producers]) and set a clear, ambitious target of no lower than 75%.
- When targets are achieved or not or metrics go over 100%, there should be some explanation of what is changing in the system to influence these numbers in the annual reports.

Additional Comments on the targets include:

- The District requests that the collection/recovery rate metrics listed including reporting community (including contamination rates), not just Regional District, and provide this data direct to each community.
- The Consumer Awareness Target should be 95% increasing to 100% by 2027. Metrics should include surveys to understand why residents do not use available systems.
- The measurement of GHGs should be for systemic emissions and not solely for direct program operations.
- Financial transparency should be a goal and Recycle BC should provide detailed financial information annually.

The Accessibility metrics are also useful but should include a target to cover 100% of communities (including First Nation communities) with curbside or staffed drop off of garbage by 2027. Other metrics should show:

- The percentage of total population with service as well as percentage of communities (but not including communities served only with irregular, infrequent mobile collection events)
- Percentage of multifamily households serviced by community

Pollution Prevention Hierarchy Targets should include 95% of collected PPP to reuse or recycling commodity markets. There should also be targets and metrics set for:

- The number of producers directly contacted and the changes producers made to their packaging (to increase each year).
- A list of incentives and programs that Recycle BC has undertaken to drive redesign, reduction and reuse/refill.
- Tonnes of PPP for reuse and refillables (with ambitious increases every year).
- Decreasing use of virgin fibre in printed products.
- Decreasing toxic dyes and additives in PPP (including PFAS and similar).
- Decreasing the amount of material disposed aiming for zero by 2027.
- Number of community clean ups funded and amount and type of materials collected.
- Number of waste composition studies Recycle BC participated in.
- Decrease in amount of PPP found in waste composition audits.

The District of Squamish appreciates the opportunity to provide feedback and would like to reiterate that this is an opportunity to move the dial on supporting zero waste and the circular economy and we look forward to continued improvement of this program.

Sincerely,

Shannon White, MSc

Integrated Solid Waste Specialist

District of Squamish | *Hardwired for Adventure*

*I humbly acknowledge that I work on the traditional territory of the Squamish Nation,
Sḵwx̱wú7mesh Úxwumixw.*



20 December 2022

File: 09.1775.01

Recycle BC
405-221 West Esplanade
North Vancouver, BC V7M 3J3

Submitted by email: consultation@recyclebc.ca.

Dear Recycle BC:

RE: Recycle BC Program Plan Engagement – Fall 2022

The District recognizes that Recycle BC has put a great deal of work into preparing the proposed Packaging and Paper Product Extended Producer Responsibility Plan and into the public engagement process. We appreciate the opportunity to review and provide feedback on the Program Plan Consultation Draft, dated September 29, 2022.

Having transitioned to a Recycle BC Direct Service community in 2020, the District is no longer a collector of curbside or multi-family residential packaging and paper products (PPP). Of course, the District still has a vested interest in household collection and depot service on behalf of West Vancouver residents and recognizes Recycle BC's on-going efforts to provide residents with high quality collection services for PPP. The District also looks forward to the evolution of Recycle BC's program plan related to forthcoming provincial amendments to the Organic Matter Recycling Regulation of BC (OMRR).

The comments enclosed in this letter focus on Recycle BC's proposed approach for streetscape collection of PPP described in the Program Plan.

Alignment with Clean BC Strategy

The Recycle BC proposed Program Plan states that "streetscape collection as it is generally delivered today is not aligned to the Clean BC strategy" and that "it currently represents an unacceptably high greenhouse gas emission-intensive process". The GHG emissions profile of a streetscape program may be different than that of residential or depot collection, but it is not clear that this relevant considering the purpose of the Recycling Regulation.

The Clean BC Plastics Action Plan expressly indicates the province's on-going commitment to Extended Producer Responsibility (EPR), improving recycling and waste diversion, moving up the waste reduction hierarchy by reducing the unnecessary use of single-use plastics, and moving toward a circular economy.

Proof of Concept

Recycle BC's Program Plan continues to suggest that proof of concept has not been achieved for streetscape recycling of PPP. Having operated a streetscape recycling collection program for paper and containers since 2017, the District respectfully disagrees.

The District currently collects streetscape recycling from approximately 40 multi-stream collection stations in commercial areas. Since it launched, the program has diverted more than 70 tonnes of recyclable paper and containers, which accounts for more than a third of all material collected from locations where streetscape recycling stations are provided.

In its Program Plan, Recycle BC states that PPP material collected from the streetscape is “poorly sorted, heavily contaminated, wet with residual liquids, and unclean with food waste” and that “hazardous material can also be present”. In reality, these are challenges with any recycling program and are often true of material collected and processed from multi-family and single-stream residential programs.

Streetscape recycling has been included in the Recycling Regulation, and producers must accept that overcoming challenges is an unavoidable reality for any EPR program. Recycle BC has demonstrated a commitment to continuous improvement and innovation in other aspects of its program. We cannot accept the argument that streetscape recycling is simply too difficult.

While there is always room to improve, the District is confident that its streetscape program has achieved proof of concept. We are also confident that – given a fair, flexible, producer-funded financial incentive – this program could reasonably be replicated in other jurisdictions where processing facilities for PPP are available.

Principles for Streetscape Differ from Overall Program Principles

Recycle BC’s proposed approach for streetscape refers to three principles: “trust, cost, and fairness”. Notably, these principles appear in the Program Plan only with respect to streetscape and are not the same as the Program Delivery Principles provided in section 4.1.

Again, the District requests that Recycle BC provide further explanation as to why principles proposed for streetscape would differ from those that guide other aspects of this plan. The District would also request clarity regarding Recycle BC’s comment that other stewards materials be excluded from acceptable materials for streetscape collection (page 17), as this seems inconsistent with its approach for curbside and multi-family collection.

To prevent confusion for residents, producers and collectors, definitions and guiding principles should be clear and consistently applied throughout the Program Plan.

Recycle BC Financial Offer and Timeline

It is difficult to provide additional comments on the feasibility of Recycle BC’s approach for streetscape when Recycle BC has not published this information in detail.

For a number of years now, Recycle BC’s proposed servicing agreement and financial incentives have been forthcoming but deferred. Again, this Program Plan skirts the issue. Meanwhile, PPP continues to make up a significant portion of material collected from streetscapes and its collection costs are paid by residential ratepayers.

Recycle BC’s approach for streetscape should be aligned with the spirit of EPR and Recycling Regulation subsection 5(1)(d)(ii), whereby producers acknowledge and pay the *full cost* of collecting and processing program materials. The District eagerly awaits clarity regarding how producers will contribute to the cost of streetscape collection of PPP, how producers will share the risks associated with streetscape PPP recycling, and how Recycle BC will work

collaboratively with municipal collectors to deliver streetscape programs that are supported by reasonable financial offer and with reasonable program parameters.

In Appendix F, Recycle BC has proposed a timeline that indicates it will release additional information in Q3 2023. In the spirit of collaboration and transparency, the District would encourage Recycle BC to circulate a draft service agreement and initiate consultation with municipal collectors early in 2023 without further delay, so municipal collectors can consider potential impacts in advance of 2024 utility rate setting work that often takes place in the fall.

Conclusion

Thank you for your consideration of the District's comments. If you have further questions regarding the District's streetscape recycling program, please contact me at

[REDACTED]

Sincerely,

A handwritten signature in cursive script, appearing to read "E. Willobee".

Emily Willobee
Senior Manager, Engineering Services
District of West Vancouver

December 22, 2022

File: CR-24-04-EPR-12

██████████, Executive Director
Recycle BC
405-221 West Esplanade
North Vancouver, BC. V7M 3J3
VIA EMAIL: consultation@recyclebc.ca

Dear ██████████

Packaging and Paper Product Extended Producer Responsibility Plan

Thank you for the opportunity to submit comments on the Packaging and Paper Product Extended Producer Responsibility Plan, Consultation Draft September 29, 2022. Recycle BC has made notable progress in establishing a province-wide standard for packaging and paper products collected, expanding the types of packaging collected for recycling and engaging residents in the importance of recycling in helping to achieve a circular economy. These efforts have created stability in residential recycling and developed a foundation from which to further improve performance.

In order to continue to advance the management of packaging and paper in the region, a number of additional updates to the program should be considered. Of key importance is ensuring that the Recycle BC program outcomes fully match the intent of the BC Recycling Regulation.

- **Waste Management Hierarchy and the Circular Economy:** More action is required to continue to advance the reduction of packaging waste and the redesign of packaging to increase recyclability.
- **Depots:** Any depot collector able to meet Recycle BC standards should be included in the program, especially since depots are compensated according to the amount of material collected. Further, the Plan should include a clear definition for residential packaging and paper products that ties to the material being generated at a residence.
- **Streetscape:** The Recycle BC streetscape program should be launched in the near term using current definitions of in-scope and out-of-scope materials. Using different criteria and definitions for streetscape, as compared to the existing ones for curbside, multi-family and depots, will be confusing to residents, businesses and collectors.
- **Contamination:** A clear definition of contamination is required and should be developed with input from stakeholders. Contamination should not be used as a catchall term to describe a broad range of scenarios (e.g. in-scope packaging belonging to other producer responsibility organizations).

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- **Recovery Rate:** Although Recycle BC's proposed new approach to calculate a recovery rate, which more closely aligns with the language in the Recycling Regulation, is an improvement, much of Recycle BC's data and analyses are not available to stakeholders. Specific areas where improved access to data could impact stakeholder abilities to make informed comments on the Plan and evaluate performance of the program include:
 - The suitability of performance targets (e.g., recovery rates)
 - Data that demonstrate no obligated packaging and paper is detected in residential garbage

We look forward to working with you and the Recycle BC team on continuing to advance the management of packaging and paper product in British Columbia.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Paul Henderson'.

Paul Henderson, P.Eng.
General Manager, Solid Waste Services

PH/cu/ad



PEACE RIVER REGIONAL DISTRICT

December 12, 2022

5360.04

Recycle BC
405 – 221 West Esplanade
North Vancouver, BC

Via email: consultation@recycle.bc

Re: Feedback on Draft Packaging and Paper Product Extended Producer Responsibility Plan

Dear Sirs,

As part of the Peace River Regional District (PRRD) stakeholder feedback on Recycle BC's draft Packaging and Paper Product Extended Producer Responsibility Plan, the Regional Board would like to express its concern with the proposed Small Communities criteria.

RBC's proposed changes will drastically change the RBC program currently offered in the PRRD. More specifically, the PRRD's current RBC network of thirteen collection sites located at manned transfer stations will all fall under what will be the "Small Communities" criteria moving forward. Under this newly proposed small communities criteria, eleven of the thirteen collection locations, currently operated by the Regional District, will no longer meet the siting criteria and will potentially be closed. One of the eleven almost meets the criteria as defined, however, the community does not have a local grocery store and therefore does not meet the criteria either. As there is a great deal of uncertainty around how the criteria will roll out in the future with these existing sites, the PRRD is very concerned. Losing these sites would greatly impact the effective operation of the program for residents in rural regional districts such as ours.

The PRRD has approximately 63,000 residents living in 120,000km². The thirteen rural RBC collection sites that the PRRD manages are the only RBC depots in the Region. Currently, there are no RBC depots located in any of the member municipalities, leaving limited options for residents to participate in the program. In 2020, the PRRD invested over \$115,000 to purchase 9 large sheds at RBC's request to house the collected materials and support the program.

In 2021, the PRRD managed 4,517 tonnes of PPP recyclables, of that only 43.327 tonne (1%) was collected through the RBC program offered in the PRRD. In 2022, two local municipalities partnered with RBC for commingled curbside collection. As a result, it is anticipated that the tonnage collected in the region through the RBC program will increase by 1,200 tonne (27%) in 2023 thanks to those partnerships, however, there still is a large portion of PPP material that is being handled through the PRRD that would be eligible for the RBC program.

.../1

diverse. vast. abundant.

As part of the current RBC program, recovery goals are only looked at through a Province wide lens. This same methodology is proposed in the draft plan, and while it is appreciated that starting in 2023 non PPP items will be excluded from the recovery calculations, the PRRD would like to request that diversion and recovery targets for each respective regional district be included in RBC's program plan moving forward, so local goals and capture rates are understood.

The PRRD has four calls to action:

1. Provide confirmation that existing collection sites will be maintained moving forward, even if those sites do not meet the updated siting criteria.
2. Remove the requirement under Small Communities to have a permanent grocery store and consider the location of a gas station, rural school, or community hall as an alternative condition.
3. Reduce the Small Community Criteria drive distances from 40km from an incorporated municipality with a minimum population of 10,000 permanent residents or a Recycle BC Depot to 25km.
4. Include recovery and diversion targets and reporting for each of the Regional Districts in BC.

Yours truly,

Leonard Hiebert

Leonard Hiebert,
Chair

c. Dan Davies, North Peace MLA, Dan.Davies.MLA@leg.bc.ca

c. Mike Bernier, South Peace MLA, Mike.Bernier.MLA@leg.bc.ca

REPLY TO: prrd.dc@prrd.bc.ca



04/01/2023

Recycle BC

consultation@recyclebc.ca

extendedproducerresponsibility@gov.bc.ca

SUBJECT: Feedback in regard to the Packaging and Paper Product Extended Producer Responsibility Plan Consultation Draft

The qathet Regional District (qRD) Board identified two primary areas of concern in regard to the Recycle BC Consultation Draft Plan update. The first is the new proposed Small and Island Community depot criteria. The second is that there are no significant proposed changes to the current incentive methodology.

As the Draft Plan is currently written, there is no guarantee that existing qRD recycling depots keep their current status once contract agreements are up for renewal in 2024. Communications from RBC state that depots may be assessed on a case-by-case basis. It implies discretion on the part of RBC to determine if depots that no longer meet the new criteria will be grandfathered in, downgraded to satellite depots or eliminated from the program altogether. qRD has invested significantly to establish depots that meet the RBC standards set out within the contract agreements. The depots have been providing a high level of service to residents since the program commenced in 2014. We appreciate that RBC's intent is to maintain existing depots, but RBC needs to state in no uncertain terms that existing depots will continue to be recognized in contract agreements indefinitely, whether or not they meet the new criteria.

If RBC ceases to support existing depots that no longer meet the new criteria upon contract renewal, local government will be hard-pressed to remove these existing services. This could result in higher costs to taxpayers, disruptions or limits to service, and fixed investments could be left orphaned. Changing course on existing depots at this time in the program is unacceptable. It generates uncertainty and creates challenges for local governments' long-term budget planning and service delivery. There is also a potential of increased GHG emissions associated with longer drive times to access recycling services if established depots are no longer supported.

EPR by design is supposed to reduce local and Indigenous governments' waste management costs and make producers responsible for funding their recycling programs. This is currently not happening in the RBC program. qRD pays the bulk of the costs to operate the RBC recycling depots. The incentives provided by RBC for the various material types on average have been covering 27 percent of the operating costs of the depots. The financial incentive methodology should be revised to reflect the provincial objective of EPR.



Specifically, we offer the following feedback related to sections in the proposed Plan:

4.1 Program Delivery Principles -

- Maintaining current service levels and reasonable access to recycling inherently encourages participation. Removing depots is counter to RBC's Program Delivery Principles, specifically that of working towards continuous improvement in the recovery of materials and enhancing resident service levels.
- Program resiliency decreases as depots are removed, which counters RBC's Program Delivery Principles. The remaining depots will be required to handle and intake the new influx of material which they were not designed to handle.
- Local governments may not want to reduce existing service levels for residents and will end up paying increased costs to operate recycling depots.

4.3.5 Integrated Recycle BC Collection Services -

- The ambiguity of the proposed Plan eligibility criteria is unreasonable. There needs to be transparency and absolute clarity that existing depots will continue to be recognized in contract agreements moving forward.
- This ambiguity creates challenges for local governments in long-term budgetary and service delivery planning.
- Decreasing service and access can create barriers for residents and have impacts on regional diversion targets.
- Residents have developed recycling habits and have become accustomed to the current level of service, to remove access to depots and request that people make more effort in terms of drive time is taking a step backwards.
- The new Small or Island Community criteria states that to qualify, a community needs to have a permanent grocery store that is available and open year-round. The Plan does not, however, define what a grocery store is. A permanent grocery store should not be an indicator of whether a community should have access to recycling services and should be removed from the new Plan criteria.
- Volume generated should be included in the criteria that could override population size. If a community is able to generate a certain volume of recycling (as reasonably defined by RBC), there should be a consideration to enable service rather than solely basing it on population size and distance to an urban centre.

4.3.8 – Financial Incentive Methodology -

- The current incentive rates since the induction of the RBC program has continued to fall short of covering fair and reasonable collection costs.
- The incentives received from the collection of RBC materials have only covered between 14.87 and 27.94 percent of qRD operating costs.
- In order to meet the program standards and low contamination threshold set by RBC, qRD depots require staffing and infrastructure. At present qRD depots are operating at a minimum staffing capacity, are unheated, do not have plumbing, and occupy a minimum footprint size. At this time, we see no opportunity to reduce operational costs any further.



-
- The current financial incentive methodology being used needs to be revised to cover the fair and reasonable collection costs being borne by rural and remote communities and to provide economic incentive for maintaining this service. Costs associated with collections for satellite depots should be included as a consideration in cost studies.

Thank you for taking the time to review the feedback from the qRD on the Recycle BC Consultation Draft Plan.

Sincerely,

Clay Brander, Chair
qathet Regional District



December 21, 2022

Recycle BC
405-221 WEST ESPLANADE
North Vancouver, BC V7M 3J3
email: consultation@recyclebc.ca

Dear Recycle BC:

**RE: RECYCLE BC: PACKAGING AND PAPER PRODUCT EXTENDED PRODUCER RESPONSIBILITY PLAN
CONSULTATION DRAFT**

Thank you for this opportunity to provide comments on Recycle BC's latest draft plan for Packaging and Paper Product Extended Producer Responsibility. The Regional District of Central Kootenay operates a total of 22 principal and satellite depots across our district covering over 22,000 square kilometers and serving over 60,000 residents. More than half of these residents live in rural, unincorporated areas and small villages far from urban centres. Recycling is a prominent front-facing service in their eyes and generates a significant amount of comments and discussion for local governments. In addition to the environmental benefits of recycling there is a strong incentive for local governments to provide a robust collection service to residents. We recognize the important role RBC has in providing this service to all residents and hope that feedback from collectors is weighed appropriately when shaping the next five years of PPP recycling in British Columbia.

Comments from the RDCK on the draft plan follow under headings referencing specific sections of the plan.

3.3 Single-Use Products and Packaging-Like Products; 4.3.2 Accepted Materials

It is encouraging to see the range of materials accepted in RBC collection expand to include single-use and packaging-like products. This is an excellent, common sense approach that recognizes many depot and curbside users do not see any appreciable difference in packaging and packaging-like products. An aluminum tray purchased from a store for baking at home or one provided by a restaurant as a take-out container are equally recyclable and should be treated as such. Accepting these materials is an important step, although more effort should be made to manage these materials by methods higher on the Pollution Prevention Hierarchy. Many single-use items now included for recycling are supplied outside of the home to residents and are not likely to be transported back home for inclusion in recycling. Streetscape recycling has not been very effective at recovering items and reducing the supply of such items remains the best method for management.

4.3.8 Financial Incentive Methodology

Financial incentives paid to collectors are meant to "provide collectors with sufficient incentive to collect program materials" and "cover fair and reasonable collection costs". Current analysis and conversations with other local government collectors show that only between 20 to 30% of depot collection costs are covered by these incentives. Inflation, rising fuel and staff costs are likely to further reduce the portion of costs covered in 2023 and incentives are not set to be renewed until 2025. Under the current incentive structure this is not

sufficient to motivate collectors to provide recycling service aside from local governments that are accountable to residents. If covering fair and reasonable costs is the goal, then all of the operating costs incurred by principal depot operators should be covered and incentives adjusted annually as is common in other service agreements to account for increases in operating expenses. Further, while depot operating agreements with RBC allow collectors to be penalized financially for contamination there is no mechanism to reward collectors who provide clean recycling. Preventing contamination requires an investment in staff, education and appropriate infrastructure. This should be recognized in the incentives provided.

5.3.1 Program Recovery Rate; Appendix D – Proposed Performance Targets

Raising the target recovery rate to 80% is an important step forward for recycling in BC. Increased collection volumes are the only way to meet this target and should be an important driver to improve access to collection for all residents across the province. However, as BC is a large province with a majority of its population concentrated in Metro Vancouver and few other urban centres, the target recovery rate can be met for all of BC by serving those urban areas and providing minimal collection for residents elsewhere. To guarantee equitable service, each Regional District should have a minimum recovery target of 75% which can then be adjusted to more ambitious targets once several years of collection data are analyzed.

The removal of non-PPP from reported collection to net-out collection volumes and Recovery Rates is a welcome and important step to ensure the program is functioning well and reporting accurately on its performance. In this regard, the offset method of calculating recovery rate should also be evaluated and reconsidered as it has produced some misleading recovery rates for paper (101%) and glass (117%) in 2021. If the offset method continues to be presented in annual reports the Recovery Rate for that year should at least be updated in future reports when supply data becomes available and the updated rate used in determining future targets as well.

Appendix B – Curbside and Multi-Family Eligibility Criteria

Removing the required two-year period of curbside garbage collection before qualifying for curbside recycling service is a welcome addition to this draft plan. It will allow the RDCK and other Regional Districts to more effectively plan and consult with residents about establishing these services in a sustainable way.

Clarification around including ferry-accessed communities in curbside areas is needed for potential service areas in the RDCK and likely other interior districts. Proposed guidelines state that ferry-accessed communities must meet the requirements of an equivalent or adjacent unincorporated area on their own in order to qualify for service. This may be reasonable for coastal island communities where ferries run on intermittent schedules, require fares and crossings are 20 minutes or more plus loading and unloading time. Several communities in the RDCK such as Harrop-Procter and Glade are serviced by on-demand ferries, without fares and crossings that can be as little as five minutes and up to 20 minutes total depending on when a collection truck arrives at the ferry dock. Additionally, Harrop-Procter is located adjacent to a potential curbside area the RDCK will be exploring and Glade is located adjacent to an area of rural Castlegar that already receives curbside collection from RBC directly. These communities and others like them should be eligible for inclusion in curbside equivalency service areas provided they also meet the minimum household density of 0.42 households per hectare despite not having 5,000 residents.

Appendix C – Community Eligibility Criteria: Integrated Recycle BC Collection Services

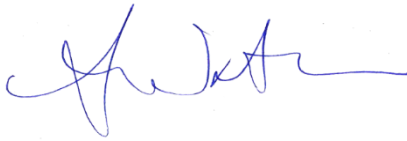
In order to provide recycling access to its residents the RDCK operates 10 satellite depots in communities that were not eligible for principal depots. The satellites receive no support from RBC aside from incentives for material collected. Under the proposed criteria the RDCK would lose five of its 12 principal depots and be forced to operate a total of 15 satellite depots to sustain current service levels. The five depots identified as

not meeting the proposed criteria serve the communities of Balfour, Crescent Valley, Crawford Bay, Slocan and Edgewood. Together they collect nearly 400 tonnes of PPP annually. If support from RBC was revoked, operating them as satellites could increase costs by an estimated \$250,000 a year due to new hauling arrangements. If these depots were closed much of that PPP would likely be disposed of at RDCK waste facilities serving those communities and the RDCK would have little to show for the investment of nearly \$200,000 in site improvements and collection infrastructure that was required to bring those locations up to RBC's standards.

All of the depots described above would not qualify under the proposed "Small Communities" eligibility criteria. Eliminating any existing depots does not meet RBC's program delivery principles which include the goal to "enhance resident service levels". Continuing to operate them as satellites would place an extra financial burden on the RDCK and not comply with the "producer pays" principle of EPR while in fact causing RDCK residents to pay twice for their recycling. These criteria should be re-evaluated with input from stakeholders with experience of the local conditions in these small communities and at the very least if these criteria are accepted existing depots should be grandfathered in under current collection agreements and all depots that been proven to collect a significant amount of recycling should likewise continue will full support from RBC.

We look forward to further consultation and development of Recycle BC's EPR plan to create a clear path forward for the diversion and recycling of the most common materials in British Columbia.

Sincerely,



Aimee Watson
RDCK Board Chair

AW/tb/sme

cc: Laurel Nash, Assistant Deputy Minister Ministry of Environment and Climate Change Strategy (email: laurel.nash@gov.bc.ca)
Ministry of Environment and Climate Change Strategy (email: extendedproducerresponsibility@gov.bc.ca)
Uli Wolf, General Manager of Environmental Services
Amy Wilson, Resource Recovery Manager
Travis Barrington, Resource Recovery Technician



Regional Waste Reduction Office

1450 K.L.O. Road
Kelowna, B.C. V1W 3Z4

Telephone: (250) 469-6250
Fax: (250) 762-7011
rdco.com

December 20, 2022

Recycle BC Draft Program Plan Feedback

To Whom it May Concern:

Thank you for the opportunity to comment on the September 29, 2022 Consultation Draft plan. The Regional District of Central Okanagan (RDCO) is made up of four member municipalities, City of Kelowna, City of West Kelowna, District of Lake Country, and District of Peachland as well as Electoral area East and Electoral Area West. Under a memorandum of understanding with its member municipalities, the RDCO provides all residential recycling education and outreach as well as manages contract relations with Recycle BC on behalf of its member municipalities.

Curbside recycling collection is contracted out across the region, to a single contractor who collects curbside recycling using single stream automated carts. In addition, the RDCO operates four Recycle BC depots, three at transfer stations and one at the regions only landfill (Glenmore landfill).

The following feedback is from the RDCO in consultation with the regions Solid Waste Technical Advisory Committee which is made up of staff from the RDCO and all member municipalities.

Section 2: Extended Producer Responsibility Agency

Producer Members

Recycle BC works with producers as defined under the Recycling Regulation for PPP, however there are exempt small producers whose material is still being managed by Recycle BC. We would like to see the Ministry work to improve this component of the legislation to ensure small producers are also paying their fair share and working towards using less problematic packaging. Perhaps Recycle BC has leverage to improve this situation.

Program Financing

We support financing models that encourage the use of easier to recycle PPP versus PPP that has little to no markets as well as financial models that encourage fibre-based packaging over plastic packaging. Is there opportunity to incorporate a fee structure that encourages more reuse or refill options for PPP rather than recycling?

Section 3: Packaging and Paper Product

We are pleased to see the inclusion of single-use products and packaging-like products included in the program. Much of this material is already being managed by Recycle BC and therefore great to see producers of this material will be paying into the program.

Section 4: Program Design

4.3.4 Multi-Family Collection

Multi-family recycling in the Central Okanagan is managed by private haulers and to our knowledge no buildings are currently being serviced through the Recycle BC program. According to the 2021 Census, 49.1% of dwellings in the Central Okanagan are single family homes. Priority is being given to more multifamily development in the region to meet housing needs. More work needs to be done by Recycle BC to capture residential PPP from the multi-family sector in the Central Okanagan. Residential PPP is being managed and paid for by private haulers and taxpayers living in multi-family residences.

Building owners or strata's should be able to opt in to the Recycle BC program rather than leaving it to private haulers to 'sign' up. Residents in our region are frustrated that their multi-family building does not have the same access to the Recycle BC program that single family residents do.

Incentives should be structured for private haulers to allow them to collect residential PPP and ICI on the same truck by using percentages. Private haulers know what percentage of their trucks contain multi-family building material.

There is opportunity for Recycle BC to provide direct service to multi-family buildings in conjunction with direct service to the region's single-family homes.

4.3.5 Integrated Recycle BC Collection Services and Community Eligibility Criteria

The RDCO has reviewed the new proposed eligibility criteria (Appendix C) and reviewed which depots in the region would be eligible under the new proposed criteria as provided by Recycle BC staff. While we are happy to see the District of Peachland and District of Lake Country would become eligible for depots under the new criteria, we are very concerned the new criteria could exclude many existing depots in our current network.

The following is a summary of existing depots and eligibility under the proposed new criteria (as provided by Recycle BC):

Depot	Community	Meets New Criteria
Glenmore Landfill Depot	Kelowna	Yes
North Westside Depot (NWS)	RDCO – Electoral Area West	No, if Trader's Cove removed then NWS would be eligible
Traders Cove Depot	RDCO – Electoral Area West	No
Westside Transfer Station Depot	West Kelowna	No
Planet Earth Recycling	West Kelowna (private depot)	No
Boucherie Bottle Depot	West Kelowna (private depot)	No
Columbia Bottle Depots (x3)	Kelowna (private depots)	Yes

While Recycle BC has stated verbally that these depots would likely continue, the criteria as written allows for Recycle BC to no longer support these depots.

Additionally, although Peachland would be eligible for a depot under the new criteria, the criteria does not guarantee that a depot would be sited in Peachland. Loss of depot eligibility in West Kelowna could mean Peachland residents would have to travel a minimum of 18 km to the nearest eligible depot in Kelowna.

The following is a list of concerns related to existing depots becoming ineligible under the new proposed criteria:

1. Once ineligible, local governments operating recycling depots would be burdened with significant costs that should be the responsibility of producers. The closure of government run recycling depots at recycling and waste disposal hubs in our communities is not an acceptable option.
2. The population on the westside of Okanagan Lake (West Kelowna, Peachland, Westbank First Nations, RDCO Electoral area West) is 55,664 and under the new eligibility criteria, this population would be required to drive into Kelowna for depot services, contributing to the already very congested commute into Kelowna.
3. Residents of the City of West Kelowna have access to all other required amenities within the city boundaries and may not travel outside of their city to recycle.
4. The proposed reduction in service would likely contribute to cart contamination, as residents would add previously collected depot only material into their curbside carts.

Recommendations:

- Recycle BC should be increasing service overall in areas that are under served, not decreasing service in areas that are already well served.
- Recycle BC needs to work with more local retailers to increase collection capacity in grocery stores, drug stores etc. for depot only PPP. This could fill the gaps in communities such as Peachland and Lake Country who currently do not have depots for depot only material.
- Eligibility criteria should take into consideration the existing network of depots and grandfather them in regardless of whether they meet the new proposed criteria or not.
- Criteria should include having depots at staffed transfer stations and landfills where regular disposal for other material is already taking place.
- Criteria should ensure depots are accessible in communities where there is no curbside collection, co-locating depots with transfer stations.
- Recycle BC should continue to innovate ways to make recycling easier for all including pursuing expansion of depot only material collected curbside.
- Recycle BC should explore opt-in recycling services at curbside, partially funded and administered by Municipalities as a convenient alternative to depot only collection.

4.3.6 First Nations Collection

Westbank First Nations (WFN) is adjacent to the City of West Kelowna (currently being serviced through a Recycle BC partnership). It is unclear if they would be required to meet the eligibility for adjacent areas criteria in the plan. Westbank First Nations meets all proposed eligibility criteria except for having a curbside garbage collection program in place. WFN currently has 4215 dwellings (approximately 1559 single family homes and 1559 mobile homes and the rest in multi-family).

The criteria for garbage collection to be in place unnecessarily limits Recycle BC's support for this First Nation. The RDCO hopes that this area would not be excluded from eligibility only because it does not have garbage collection. Serving these homes could be a simple extension to direct service that Recycle BC will be undertaking in the region in 2026, and we recommend Recycle BC engage directly with WFN.

4.3.7 Streetscape Collection

It has been noted in the plan that Recycle BC is working on a baseline standard for collection contamination threshold for entering the Recycle BC streetscape program. While the plan does not outline what this threshold may be, given our experience with contamination remediation in curbside carts, we would like to see this baseline much higher than 3% currently in the Statement of Work. Our concern is this baseline requirement will not incentivize local and First Nations governments to partner with Recycle BC. Recycle BC streetscape program should be fully funded by Recycle BC to incentivize a partnership for the collection of this material.

4.3.8 Financial Incentive Methodology

We understand how Recycle BC determines financial incentives and offers to collectors. Of concern is the statement:

"Once new collection service agreements have been published inclusive of the revised financial incentives, each applicable collector must then decide whether to renew its collection service agreement with Recycle BC."

It would be difficult for local government to not continue partnering with Recycle BC once that has been established as it would mean taking on the full responsibility of all costs, transport, market etc. The take it or leave it approach leaves significant power with Recycle BC rather than a partnership with collectors. Recycle BC must ensure incentives cover the true cost that local government and private depots are facing to manage PPP on their behalf. For example, Recycle BC's incentives for depots does not cover the full cost for the RDCO to run PPP depots.

The plan mentions "Costs associated with collection in communities that do not meet the eligibility criteria outlined in Appendix C, including the operation of applicable depots and satellite depots, will be excluded from collection costs studies."

These costs are important for Recycle BC and producers to understand. They are costs taken on by local government for managing PPP that should be the responsibility of producers. Leaving this information out of a cost study will skew Recycle BC's understanding of the true cost to manage PPP across the province.

Pop-up depots have been suggested to bridge gaps in service and the Central Okanagan plans to continue to host pop-ups in eligible communities such as Lake Country until a permanent depot can be found in order to reduce depot only material going into curbside carts. Recycle BC should provide additional incentives to support these collection events.

4.6 Communication

Recycle BC needs to produce more collector resources that support partners who have single stream automated collection. Most of the collector resource material currently being produced is multi-stream focused and not usable for communities with single stream collection.

More work needs to be done by Recycle BC to get more communities aware of the program and build understanding of who is truly responsible for PPP in British Columbia. Per capita metrics within the program inherently favours programming that targets a smaller number of communities, and leads to challenges in communities where service differs from densely populated areas.

5. Program Performance

5.3.1 Program Recovery Rates

The program has a 75% recovery rate as laid out by the Ministry. Given Recycle BC has met or exceeded this target since the inception of the program we would like to see more aggressive target of at least 85% for 2023. The current approach inherently favours programming that targets one or two dense population centers, as metrics can be reached exclusively through them.

We agree with the proposal to exclude non-PPP that is collected in the overall recovery rate. This should not have been included from the beginning.

While we understand why there is a lag information reported by producers to the time Recycle BC can review and report on recovery, we would like to see work done to shorten the lag-time below 2 years.

5.3.2 Material Category Performance Targets

We would like to see more aggressive targets for plastics recovery. 71% by 2025 for rigid plastics should be increased to 75% and target for flexible plastics should be increased significantly.

Other

We would like to see more metrics on the amount of PPP ending up in Landfills (through waste composition study results) and therefore being managed by local governments.

More effort needs to be put into eliminating or reducing hard-to-recover packaging or products, in favour of more recyclable or durable goods.

The RDCO has expressed interest in going beyond the baseline program offered by Recycle BC. But, without access to Recycle BC's supply chain and recyclers, the effort and cost to 'go it alone' stall or stop those interests. Recycle BC needs to do more to support the recycling of additional commodities at curbside, communities are willing to pay their fair share for convenience.

From: Kevin Paterson [REDACTED]
Sent: December 19, 2022 2:38 PM
To: Recycle BC Consultation
Cc: ExtendedProducerResponsibility@gov.bc.ca
Subject: Regional District of East Kootenay - Comment on RBC Draft Plan
Attachments: RDEK Comment on Recycle BC's Draft EPR Plan.pdf

CAUTION: This email originated from outside of the organization.

To Whom it may concern.

The Regional District of East Kootenay (RDEK) would like to provide comment on Recycle BC's Draft Plan. At the December Board Meeting, the attached Request for Decision was presented and the following resolution 50776 was passed:

THAT the Regional District of East Kootenay provide comment on Recycle BC's 2022 Draft Plan outlining the concerns stated in the November 28, 2022 Request for Decision.

The key items in Recycle BC's Draft EPR Plan that the RDEK would like to provide comment on are related to the criteria for curbside and depot services. The RDEK has partnered with Recycle BC to offer primary depots at six (6) locations in the RDEK to great success. In 2021, the City of Cranbrook and City of Kimberley also partnered with Recycle BC to offer curbside collection of PPP materials. The data shows that by having both a depot and curbside collection the collection of PPP materials increased overall in Cranbrook and Kimberley with the two delivery options running concurrently.

As other municipalities have seen the success of these curbside offerings in addition to depot locations, they have shown interest in also providing the service. However, when Recycle BC was asked if the RDEK and District of Sparwood could form a partnership to meet Recycle BC's threshold for curbside (population of 5,000) the answer was no when applying the 2022 draft criteria. This limiting criteria goes directly against Recycle BC's Delivery Principles:

- Focus on outcomes, not process – maximize recovery, maximize efficiency, and enhance resident service levels while minimizing complexity;
- Foster interaction, collaboration and competition to drive innovation – innovation is the result of complex interactions of ideas and efforts among producers and private, public and not for-profit entities with parties bringing together complimentary skills to collaborate and deliver more value;
- Set the stage for evolution – harness existing activities and build on success through continuous improvement and use of economic incentives to increase collection of PPP and improve system efficiency.

The RDEK can appreciate that the criteria for new services tries to encapsulate British Columbia as a whole. However, when regional districts are responsible for solid waste management within their region, EPR Programs should seek them out as a primary source for understanding their population and service gaps instead of a standardized criteria that covers the province as a whole. As each regional district is different, and local government strive to offer additional services to residents, the option for flexibility is needed for all EPR Programs. Recycle BC's draft criteria fails to provide options for partnerships and collaboration with local

governments that serve to work towards the same goal of reducing EPR Program products going to landfill and associated costs.

Kevin Paterson

Environmental Services Manager
Regional District of East Kootenay
19-24th Avenue South
Cranbrook, BC
VIC 3H8
250-489-2791
Fax: 250-489-3498



Please consider the environment before printing this email and any attachments

December 15, 2022

Recycle BC
405-221 West Esplanade
North Vancouver BC

Sent by Email: consultation@recyclebc.ca

Dear Recycle BC,

Re: Comments on Recycle BC Packaging and Printed Paper Extended Producer Responsibility Plan – Consultation Draft, September 29, 2022

On behalf of the Board of the Regional District of Kootenay Boundary, thank you very much for the opportunity to provide feedback on the Packaging and Printed Paper Extended Producer Responsibility Plan – Consultation Draft, September 29, 2022 document (Draft Program Plan). The Board discussed the draft at its meeting yesterday and has serious concerns which are outlined below.

Background

The RDKB operates four Recycle BC depots for the collection of residential recycling at the McKelvey Creek Landfill (Trail), Christina Lake Transfer Station, West Boundary Landfill (Greenwood) and Rock Creek Transfer Station. A private depot is located in Grand Forks.

The RDKB also operates a depot at the Beaverdell Transfer Station, which collects packaging and printed paper materials from residential sources. It is not funded by Recycle BC, even though for many years we have requested that this depot be included in our agreement.

Under your EPR program, Recycle BC is responsible for costs associated with collection, transportation, processing, etc. The RDKB is paid a financial incentive based on a per tonnage rate, to offset operational costs at the collection depot. However, the incentive is not sufficient to cover actual depot costs.

Key Points and Associated Comments Identified in the Draft Program Plan:

1. Definition of Packaging and Printed Paper and Impacts of the 2020 amendments to BC Recycling Regulation

- Beginning January 1, 2023, additional materials, including designated single-use products and designated packaging-like products, will be included in the definition of packaging and printed paper products.
- Comments:

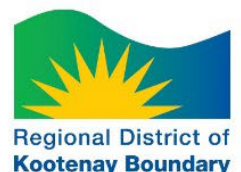
Main

202 – 843 Rossland Avenue
Trail, BC V1R 4S8
T: 250.368.9148
T/F: 1.800.355.7352
F: 250.368.3990

Grand Forks

2140 Central Avenue; Box 1965
Grand Forks, BC V0H 1H0
T: 250.442.2708
T/F: 1.877.520.7352
F: 250.442.2688

rdkb.com



- The definition of Packaging and Printed Paper encompasses a varied and significant product list for which materials are regularly and frequently purchased by residential customers and require frequent and ongoing access to recycling options.
- The collection of the most challenging products and those with the most significant and harmful impacts to the environment are completed primarily through the use of depot collection.
- The addition of these products to the BC Recycling Regulation is fully supported, and it is appreciated that Recycle BC is taking on the collection of these products.
- It is essential to maintain and or even expand the depot collection network to ensure that these problematic plastic products are collected appropriately for recycling.

2. New community eligibility criteria for Integrated Recycle BC Collection Services are being proposed, which apply to both new and existing depots.

- Taken directly From the Draft Program Plan:
 - "At present, depot collection service (whether combined with curbside and multi-family collection or as a stand-alone service) is the primary method through which Recycle BC provides Integrated Recycle BC Collection Services."
 - "Recycle BC will honour existing depot agreements with collectors that provide collection services in communities that do not meet the eligibility criteria outlined in Appendix C but may not take steps to replace this service if the current collection partner decides to no longer provide this service."
 - "Recycle BC will also permit local governments to establish and operate satellite depots in communities that do not meet the eligibility criteria outlined in Appendix C, subject to Recycle BC review and approval. A satellite depot is an approved depot operating to specific standards, from which the collector (depot operator) transports the PPP to their principal depot for pick-up by the designated post-collection service provider."
- Comments:
 - As a result of the new criteria, a significant number of Recycle BC depots operated by local governments across the province are at risk of being eliminated from the program once existing agreements expire, including two in the Boundary region of the RDKB.
 - Should these depots be closed, it will create cascading impacts to surrounding depots, which may not be able to appropriately manage the additional materials. For example: increased traffic and line ups, greater volumes of materials to process, and complaints due to limited hours of operation, especially from residents who have had to travel 40km to access recycling opportunities.

- Closure of depots will also have the following unintended (or maybe intended) consequences: transfer of greenhouse gas emissions and fuel costs to residents and local governments.
- How exactly did Recycle BC determine that a 40km distance from an established depot was a reasonable distance to travel for recycling opportunities? If a resident has a grocery store (or equivalent place to purchase PPP) in their community, should they not be provided an equal opportunity for recycling?
- Utilizing population statistics in determining service level provision may not be a representative way of determining depot viability. We would like to see a breakdown of all of the depots across BC and the tonnages that have historically been diverted through these depots.

3. Financial Incentive Methodology

- Taken directly from the Draft Program Plan:
 - "Costs associated with collection in communities that do not meet the eligibility criteria outlined in Appendix C, including the operation of applicable depots and satellite depots, will be excluded from collection cost studies."
 - "Once new collection service agreements have been published inclusive of the revised financial incentives, each applicable collector must then decide whether to renew its collection service agreement with Recycle BC."
- Comments:
 - It could be argued that the collection costs for existing depots that do not meet the eligibility criteria in Appendix C are higher than depots that would meet the criteria. Assuming costs are presented on a \$/tonne basis, and considering fixed costs of depot operation, those depots that collect lower tonnages would have higher operational costs. These costs will no longer be considered in collection cost studies.
 - Although Recycle BC has indicated an intent to honor existing depot agreements for those depots that do not meet the eligibility criteria, the language in the current Draft Program Plan would potentially allow Recycle BC to offer incentive rates that are significantly lower than would be acceptable to existing depots.
 - Once a depot has been established in a community it is almost impossible to remove that service without significant impact to residents. A local government would be placed in the position of having to accept the incentive rates from Recycle BC and ultimately pay a greater portion of the depot operating costs.
 - Should a private depot choose to not accept the incentives offered by Recycle BC, this would result in the local government having to step in to establish a satellite depot, wherein even more costs (capital, operations, transportation) are paid for by the general taxpayer. In addition, the local

government would also be obligated to track and report on the resulting green house gas emissions.

- The Recycle BC Program is already not a full producer-pay program and in essence, Recycle BC is setting up the ability to further transition costs to the taxpayer for the collection and recycling of packaging and printed paper. This is in direct conflict with the basic principle behind the BC Recycling Regulation.

4. Performance Targets

- Comments:
 - We appreciate that Recycle BC has been transparent in identifying the historical method for calculating recovery rate and the inclusion of collected non-program materials (garbage) in this analysis.
 - Looking at the program recovery rates presented in Appendix D of the Draft Program Plan, it appears that garbage (non-PPP) has been utilized in the past to inflate the recovery rate achieved for program materials. If garbage is removed from the calculation, Recycle BC did not meet the required 75% recovery rate for the years 2016-2019, as is legislated in the BC Recycling Regulation. While we appreciate that moving forward is potentially more important than focussing on the past, this accounting practice should be clearly addressed by the Ministry of Environment and Climate Change, to ensure that all Stewardship programs have a clear and equal understanding of how recovery rates are calculated and that all expectations are met. From a public perspective, the inclusion of non-product materials to artificially inflate recovery numbers creates a lack of trust in the system.
 - The RDKB supports the transition to utilizing an “Aligned RR methodology”.
 - Recycle BC proposed recovery rates are dismal for the “hard to manage and collect” materials such as Styrofoam and flexible plastics. Furthermore, the majority of these types of materials cannot be effectively collected at curbside; as such, an extensive and comprehensive depot network is required to minimize the environmental impacts of mismanagement of this product.
 - In looking at the performance targets set, it seems that Recycle BC is setting the highest target rates for those products that are the easiest to collect (curbside) and have the greatest and most consistent market value. While it is appreciated that the market value of the products collected does have financial influence on program funding, more focus and effort (in the commitment to higher targets) should be put toward the collection of plastic film and Styrofoam products that have the greatest environmental impact when not managed properly. Given all the controversy and concerns surrounding plastic pollution, a proposed target of 25% by 2027 for Flexible Plastic would be viewed by many as sub-standard at best, especially since the previous target was 27% by 2023.

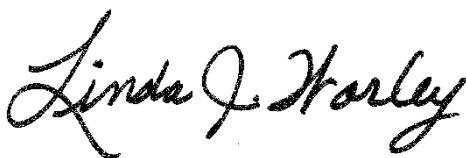
- Please confirm that the material category performance targets will be calculated similarly to the program recovery target in that collected “garbage” will not be utilized to arbitrarily inflate the recovery numbers.

5. General Comments

- The addition of single-use packaging and packaging-like products will increase the amount of materials generated by residents to be recycled. This is viewed as a positive; however, the accessibility outlined in the Draft Program Plan is far from adequate to provide reasonable access to recycling services.
- It is unacceptable for Recycle BC to reduce the depot collection network that already exists. The goal of continuous improvement should not be for Stewards to figure out innovative ways of transitioning costs back to the taxpayer.
- In various areas of the document, the language “reduce green house gas emissions” is utilized, but with no supporting evidence or examples of how this is to be achieved. It is suggested that greater clarity be provided around this, as one could interpret the potential closure of depots or transition of transportation requirements to local governments as one methodology being utilized. It would be more acceptable to have language such as “encouraging the use of electric or RNG vehicles for transportation as much as possible”
- Overall, the Draft Program Plan as currently worded does not meet the Program Delivery Principle of “enhance resident service levels”.

Thank you for the opportunity to provide comments. The RDKB looks forward to reviewing future versions of the Draft Program Plan wherein changes are made to adequately address the concerns identified in this letter.

Sincerely,



Linda Worley
Board Chair

cc Mark Andison, CAO
Janine Dougall, General Manager of Environmental Services
Roly Russell, MLA—Boundary Similkameen
Katrine Conroy, MLA—Kootenay West
Ministry of Environment and Climate Change (Email: extendedproducerresponsibility@gov.bc.ca)



Our File No. 5360-04-31

December 28, 2022

Recycle BC
405-221 West Esplanade
North Vancouver, BC
V7M 3J3

Via email : consultation@recyclebc.ca

Dear Sir/ Madame.

Re:
Request for Input on Recycle BC Stewardship Plan Update

The Regional District of Kitimat-Stikine (RDKS) welcomes the opportunity to provide input to Recycle BC regarding the Packaging and Paper Product Extended Producer Responsibility Plan (Program Plan). The following comments are provided with the intent of assisting the development of the new Program Plan. These comments are broken down by the corresponding section found in the Program Plan.

4.1) Program Plan Delivery Principles

While the RDKS agrees with Recycle BC's overarching goal for "continuous improvement in recovery effectiveness and efficiency...", there are concerns in its approach to achieving this. The RDKS believes that, should Recycle BC move forward on its adjustments to the "Integrated Recycle BC Collection Services" that this will be contrary to the overarching goal. Maintaining and expanding existing services is crucial to encouraging participation in the program. Should local governments have to assume full costs for local recycling programs, trust and participation in the program will diminish.

Furthermore, by potentially removing current depots from the program, the resiliency of the Recycle BC program will be diminished. This is particularly relevant in communities in northern BC, where Recycle BC depots are often few and far apart. Reducing depot drop off points will only weaken the overall system.

4.3.5) Integrated Recycle BC Collection Services

The RDKS does not agree with Recycle BC's current proposed approach to collection services. The ambiguous language that is currently used in the Program Plan is unreasonable.

The proposed criteria regarding community eligibility for Recycle BC collection services cite a "case by case" assessment for eligibility for current depots that fail to meet the proposed new criteria. This "case by case" assessment currently has no defining terms as to what this may mean. This ambiguity will pose numerous challenges to local governments when undergoing long term planning for recycling and other solid waste services. Without guarantees that existing depots will remain in service by Recycle BC, local governments may face financial budgeting issues.



Should existing depots lose Recycle BC support, this will also result in reduced trust in the program as well as the associated local government which will need to take over the service. With the increasing costs of living affecting all Canadians, increasing service-related costs will be negatively received amongst affected communities.

The RDKS also has concerns in Recycle BC's proposed criteria of requirements for small communities. The current proposed plan highlights the requirement that "A permanent grocery store is available and open year-round" yet it does not define what constitutes a permanent grocery store. This requirement raises questions on what happens to the community eligibility should these grocery stores close due to extraneous forces.

Recycle BC should also consider the inclusion of volume generated in its collection services criteria alongside population as its primary metric for services. Communities around BC recycle at varying rates and have different exposure to the program. Communities that are showing high participation rates in recycling should be considered when assessing eligibility.

Under this new agreement, the RDKS stands to lose its depot status at the Stewart Transfer Station and potentially at the Kitwanga Transfer Station as well. This revocation of depot status is unacceptable as it runs counter to Recycle BC's Program Plan Delivery Principles.

4.3.8) Financial Incentive Methodology

The RDKS does not believe the current incentive structures are fair and reasonable in subsidizing collection costs. In recent years, costs have increased significantly across all industries including facility operational costs.

The current financial incentives provided by Recycle BC are not adequate in reasonably reducing these costs to collection. EPR programs are designed and intended to reduce local governments management costs and to make producers responsible for funding their recycling programs. With increasing operating costs at all levels, these incentives are failing to offset costs.

In conclusion, the RDKS has a number of concerns in Recycle BC's proposed Packaging and Paper Product Extended Producer Responsibility plan. The potential to lose existing depots under this new program is unacceptable and runs counter to Recycle BC's own mission statement.

The RDKS is thankful for the opportunity to provide feedback to your request for input.

Yours Truly,

Kieran Griffith
Zero Waste Coordinator



Regional District of Mount Waddington

PO Box 729 2044 McNeill Road, Port McNeill, BC V0N 2R0

Telephone (250) 956-3161 Fax (250) 956-3232

Web-site: www.rdmw.bc.ca Email: info@rdmw.bc.ca

File No. 310.01/5380.01

December 29, 2022

Recycle BC
405-221 West Esplanade
North Vancouver, BC V7M 3J3

consultation@recyclebc.ca.

The following letter is the Regional District of Mount Waddington's (RDMW) response to Recycle BC's draft new Packaging and Paper Product Extended Producer Responsibility Plan (2022 Program Plan). The structure of this response letter is to provide context regarding recycling in the RDMW and followed by an itemized review of the proposed 2022 Program Plan's changes from the existing plan.

The RDMW is located on the very north end of Vancouver Island plus a large land base on the mainland. The total population is under 11,000 made up of small communities, none of whose population exceeds 5,000 and most are under 1,000. Many of these communities can only be accessed by logging roads or ferries and some are water access only with no ferry service. Solid waste management is centered on 7 Mile Landfill and Recycling Center (7MLRC) with only the community of Holberg not taking its waste there.

Since the inception of Multi Material BC (MMBC), Recycle BC's predecessor, the RDMW has established an extensive recycling program with either curbside collection or eco-depot facilities servicing practically every community. This community focused delivery model was key in the RDMW's efforts of convincing small remote communities to voluntarily forsaking the use of illegal dumps and transporting their wastes to 7MLRC with its proper environmental resources. These efforts were supported by the Provincial Government in its efforts to raise the practices of solid waste management in remote rural communities. To accomplish this effort, the RDMW incurred significant costs in the construction of eco-depot facilities in remote locations such as Sointula, Woss, Quatsino and Winter Harbour. It should also be noted that the RDMW has mentored and advocated for First Nation Communities such as Klemtu, Bella Bella, Wuikinuxv and the Tsulquate Reserve.

The 2022 Program Plan has several positive changes and some that are of concern for the RDMW. The changes noted in this letter are as follows:

The Inclusion Of Designated Single-Use Products As Defined By The 2020 Amendments To The BC Recycling Regulation

The RDMW supports this change as the products being added are often added to the curbside and depot collection intakes. It will ease trying to communicate to the public what materials can be accepted.



INCORPORATED JUNE 13, 1966

MUNICIPALITIES: VILLAGE OF ALERT BAY, VILLAGE OF PORT ALICE, DISTRICT OF PORT HARDY, TOWN OF PORT MCNEILL
ELECTORAL AREAS: "A" (BROUGHTON ARCHIPELAGO, SOINTULA / MALCOLM ISLAND, MAINLAND); "B" (COAL HARBOUR, HOLBERG, QUATSINO, WINTER HARBOUR);
"C" (FORT RUPERT, HYDE CREEK, TSULQUATE); "D" (CORMORANT ISLAND, TELEGRAPH COVE, WOSS)

The Inclusion Of Designated Packaging-Like Products As Defined 2020 Amendments To The BC Recycling Regulation

The RDMW supports this change as the products being added are often added to the curbside and depot collection intakes. It will ease trying to communicate to the public what materials can be accepted. For example, it has been a source of frustration for attendants try to explain why some corrugated cardboard items can be accepted while objects of identical constituents are not. For some clients, the perceived inconsistency has undermined confidence in recycling.

Community Eligibility Criteria: Integrated Recycle BC Collection Services

The RDMW is very concerned about the application of the Community Eligibility Criteria (CEC) as it is discriminatory for very small remote communities such as those that predominantly make up the RDMW. It should be noted that the RDMW from the very onset used Multi Material BC to bring effective recycling to most our communities including the smallest ones, so the Regional District has little at risk given Recycle BC's commitment to:

"...honour existing depot agreements with collectors that provide collection services in communities that do not meet the eligibility criteria outlined in Appendix C but may not take steps to replace this service if the current collection partner decides to no longer provide this service."

This commitment provides reassurance that the RDMW's past investments are not in peril. Should this commitment be potentially set aside, the RDMW would protest vigorously.

Where the RDMW has concern is that there are small communities of less than 1000 population, who are currently under serviced regarding recycling. Many of these communities are in remote locations which results in limited occasions where households can do their recycling in larger centers. The RDMW experience in communities such as Port Alice, Sointula, Winter Harbour, Quatsino, etc. demonstrate the resident's commitment to diverting materials from the waste stream. On a per capita basis, their diversion rates often exceed that of our larger communities who have curbside collection of recyclables. They also demonstrate a financial commitment as the operational recycling costs funded by fees and tax requisition exceed the subsidies provided by Recycle BC. These communities understand the increased costs of incurred by Recycle BC to service their communities and the existing compensation models provided by Recycle BC are considered acceptable in the RDMW.

Another issue with the CEC is it clashes with Recycle BC's First Nations Recycling Initiative. Personal experience has demonstrated Recycle BC's willingness to work with First Nation communities to establish recycling services but most of the aboriginal communities would likely not be eligible for services as they have populations less than 1000 residents. Given the high priority set in the last decade to improve community health by establishing effective solid waste programs, having these communities join in Extended Producer Responsibility programs is imperative.

The RDMW would also like to highlight the challenges incurred when Multi Material BC started its operations that resulted in some small communities not joining the program initially. At the time when communities were offered the service, the contractual obligations, particularly the penalties for none performance, were very onerous and initially there was no scaling for community size.



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A village of 200 would face the same magnitude of fines as a city the size of Vancouver. This lack of scale made many small communities both First Nation and Non balk at signing an agreement with MMBC. Recognizing this problem, the RDMW engaged with MMBC and a scale factor was amended into the agreements but unfortunately given time constraints, a number of small communities did not join the program by the deadline with many still left on the outside.

It is the RDMW recommendation that if a community meets the following criteria no matter what its size, it should be eligible for Integrated Recycle BC Collection Services:

- A local organization is willing and able to provide collection services that meet all program requirements and collection standards.
- Garbage service is available to residents, which may include a landfill, drop-off transfer point or curbside service.
- The community is located more than a 40 km drive from a Recycle BC depot, as measured from the closest Recycle BC depot to a central location within the commercial center of the community (or its closest approximation).

For water or air access only communities, they should be eligible for Integrated Recycle BC Collection Services if:

- A local organization is willing and able to provide collection services that meet all program requirements and collection standards.
- Garbage service is available to island residents, which may include a landfill, drop-off transfer point, private curbside service or local government curbside service; and

As mentioned earlier, despite the subsidies provided by Recycle BC, the brunt of the cost falls on communities no matter their size or location but this is disproportionately so for smaller or remote communities. This reality is even greater when the initial infrastructure costs required to meet Recycle BC's program requirements are factored in.

In conclusion, Recycle BC's expansion of materials that will be accepted in its program as described in its 2022 Program Plan are welcomed and will ease the public's utilization of its supported services. The Community Eligibility Criteria also embedded in the 2022 Program Plan is unfortunately problematic as it is discriminatory for very small remote communities

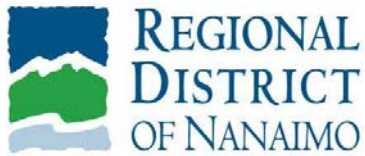
Respectfully


Patrick Donaghy
Operations Manager, Regional District of Mount Waddington



INCORPORATED JUNE 13, 1966

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January 17, 2023

Bob McDonald
Minister of Environment and Climate Change Strategy
Director, Extended Producer Responsibility
PO Box 9341 Stn Prov Govt
Victoria, BC V8W 9M1

Recycle BC
Executive Director
405-221 West Esplanade
North Vancouver, BC V7M 3J3

Re: Recycle BC Program Plan, Multi-family definition

Thank you for the opportunity to provide feedback on Recycle BC's upcoming program plan. The Regional District of Nanaimo's (RDN) Solid Waste Management Plan has a goal of 90% diversion of waste from Landfill and the success of that does partially rely on new and existing EPR programs and increased services to our residents by these programs.

In the Recycle BC program plan, Multi-family collection is defined as the collection of PPP from residential complexes with five or more units where all households deposit their recycling at a centralized location in shared containers.

The RDN does not believe that this is an appropriate definition for multi-family collection. It is our understanding (as confirmed by Recycle BC staff) that this definition implies that those residents that live in a strata complex, and receive private collection of recycling at their home, instead of a centralized location, will not qualify to receive the Recycle BC incentive. This definition is counterproductive to Recycle BC and the provinces goals of increasing the amount and quality of material that is recycled. It will also negatively affect those regions, like the RDN, that are working towards a mandatory waste source separation regulation, which would require multi-family homes to have recycling collection. Based on this definition, many would not qualify for the Recycle BC program, even though the products that they have purchased, and are trying to recycle, are from the Recycle BC program.

It has been proven that more people will recycle if it's easy to do so. By having recycling collection at each home in a strata, rather than at a centralized location, it becomes easier for residents to recycle. At the same time, with residence-based recycling, its easier for the collector to conduct bin checks and ensure that the recycling is free of contamination. It also makes it easier to educate, and if necessary, penalize residents that aren't recycling properly. Centralized locations for recycling are also notorious for having some of the highest contamination rates for recycling, because of the level of anonymity this type of collection allows.

We understand that the reason for this definition is because Recycle BC believes that if a multi-family is receiving curbside collection, similar to local government provided single family collection that is provided in their region, that the multi-family should also be collected in the single-family collection. However, in the case of the RDN and other municipalities and regional districts, there are a number of multi-family homes that due to their configuration (street width, private driveways, sprinkler systems), cannot safely receive the same service provided by the local government to single-family homes.

It is our opinion that it is unacceptable for Recycle BC to choose to leave residents of multi-family dwellings without the same incentives as single-family dwellings. Like much of this program plan, it seems this definition is drafted in a way that best applies to the Metro Vancouver area where most of the multi-family homes already have centralized collection. However, medium sized regional districts, like the RDN and many others across BC, have a number of small strata complexes that look similar to single family homes but receive recycling collection from a private waste collector. It would be a shame to have such locations mix their recycling in a single bin to allow entry to the Recycle BC system. We believe that Recycle BC is obligated to collect recycling from residential sources in BC, and installing barriers through arbitrary definitions reduces their obligation. Frankly we believe this does not serve the higher purpose of recycling, to increase diversion, reduce the negative impacts to the natural environment, and provide greater levels of service to the residents of BC.

Our recommendation is that this definition be changed to:

Multi-family collection is defined as the collection of Printed Paper and Packaging from residential complexes with five or more units.

Or, operationally, that Recycle BC accept that when the recyclable material is collection from a multi-family building that has separate containers for recycling at each home, that when they are combined by the collection truck, that the truck be considered a centralized location.

Sincerely,



Ben Routledge
Manager, Solid Waste Services
Regional District of Nanaimo





REGIONAL DISTRICT NORTH OKANAGAN

MEMBER MUNICIPALITIES:

CITY OF ARMSTRONG

CITY OF ENDERBY

DISTRICT OF COLDSTREAM

VILLAGE OF LUMBY

CITY OF VERNON

TOWNSHIP OF SPALLUMCHEEN

ELECTORAL AREAS:

"B" – SWAN LAKE

"C" – BX DISTRICT

"D" – LUMBY (RURAL)

"E" – CHERRYVILLE

"F" – ENDERBY (RURAL)

OFFICE OF: COMMUNITY SERVICES

OUR FILE No.: 4900.04.19

December 20, 2022

VIA EMAIL

Recycle BC
consultation@recyclebc.ca

Re: Recycle BC Draft 2022 Packaging and Paper Product Extended Producer Responsibility Program Plan

Thank you for the opportunity to provide feedback on Recycle BC's Draft 2022 Packaging and Paper Product Extended Producer Responsibility Program Plan.

Recycle BC's progress in the last eight years provides an excellent platform for increasing opportunities for BC residents to reduce their Packaging and Paper Product (PPP) Waste. However RDNO staff feel that the draft Program Plan has elements that puts this growth and past progress into question.

This feedback presents 5 key priorities that RDNO staff have identified for making sure that Recycle BC takes responsibility for the life cycle of the PPP their members generate.

Higher Recovery Rate for Plastic is Needed

Recycle BC Recovery Rates and Targets for Paper, Metal and Glass material streams impressively exceed the expected standard of 75% stated in the BC Recycling Regulation. These recovery rates help support total program recovery rates by weight, however these materials tend to have a much higher density than plastics. Plastic packaging is a highly ubiquitous PPP material as well as a major source of environmental pollution and waste in our landfills.

Plastic waste and pollution prevention should be a major priority for Recycle BC. For the Plastic material stream, the recovery rates are alarming low (55% in 2021) and the 2025 target for a 58% recovery rate is harmfully inadequate. Over 1/3 of all plastics produced are used in packaging. Plastic pollution is everywhere in the environment and the physical harm macroplastics have on animals and their habitat have been well documented. With many stakeholders, including government and industry taking urgent positions to reduce plastic pollution, Recycle BC and its members have the opportunity to play a much more significant role in addressing the amount of plastic landfilled and polluting our environment. Consideration of a target of at least a 75% Plastic Recovery Rate, across the whole province, that aligns with the 75% program standard should be the minimum target set for Plastic in this plan.

Subject: Recycle BC Draft 2022 Packaging and Paper Product Extended Producer Responsibility Program Plan

Stewardship Gap for Multi-Family Collection

The Recycle BC curbside collection program provides the vast majority of RDNO residents, that live in single family residences, with a high quality three stream system. It is a good example of how industry should be taking responsibility for their regulated products.

Residents in multi-family households should have the same “accessible and free” access to recycling PPP on their premises that single family households do. However this is often not the case, despite the fact that these households purchase the same PPP materials that generate the fees that fund the Recycle BC program.

In the RDNO, there appears to be limited uptake of the Recycle BC program by multi-family residences. Multi-family management and strata councils appear to be regularly selecting non-Recycle BC service providers and are paying for recycling collection services that should already be funded by industry through EPR. These non-Recycle BC services result in an inconsistent patchwork of potentially confusing recycling programs for multi-family residents.

Recycle BC needs to identify the barriers and develop specific strategies for addressing its stewardship service gap to residents that live in multi-family residences. Four potential barriers to multi-family collection are apparent and should be considered in this Program Plan:

1. Awareness of the Recycle BC Program that should be providing reasonable and free consumer access to collection services.
2. Logistical and educational challenges to servicing and using shared multi-family containers.
3. Fees being charged by Recycle BC Contractors (i.e. bin rental fees, whereas single-family residents have no such fees).
4. The level of service provided to multi-family residents appears to be significantly lower than for single-family residents (i.e. lacking educational materials, reliability for collection)

Recycle BC should be dedicating more resources and taking more accountability for its stewardship responsibilities for the multi-family sector. Recycle BC should also be taking more accountability for its service providers and ensuring they have resources to serve this sector adequately.

It is positive to see “Additional Multi-Family Metrics” in this Program Plan. However it would be useful to have a clear Recycle BC commitment to provide metrics on a regional district level in addition to provincial. Also, there should be clear baseline goals for % of multi-family facilities served for each regional district. More data and defined goals for the multi-family sector is key to addressing service gaps in this sector.

Integrated Collection Services Criteria is Limiting

Recycle BC’s proposed Integrated Collection Service (ICS) criteria in Appendix C does not appear “to be flexible to allow for relevant and innovative solutions for all types of communities” as stated in the Program Plan. The proposed criteria does not appear to provide eligibility for depot drop-

Subject: Recycle BC Draft 2022 Packaging and Paper Product Extended Producer Responsibility Program Plan

off potential to expand the program and increase collection rates in the in the RDNO communities of Cherryville and Enderby, their surrounding Electoral Areas as well as the resort communities of Silver Star and Kingfisher.

Permitting the establishment of satellite depots, that do not meet the eligibility criteria in Appendix C of the Program Plan, is an inadequate solution. This process transfers the costs of collection and transport of these materials from industry to local governments. This is the exact opposite of what should be happening in full EPR. Producers must be financially and operationally responsible for the full costs of collection, transportation and processing of residential PPP recycling in a reasonably accessible manner for all BC residents.

The criteria for Integrated Collection Services should provide some flexibility for fostering more innovative collection initiatives in areas where residents do not receive convenient access to Recycle BC services. It was encouraging to see Recycle BC's rollout of pop-up depots in 2022. It would be great to find out more about the outcomes of the pop-up depots and identify opportunities for developing this concept or alternatives to further it. Perhaps regularly scheduled seasonal events like these could be a consideration to allow residents to adapt and get more used to utilizing these options.

There are likely opportunities to explore more partnerships with retailers as collection partners. Since retailers are often the acquisition point for PPP, it is logical to think they should also be a collection point and be adequately compensated and setup to do so in a clean and organized manner. Adequate compensation that truly incentivizes retailers to participate in the Recycle BC program could also help support more recycling and the economic viability of businesses that sell products with PPP in areas with low population densities that may not have a depot.

Financial Incentives Need to Ensure Stability and Promote Program Visibility

To ensure a stable and robust depot and collection network, financial incentives should, at a bare minimum, adequately ensure that there are local organizations that are "willing and able to provide collection services that meet all program requirements and collection standards". The adequacy of these incentives provided by Recycle BC is highly questionable. Staff from local governments that operate Recycle BC collections often comment that incentives often fall very short of expenses incurred to operate the program. Also, there have been cases where private depots have stopped accepting certain Recycle BC materials or have completely pulled out of the Recycle BC Program. If there were adequate incentives it would provide more of a business case for organizations to operate these programs and would reduce the risk of depots pulling out of the Recycle BC collection system. These concerns suggest that Recycle BC Financial Incentive Methodology should be reevaluated.

Recycle BC's has opportunity to show a more dedicated commitment to the circular economy. Financial incentives should create a competitive market for the collection and management of PPP materials wherever they are generated (i.e. grocers, restaurants, movie houses, festivals, streetscapes etc.). Incentives should be encouraging competition among qualified haulers to efficiently collect residential PPP from all potential sources. A competitive market for Recycle BC products would truly shift responsibility from local governments to industry.

Subject: Recycle BC Draft 2022 Packaging and Paper Product Extended Producer Responsibility Program Plan

A Need to Address Higher Levels of the Pollution Prevention Hierarchy

A 2022 Waste Composition Study at Great Vernon Diversion & Disposal Facility found that Recycle BC materials made up the majority of EPR materials in the waste stream. According to the study data, an estimated 1,945.5 tonnes of Recycle BC Packaging and Paper Products are landfilled at this single location in a year. This makes up over 6.4% of all landfilled waste at this site.

The Program Plan mentions that Recycle BC seeks to innovate by finding new ways to encourage source reduction and reuse. However there appears to be more opportunities for this innovation to support higher levels of the Pollution Prevention Hierarchy.

Recycle BC suggests that its producer fees encourage the elimination or reduction of packaging materials. Considering the ubiquitous nature of packaging materials in the marketplace and waste stream, there appears to be more opportunity to further incentivize reduction with higher producer fees. As mentioned in the previous section, higher financial incentives, which could be supported by higher producer fees, could also encourage a more robust and competitive recycling market and contribute circular economy development.

Recycle BC has the opportunity to encourage more reuse with its members. This again could be potentially supplemented by higher producer fees that go support reuse initiatives. Perhaps Recycle BC could help support and enable initiatives that shift away from single-use items such as reusable cup and bag initiatives. Recycle BC could also look at funding innovative reduce and reuse solutions by offering a related grant program to its members and funding potential research. A funding model that supports reduce and reuse and discourages the amount of materials that are required to be managed would adhere more strongly to the Pollution Prevention Hierarchy.

Thank you for the opportunity to provide feedback to the Recycle BC Program Plan. A PPP Program that works to serve all BC residents will make recycling more intuitive for residents and would support the increase of much needed higher recovery rates for plastic. Incentives that are sufficient to support a competitive market for PPP collection would help ensure a more stable depot collection network and help contribute to circular economy initiatives that prevent excess PPP consumption and waste. Stewardship organizations and their members need to take full responsibility for their materials and not have these costs allocated to local governments and residents.

Sincerely,



Darren Murray, P.Ag.
Environmental Coordinator, RDNO Community Services

DM/DB

cc: ExtendedProducerResponsibility@gov.bc.ca



Box 219, 1350 Aster Street
Pemberton, BC V0N 2L0
P. 604-894-6371 TF. 800-298-7753
F. 604-894-6526
info@slrd.bc.ca www.slrd.bc.ca

December 22, 2022

BY EMAIL ONLY: consultation@recyclebc.ca

Recycle BC
405-221 West Esplanade
North Vancouver, BC V7M 3J3

Dear Recycle BC,

Re: Recycle BC-Packaging and Paper Product Extended Producer Responsibility Plan Update

Thank you for the opportunity to provide feedback on the Packaging and Printed Paper Extended Producer Responsibility Plan – Consultation Draft, September 29, 2022 document (Draft Program Plan).

Background

The Squamish-Lillooet Regional District (SLRD) consists of four member municipalities and four unincorporated rural Electoral Areas. The SLRD services an area of 16,354 km² with a population of 50,946 residents (census 2021).

The SLRD has been part of the Recycle BC program since 2013 and provides Recycle BC programs as follows:

- curbside collection for Britannia Beach (164 households) and Furry Creek (138 households);
- 2 principal depots (Lillooet Landfill & Recycling Centre and Pemberton Transfer Station); and
- 2 Recycle BC satellite depots (Devine Transfer Station and Gold Bridge Transfer Station).

While participating in the Recycle BC program provides numerous advantages to communities, the SLRD heavily subsidizes Recycle BC education, outreach and program operations including recycling services for the satellite depots.

Comments on the Draft Program Plan

Collection

Curbside Collection

Curbside services should be available to all communities receiving curbside garbage collection services.

Multifamily Collection

Proposed Plan:

“Recycle BC delivers multi-family building collection services by contracting with local governments, First Nations and private companies that accept an established financial incentive to deliver multi-family building collection services. In some cases, households that would generally meet the definition for curbside collection receive multi-family collection (and vice versa) due to a range of unique operational variables.”

Comments:

- Communication and onboarding should be done directly with the building owner or strata, not only through local governments and private companies.
- Recycle BC should be responsible for providing the service whether or not curbside is offered in the community.
- We support the reporting metrics outlined in the report (appendix E) and suggest the addition of “Number of multi-family households served per regional district” as this would add a layer of transparency to the data.

Integrated Recycle BC Collection Services

Proposed Plan:

“Recycle BC will honour existing depot agreements with collectors that provide collection services in communities that do not meet the eligibility criteria outlined in Appendix C but may not take steps to replace this service if the current collection partner decides to no longer provide this service.”

Recycle BC will also permit local governments to establish and operate satellite depots in communities that do not meet the eligibility criteria outlined in Appendix C, subject to Recycle BC review and approval. A satellite depot is an approved depot operating to specific standards, from which the collector (depot operator) transports the PPP to their principal depot for pick-up by the designated post-collection service provider.”

Comments:

The proposed “New Community Eligibility Criteria for Integrated Recycle BC Collection Services” puts a significant number of Recycle BC depots operated by local governments across the province at risk of losing Recycle BC support and funding once existing agreements expire, including two Squamish-Lillooet Regional District Satellite depots (Electoral Area A and C).

Comments on Appendix C:

Small communities:

- The minimum population of 1,000 permanent residents within 30 minutes will exclude many rural communities who do not have access to services and it does not account for seasonal fluctuations into areas as a result of tourism.
- The “more than 40 km from an incorporated municipality” would significantly decrease service accessibility.
- Utilizing population statistics to determine service level provision may not be a representative way of determining depot viability as they do not account for the high volumes of visitors and non-permanent residents the area sees annually.
- The permanent grocery store requirement would be a barrier to many rural communities.

If the SLRD was to lose the Recycle BC recognition and the funding for its two satellite depots, rural access to services would significantly decrease.

Mobile Depots

Proposed Plan:

“Collection also occurs at participating retail locations. Recycle BC has also piloted the operation of “mobile depots” that accept PPP at a designated location and date that is advertised to local residents, the collection of materials at community events, and the collection of all accepted PPP categories (including Plastic Bags and Overwrap, Other Flexible Plastic Packaging and Foam Packaging) through curbside collection.”

Comments:

The mobile depots are a great outreach and education initiative but should not be considered as an alternative to permanent depots.

First Nations

Recycle BC should support joint collaborations between local governments and First Nations where First Nations are adjacent to a local government operated depot. Bulk drop offs are not an adequate solution as not all communities have the space or resources to collection, storage and transport of the PPP to a depot. This adjacency is acknowledged in the plan but lacks supportive actions.

Proposed Plan:

“In addition, many First Nations communities are located near depots serviced by other local governments and private companies.”

Comments:

If financial support is not an option Recycle BC should consider allowing these depots to accept the material in the manner that makes the most operational sense to the depot handling the material and the First Nation community.

Communications

Proposed Plan:

“The Recycling Regulation requires that, as part of the Program Plan, Recycle BC design and deliver an effective resident education program that achieves two primary objectives:

- Increase resident awareness of the program features and benefits through communication activities; and*
- Engage and encourage residents to make informed and correct decisions concerning the preparation and management of PPP for collection and recycling by employment of general and targeted promotion and education (P&E) activities.”*

Comments:

An ever-increasing responsibility is being offloaded onto local governments through the creation of Contamination Remediation Plans. Local governments are being tasked with lowering contamination rates in their communities through extensive communications plans. The required actions are costly in resources, third party contracts and staff time. Recycle BC should be responsible for delivering these plans and performing the actions at their cost or providing grant programs to local governments for the actions they are taking to educate residents and lower Recycle BC program contamination.

Community Clean-Ups

Recycle BC should provide funding to support ongoing community clean-ups as much of the litter is PPP.

Financial Incentive Methodology

The program must have a plan to provide services to all communities in BC who request it, including First Nation and rural communities.

The program must provide service and adequate compensation to all multi-family buildings.

Taxpayers continue to subsidize a program that should be funded by consumers and producers, the proposed plan changes would exacerbate this as rural communities who do not meet the eligibility criteria would continue to pay into the program. Recycle BC should provide funding to support satellite depots.

The program needs to show that all collection sites are being adequately compensated for their services and in particular the local and First Nation governments.

Accepted Materials

The addition of designated single-use and packaging-like products is fully supported as these plastic products are problematic and most consumers assume they are accepted by the program. Appropriate collection and management of these items is essential for the protection of the environment and public trust in the EPR program.

The program should consider working with the Ministry to include books as they are a paper product and residents assume they are accepted as magazines. This addition would benefit the environment as well as reduce contamination rates.

The SLRD would like to see Recycle BC use its accumulated knowledge, stakeholders and plastic end-markets network working with the MoECCS in developing a durable plastic program. Durable plastic materials drive contamination rates as residents do not understand why one plastic item can be recycled while others cannot. The whole of BC's recycling program would benefit from such a collaboration.

Collaboration with Local Government

Collaboration with local governments could use some strengthening, especially when requested timelines and staff capacity are pre-determined by Recycle BC. Collaboration between Recycle BC and local government is imperative to the success of the program, higher diversion rates and lower contamination. Thank you for the opportunity to provide feedback on the proposed plan. We look forward to the continued improvement of this program.

Yours Truly,

SQUAMISH-LILLOOET REGIONAL DISTRICT

Marie-Lou Leblanc
Resource Recovery Coordinator

Vanessa Lafontaine
Communications & Projects Coordinator

CC Angela Belsham, Environmental Services Director (via email only)
Ministry of Environment and Climate Change (Email: extendedproducerresponsibility@gov.bc.ca)



THOMPSON-NICOLA

REGIONAL DISTRICT

The Region of BC's Best

300-465 Victoria Street
Kamloops, BC V2C 2A9

Tel: 250-377-8673

Toll Free in BC: 1-877-377-8673

Email: admin@tnrd.ca

Department: Solid Waste & Recycling

Recycle BC
405-221 West Esplanade
North Vancouver, BC
Sent by Email: consultation@recyclebc.ca

Dear Recycle BC,

Subject: Comments on Recycle BC's Packaging and Printed Paper Extended Producer Responsibility Plan – Consultation Draft, September 29, 2022

The Thompson-Nicola Regional District (TNRD) is thankful for the opportunity to give feedback on the Packaging and Printed Paper Extended Producer Responsibility Plan – Consultation Draft, September 29, 2022 document (Draft Program Plan). It is understood comments are to be received by December 31, 2022.

Background

The Thompson-Nicola Regional District encompasses 44,449 square kilometers in the southern interior of British Columbia. The region has 11 municipalities and 10 electoral areas with the TNRD playing a key role in providing over 120 services to residents through region-wide delivery models including recycling and solid waste. The TNRD's total population as per the 2021 Census Canada data is 143,680 (those living in a municipality and electoral area).

The TNRD operates 27 solid waste facilities that are also registered Recycle BC depots since 2018. 11 solid waste sites are principle depots where Recycle BC fully funds the transportation and processing costs of the materials collected at the depot. 17 solid waste sites are registered Recycle BC satellite depots where the TNRD funds the transportation of the materials collected on site to a principal depot or a material recovery facility, and Recycle BC funds the processing fees. The TNRD receives a financial incentive from Recycle BC based on a per tonne rate to offset operational costs of the depots. While the incentive does assist in covering the costs of operating the depots it does not fully cover operating costs or investment in infrastructure to run the program.

Key Points and Comments

1. Definition of Packaging and Printer Paper and Impacts of the Ministry of Environment and Climate Change Strategy (MOECCS) 2020 amendments to the *Recycling Regulation*.

Beginning January 1, 2023 additional materials including designated single-use products and designated packaging-like products will be included in the definition of packaging and printed paper products.

Comments:

The TNRD welcomes and supports the addition of single-use products and packaging-like products to the Recycling Regulation and Recycle BC program. These items are problematic for site attendants to keep out of the current system and their recycling will conserve landfill space and reduce negative environmental impacts. Providing close and convenient Recycle BC depot

MUNICIPALITIES: Ashcroft | Barriere | Cache Creek | Chase | Clearwater | Clinton
Kamloops | Logan Lake | Lytton | Merritt | Sun Peaks

ELECTORAL AREAS: "A" "B" "E" "I" "J" "L" "M" "N" "O" "P"

access to all TNRD residents and visitors is fundamental to ensuring these materials are properly collected for recycling.

2. New community eligibility criteria for Integrated Recycle BC Collection Services are being proposed, which apply to both new and existing depots.

Excerpts from the Draft Program Plan:

“At present, depot collection service (whether combined with curbside and multi-family collection or as a stand-alone service) is the primary method through which Recycle BC provides Integrated Recycle BC Collection Services.”

“Recycle BC will honour existing depot agreements with collectors that provide collection services in communities that do not meet the eligibility criteria outlined in Appendix C but may not take steps to replace this service if the current collection partner decides to no longer provide this service.”

“Recycle BC will also permit local governments to establish and operate satellite depots in communities that do not meet the eligibility criteria outlined in Appendix C, subject to Recycle BC review and approval. A satellite depot is an approved depot operating to specific standards, from which the collector (depot operator) transports the PPP to their principal depot for pick-up by the designated post-collection service provider.”

Comments:

The TNRD has serious concerns over the proposed community eligibility criteria. If enacted and existing agreements were not renewed at expiry, 4 existing depots in the network may not be approved as principle depots as shown in Table 1. If the TNRD sought to continue providing the existing service and Recycle BC approved the depots as satellite depots it would cost TNRD taxpayers \$42,000 minimally per year to transport the materials to the closest principal depot or material recovery facility. This high level costing estimate was calculated using 2021 tonnage/bags from each depot and applying current per bag hauling rates. This estimate does not include costs related to offsetting GHG emissions, minimum service charges and escalating fuel surcharges. Lastly, consumers would be responsible for paying both on the front end, when they purchase the product, and on the back end for the recycling of the materials through taxation. This is clearly at odds with the provincial mandate to have stewards pay 100% of the costs for the collection and recycling of their stewardship materials.

While the use of population statistics to determine service level appears to be a straightforward methodology it does not take into account non-resident transient workers, seasonal residents or tourists in a given community. These temporary community visitors purchase PPP at local grocery stores or convenience stores and should be provided an equal opportunity for recycling. In addition the TNRD has found community dynamics vary widely depending on seasonal populations and have adjusted solid waste facility hours of operation based on seasonal customer counts, solid waste tonnage, and community survey results. Assuming a depot 40 kilometers away will have the same levels of service required by the community potentially losing a depot in our experience is incorrect. It is recommended annual collection quantities be taken into account in determining depot eligibility. Annual quantities of depot collected PPP are shown in Table 1 showing significant amounts of PPP are accepted at locations that would not meet the new criteria according to the population and distance statistics used by Recycle BC.

Table 1. Proposed Eligibility Criteria for TNRD Operated Depots

Depot Location	Location	Meets Criteria	2021 PPP Kilograms
Heffley Creek Eco-Depot	Heffley Creek	Yes	124,189
Lower Nicola Eco-Depot	Lower Nicola	Yes	108,452
Clearwater Eco-Depot	Clearwater	Yes	103,290
South Thompson Eco-Depot	Pritchard	No	87,362
Boston Flats Eco-Depot	Cache Creek	Yes	78,100
Louis Creek Eco-Depot	Louis Creek	Yes	74,350
Sun Peaks Transfer Station	Sun Peaks	No	60,496
Clinton Eco-Depot	Clinton	Yes	26,337
70 Mile House Eco-Depot	70 Mile House	No	24,875
Logan Lake Eco-Depot	Logan Lake	Yes	23,437
Lytton Eco-Depot	Lytton	No	17,033
North Shuswap Bottle Depot	Chase	Yes	N/A

3. Financial Incentive Methodology

Excerpts from the Draft Program Plan:

“Costs associated with collection in communities that do not meet the eligibility criteria outlined in Appendix C, including the operation of applicable depots and satellite depots, will be excluded from collection cost studies.”

“Once new collection service agreements have been published inclusive of the revised financial incentives, each applicable collector must then decide whether to renew its collection service agreement with Recycle BC.”

Comments:

Excluding costs associated with depots that do not meet the eligibility criteria outlined in Appendix C from collection cost studies could negatively impact financial incentives offered for new collection service agreements. While it's appreciated Recycle BC has stated it intends to renew existing service agreements that do not meet the eligibility criteria, language in the Draft Program Plan could allow Recycle BC to offer incentive rates that are significantly lower than would be acceptable to existing depots. This would further shift the costs of recycling from the stewardship program onto taxpayers for local governments should they chose to continue operating depots as satellite depots.

4. Performance Targets

Comments:

We appreciate that Recycle BC has been transparent in identifying the historical method for calculating recovery rate and the inclusion of collected non-program materials (garbage) in this analysis. Looking at the program recovery rates presented in Appendix D of the Draft Program Plan, it appears that garbage (non-PPP) has been utilized in the past which inflates the recovery rate achieved for program materials. If garbage is removed from the calculation, Recycle BC did not meet the required 75% recovery rate for the years 2016-2019, as is legislated in the BC Recycling Regulation. While we appreciate that moving forward is potentially more important than focussing on the past, this accounting practice should be clearly addressed by the Ministry of Environment and Climate Change, to ensure that all Stewardship programs have a clear and equal understanding of how recovery rates are calculated and that all expectations are met. From a public perspective, the inclusion of non-product materials to artificially inflate recovery numbers creates a lack of trust in the system. The TNRD supports the transition to utilizing an “Aligned Recovery Rate methodology”.

Recycle BC proposed recovery rates are bleak for the “hard to manage and collect” materials such as Styrofoam and flexible plastics. Furthermore, the majority of these types of materials cannot be effectively collected at curbside; as such, an extensive and comprehensive depot network is required to minimize the environmental impacts of mismanagement of this product. In looking at the performance targets set, it appears that Recycle BC is setting the highest target rates for those products that are the easiest to collect (curbside) and have the greatest and most consistent market value. While it is appreciated that the market value of the products collected does have financial influence on program funding, more focus and effort (in the commitment to higher targets) should be put toward the collection of plastic film and Styrofoam products that have the greatest environmental impact when not managed properly. Given all the controversy and concerns surrounding plastic pollution, a proposed target of 25% by 2027 for Flexible Plastic would be viewed by many as sub-standard at best, especially since the previous target was 27% by 2023. Please confirm that the material category performance targets will be calculated similarly to the program recovery target in that collected “garbage” will not be utilized to arbitrarily inflate the recovery numbers.

5. General Comments

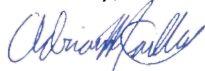
- The addition of single-use packaging and packaging-like products will increase the amount of materials generated by residents to be recycled. This is viewed as a positive; however, the accessibility outlined in the Draft Program Plan is far from adequate to provide reasonable access to recycling services.
- It is unacceptable for Recycle BC to reduce the depot collection network that already exists. The goal of continuous improvement should not to be for Stewards to transition program costs back to the taxpayer.
- In various areas of the document, the language “reduce green house gas emissions” is utilized, but with no supporting evidence or examples of how this is to be achieved. It is suggested that greater clarity be provided around this, as one could interpret the potential closure of depots or transition of transportation requirements to local governments as one methodology being utilized. It would be more acceptable to have language such as “encouraging the use of electric or RNG vehicles for transportation as much as possible”.

- Overall, the Draft Program Plan as currently worded does not meet the Program Delivery Principle of “enhance resident service levels”.

It should be noted that a separate letter has been approved for submittal to The Honorable Minister George Heyman, Minister of Environment and Climate Change Strategy expressing opposition to Recycle BC’s Draft Program Plan proposed community eligibility criteria by the TNRD Board of Directors.

Thank you for the opportunity to provide comments and the TNRD looks forward to reviewing future versions of the Draft Program Plan wherein changes are made to adequately address the concerns identified in this letter.

Sincerely,



Adriana Mailloux
Manager of Solid Waste & Recycling

cc Jamie Vieira, General Manager of Operations
 Martin Dickson, Environmental Services Coordinator

January 4, 2023

Recycle BC
405-221 West Esplanade
North Vancouver, BC

consultation@recyclebc.ca
ExtendedProducerResponsibility@gov.bc.ca

RE: Packaging and Paper Product Extended Producer Responsibility Plan – Consultation Draft

Dear Recycle BC,

Thank you for the opportunity to provide comments on Recycle BC's most recent draft Packaging and Paper Product Extended Producer Responsibility Plan. While the FVRD does not have any direct contracts with Recycle BC, five of the region's six municipalities have curbside contracts with Recycle BC, in addition to several depots under the program. None of the eight Electoral Areas are serviced by Recycle BC, but residents in these communities are affected by the proposed changes. Comments from Fraser Valley Regional District (FVRD) staff are as follows:

Comments:

- Residents of BC continually struggle with recycling. Recycle BC needs to lead the way in helping everyone in BC understand what materials are recyclable and what is actually recycled. How and why are two words that need far more explanation in the revised program plan. For example, start by simply providing data on how much plastic is collected and how much is recycled. Many residents do not have trust in the recycling system – staff frequently receive comments like “it all gets thrown into the garbage anyway”. If this is how the public perceives recycling, volumes are not going to increase.
- The program should assume the full financial responsibility for delivering the services of the program in each area including capital equipment and education. Most, if not all local governments in the program end up paying over half the cost of recycling services.
- Despite numerous attempts over several years, Recycle BC has continually denied the acceptance of FVRD rural transfer stations into the depot collection program. The most recent denial was due to a “lack of producers financially contributing to the program”. This is confusing, as we had thought the purpose of EPR programs is for producers to fund the recycling of their products. The proposed criteria should be re-evaluated to include rural community depots, so that all BC residents have equal access to recycling services. This new criteria outlines a minimum population size of 1,000 permanent residents within the service catchment area and being further than a 40 km drive from a municipality with a minimum population size of 10,000 permanent residents, as

well as having a permanent grocery store. These are limiting factors which would result in the FVRD's 4 transfer stations never being accepted into the program. In our opinion,

- It is not reasonable to expect someone to travel up to 40km to access recycling services,
- A permanent grocery store should not determine eligibility for depot service.

Staff have also received the following comments from member municipalities:

- Include private retirement residences and care facilities into the "residential" PPP collected by Recycle BC.
- Move "not accepted PPP" from contamination category to "incompatible material" category so it does not count towards a service level failure credit score.
- Re-evaluate the impact of inflation on collector costs. Program incentives should cover at least the average collection costs. Incentivize collectors to move towards multi-stream collection models to reduce the impact of contamination in single stream collection.
- Collaborate with municipal communications departments on campaigns to reduce contamination and increase participation.
- Contribute to the cost of waste composition studies conducted by local governments as part of Recycle BC program assessments.
- Simplify the process and reduce the timeline required for transitioning curbside services from local government to Recycle BC.

Thank you for taking the time to review our feedback. Please contact me at [REDACTED] to discuss further, or if more clarification is required.

Sincerely,

Carolynn Lane

Carolynn Lane

Environmental Services Coordinator

To whom it may concern,

The Resort Municipality of Whistler (RMOW) appreciates the opportunity to share feedback on the draft 'Packaging and Paper Product Extended Producer Responsibility Plan.'

The RMOW is committed to a zero waste future and believes that achieving zero waste is key in responding to climate change. Our current resource consumption systems create waste and generate a huge amount of greenhouse gases which threaten the environment and human health. EPR programs can play a crucial role in changing these consumption systems.

We recognize that BC is a global leader in EPR programs, and that the Province, through the *Recycling Regulation*, has supported their growth and development. Since their inception, the EPR programs have evolved, they are utilized extensively within our community, and they are integrated into waste diversion programs/systems throughout British Columbia. That said, the Province must ensure these programs are continually moving the dial to ensure they move beyond business as usual, which includes the following actions (but isn't limited to these) and the related targets (or the development of):

- Increase their support of the top tiers of the pollution prevention hierarchy, such as reduction and reuse;
- Support improvements to packaging design;
- Increase collection rates;
- Increase accessibility; and,
- Increase customer and industry awareness of all accepted products.

Please see our comments by section below:

Section 2 - EPR agency

2.2 Administration

The RMOW commends Recycle BC for establishing a provincial advisory committee to provide ongoing engagement and hear non-steward perspectives. The RMOW would like to see this group have transparency with their recommendations, and details of the committee, including minutes, should be provided on the Recycle BC website.

In addition to this, the Recycle BC Board would ideally represent a broader range of stakeholders, including reuse and repair organizations, recyclers, local governments, First Nations, and environmental NGOs.

2.4 Program Financing

The RMOW would like to see the program fund education and incentives for producers to offer refill and reuse systems and to decrease their packaging. Fees should reflect management costs but also be calculated to reflect environmental costs to drive a decrease in plastic packaging (particularly foam



packaging and multi-material flexible packaging) and the use of more local, circular systems. Sufficient fees should be collected to pay the actual costs borne by collection partners and to build a reserve fund to prepare for the expected increase in severe weather and other events.

The program needs to prove that all collection sites are being adequately compensated for their services and in particular, that local and First Nation governments do not end up subsidizing the program (including for education services).

Section 3. Packaging and Paper Product

We are pleased that the program covers all products defined in the *Recycling Regulation* but hope for completeness that the program will work with the Ministry of Environment & Climate Change Strategy (the Ministry) to include books. The inclusion of the single-use products and packaging-like products is a significant step forward.

The program should work with the Ministry to reconsider the exemption for time share and condominium residences that may be both part time residence and a vacation facility. Within one building, there may be owners who use their unit exclusively themselves and others who choose to rent them out. There is no difference in the types of packaging used in these units and it is no different to the numerous single family homes that are rented out as short-term rentals but that do receive service.

An exposure risk assessment on plastics and printing inks related with packaging and paper products must be completed prior to materials being allowed for use within the province. This will mitigate toxicity and environmental hazard associated with material use.

Section 4. Program Design

4.2 Program Delivery Overview

The program should offer full compensation for costs incurred to provide the services rather than just an incentive.

In regards to financing, Recycle BC should further develop variable environmental handling fees based on certain criteria such as lifespan, use of refillables and reusable containers and use of easy to recycle materials (versus materials that are wasted by being burned for energy). This change will ideally drive product design change.

The program should also disincentive biodegradable forms of packaging from being used with prohibitive fees for its use.

The fees should be set at a higher level to pay for the improvements needed in understanding collection rates, providing more comprehensive collection networks, enhancing awareness and fulfilling the mandate for redesign and reuse.



4.3 Collection

4.3.2 Accepted Materials

The RMOW agrees that the program should charge fees for materials that are put into the marketplace but are not collected, however, these fees should then go to local governments who end up with the responsibility of managing those materials. Fees for unaccepted materials should be high enough to drive design change. By doing this, the producers are incentivized to change design, local governments are compensated for their services and the program does not benefit from not collecting the materials (thus avoiding a perverse incentive).

The activities that Recycle BC will pursue (estimating percentage of not accepted materials and composition audits) are good steps and the results should be made public. The other steps that look to try to recycle the non-recyclable, however, will only waste time and resources. Following the principle to focus on outcomes and minimize complexity, the most suitable steps are to work to phase out the non-recyclables through producer engagement, education, eco-modulated fees and collaborations to ban problematic packaging.

Compostable PPP

We fully support compensation of local governments for their processing of the fibre-based elements but want to ensure that Recycle BC does not support the collection of any compostable plastics, nor fibre that has been treated in any way (such as coated with Perfluoroalkyl and Polyfluoroalkyl Substances (PFAS) or any other potential contaminants). In addition, Recycle BC should ensure that the materials sent to a composting facility are able to break down under the actual operating conditions of typical facilities operating in BC, and that the facility wishes to accept them. If not, Recycle BC should consider developing its own collection and processing system.

Recycle BC should work collaboratively with the Ministry of Environment and Climate Change Strategy to support Organic Matter Recycling Regulation (OMRR) amendments that establishes a specification specific to BC promoting non-toxic compostable materials.

4.3.4 Multi-Family Collection

The incentive should be reframed as full compensation for the provision of services and the full costs paid. Transparency is needed to show the percentage of multi-family buildings in BC that receive services. Communications should be direct to the building owner or strata as it is not clear if most are even aware of the obligation Recycle BC has to provide their services. The system and oversight of the collection from multi-family buildings needs significant strengthening.

4.3.7 Streetscape Collection

Recycle BC should lower the eligibility requirements for local governments to provide streetscape collection. The RMOW has a full time population less than 20,000; however, we have an adjusted population of over 30,000 due to tourism. The RMOW believes that Recycle BC should already be responsible for streetscape collection within our community.



The RMOW would also like to see Recycle BC work to decrease single-use beverage cups and incentivize reuse programs. Coffee cups are by far the number one item we see in our streetscape collection.

4.3.8 Financial Incentive Methodology

Recycle BC should pay for all of the costs that are required to provide the service and to keep the payment levels up to the increase in costs for all of the communities that wish service (including provision of bins). We agree that there should be a premium paid for multi-stream collection over single stream and penalties for contamination. The costs studies show that Recycle BC is paying below even the average costs to provide the services, let alone covering the higher costs that some communities may experience. This means that communities continue to subsidize the program or may not have suitable services. This needs to be rectified.

Waste Composition Audits

The use of waste composition audits is useful to see what PPP remains uncollected by the program. Recycle BC should advocate to Steward Agencies of British Columbia (SABC) to take a comprehensive and methodical approach to identify when and where waste composition audits are conducted. There should be more effort on behalf of EPR Program's to be involved in and help finance waste composition studies as their data provides insight into whether a product is or is not ending up in the landfill.

4.4 Post Collection

The focus on investments in mechanical recycling infrastructure, efficiency, transparency and local end markets is appreciated. Care should be taken that the work to minimize redundancy does not make it challenging for Recycle BC to secure future contracts or impact the resiliency of the network. The focus on technology should not come at the expense of innovation in the systems that result in the materials being discarded in the first place.

An additional key outcome should be to include environmental outcome by using the material at the highest level of the waste hierarchy as possible. The Zero Waste Hierarchy should be used to develop systems for the PPP to be redesigned, reduced, reused and recycled. Investments in or use of “chemical recycling” should be avoided in favour of steps further up the hierarchy. We appreciate Recycle BC’s diligence in overseeing end market destinations and processors, with a preference for Organization for Economic Co-operation and Development (OECD) countries and processors that meet standards. This is essential to operating a quality program and building trust in the BC system.

4.5 Dispute Resolution

The concern with the dispute resolution process is the inherent imbalance of power between Recycle BC and what could be a fairly small collector or even an individual local or First Nation government. Current contracts are take-it or leave-it for rates that Recycle BC acknowledges will not even pay for the average of costs incurred. With the advent of the program, there is even less ability for a community or collector or processor to go it alone and market the small amount of materials an individual community may collect. Meanwhile, Recycle BC has been failing to meet its mandate to provide service to all of BC and paying



100% of the costs. In this context recognizing these imbalances, there needs to be far greater options available to collectors, processors and most importantly communities (including First Nation communities) to access a fair dispute resolution process (possibly including coverage of all costs of mediation or arbitration).

4.6 Communications

The communications program should not only work to increase awareness and make correct decisions on collection and recycling through its existing strategies, but also aim to change behaviour and offer options to reduce the amount of PPP used in the first place.

Recycle BC should determine if it is most effective to try to raise collection rates of poorly performing materials (i.e. low collection rates, low awareness levels, low marketability of materials such as flexible plastics, foam and film plastics) or if it's better to try to phase their uses out through strong program incentives switching to reusables or other materials that have a strong and steady recycling market.

Over time, for materials that can be recycled and for which RecycleBC can collect, it should work with producers to ensure the recycling labels in packaging is accurate with regard to recycling claims.

The program may also wish to do user surveys to understand where and why materials may be uncollected, including looking at awareness, accessibility, convenience and other barriers that may exist to collection. A target to raise awareness as well as an annual survey to measure it would be useful to better understand barriers that the program should address.

A survey of the collection network should be done to understand what areas could be improved from both a collector and customer perspective. This network is an asset and using the collective knowledge would be advantageous. Metrics on customer satisfaction and collector satisfaction should be added to the program with targets suitably high for such an established program. A secret shopper (or dropper) program should be implemented to understand the consumer experience and if the collection sites are welcoming of products and providing correct information.

The goal should be to get 95% of the population aware of the program by 2024 (and later 100%) with work done to increase awareness of the new range of products. To do otherwise is to continue to externalize costs to the public and the environment. The program could also support disposal bans with local governments as a way to ensure certain materials are not introduced to the community highlighting that those material use is not appropriate. More research should be done on the portion of products that are not collected to identify producers that are not participating in the program.

Recycle BC should consider the need to provide information in multiple languages based on the make-up of the communities in BC. Programs may also need to connect with different audiences if there are different kinds of products used by different markets. Consider the demographics of BC with regard to languages and ensure the materials are produced in the suite of languages needed to reach multiple demographics.



Section 5. Program Performance

5.1 Managing Environmental Impacts

We appreciate that the program is seeking to innovate and encourage reduction, reuse as well as recycling but the plan should spell out what new steps the program will take to achieve targets as noted above and engage directly with producers to do so.

We appreciate the work done by the Canadian Plastics Pact (CPP) but this program is accountable to more than the members of the CPP and more than to just plastic material (though this is the most problematic material). Most of the focus of CPP to date has been on recycling and how to include hard to recycle materials. The Golden Design Rules look at using slightly less plastic in packaging and increasing the value of the some materials (including flexible packaging) but offer no guidance on how to eliminate unnecessary packaging and foster reuse and refill instead. The program should be taking direct actions with the producers on these elements.

5.2 Pollution Prevention Hierarchy

As noted above, we encourage the program to use the Zero Waste Hierarchy and to go beyond hoping that producers are taking their own initiatives to actually driving, inspire and fund initiatives by producers. In particular, we would like to see a set of commitments and actions for how the program is going to drive the rethinking of PPP (such as eliminating plastic wrap on magazines and newspapers), eliminating harmful and hard to recycle forms, reducing environmental impacts, reducing toxicity of PPP (including inks and additives), and fostering reusables and refillables (for single use items associated with food or bags but also for delivery packaging).

5.3 Performance Targets

5.3.1 Program Recovery Rates

The program is expected to meet a 75% recovery (or more accurately collection) rate or a higher target set by the Director. Given that this recycling system and program is well established, far higher targets are suitable. The change to aligned recovery rates is suitable as is the change to exclude non-PPP that is collected. Including ICI and establishing recovery targets for both ICI and residential material within the program would be appropriate and would allow for a simpler understanding on how the province is performing. This metric could be used and shared with other provinces that are interested in developing a recycling EPR system of their own.

Further recommendations include:

- Include an estimate of the PPP introduced by small producers and add that to the denominator for a more accurate representation of the PPP introduced to BC;
- Change the recovery (collection) targets to 95% (including the addition of the small producer's material and exclusion of the non-PPP) for 2023 reaching 100% by 2027; and,



- Provide an actual recovery rate (PPP recycled [not including the portion that is not sold to market for recycling or goes to landfill or other disposal]/ total PPP introduced to BC [including from small producers]) and set a clear, ambitious target of no lower than 75%.

5.3.2 Material Category Performance Targets

It is good to measure the performance by material category but given that there is such a variation in the performance of plastic types, the program should break these categories further into each type of plastic.

When targets are achieved or not, or metrics go over 100%, there should be some explanation of what is changing in the system to influence these numbers in the annual reports.

Targets for the recovery (collection) rate should be 95% in 2023 for all materials rising to 100% by 2027 with the exception of flexible plastic and foam which should have targets to decrease their use in packaging.

As noted above, the supply of PPP from small producers should be included in calculations of results for these targets as well. There should be actual recovery rates (how much of total PPP introduced into the market was recycled) with clear, ambitious targets no lower than 75%.

5.4 Performance Metrics

We support the collection/recovery rate metrics listed, including reporting by Regional District. The RMOW would like to see the program also report by community (including contamination rates) and provide this data direct to each community.

The accessibility metrics are useful but should include a target to cover 100% of communities (including First Nation communities) with curbside or staffed drop off of waste by 2027. Other metrics should show:

- The percentage of total population with service as well as percentage of communities (but not including communities served only with irregular, infrequent mobile collection events);
- The percentage of multi-family households serviced by community; and,
- The percentage of each, of total estimated costs that Recycle BC pays for collection (by curbside, multi-family, depot and streetscape), transport and processing, as well as the total percent that Recycle BC pays for all of collection, transportation and processing.

The Consumer Awareness Target should be 95% increasing to 100% by 2027. Metrics should include surveys to understand why residents do not use available systems.

Pollution Prevention Hierarchy Targets should include 95% of collected PPP to reuse or recycling commodity markets (excluding use as engineered fuel).

GHG Emissions should have a target to decline each year through smaller loops of materials, especially with reuse. Note that too often plastic is touted as a way to save GHGs over the use of glass but refills and



reuse of glass in local loops is far preferable to plastic transported long distances. The measurement of GHGs should be for systemic emissions and not solely for direct program operations.

Costs are another important measure and should include costs saved by local governments (and their taxpayers) and from reduced environmental harms (as well as ongoing environmental harms). A measure should be presented for total costs and remaining externalized costs.

Financial transparency should be a goal and Recycle BC should provide detailed financial information annually.

Section 6. Consultation

Recycle BC is to be commended for engagement with environmental groups as well as local governments, First Nations, Regional Districts and others and we hope that this raises the bar for other programs and engagement.

Institutional, Commercial and Industrial PPP

This material is not regulated yet but there is a very strong interest in having producer-funded systems to handle this material as well. Often the materials are exactly the same as the residential PPP with the same producers. There are many synergies that could be had from addressing all packaging and more opportunities that would open for redesign and reuse from an integrated comprehensive system. Small communities, in particular, that had collected recycling prior to the advent of residential PPP EPR were challenged to collect, market and transport the remaining portion which resulted in the cessation of ICI recycling in some cases. We recommend that Recycle BC examine the opportunities to bring about an integrated system and leverage its knowledge of recycling PPP in BC to be prepared to offer its services in advance of regulatory change.



Conclusion

The RMOW appreciates the opportunity to provide feedback and would like to reiterate that this is an opportunity to reduce environmental impacts.

We hope to see increasingly ambitious goals for the Recycle BC Extended Producer Responsibility Program to further awareness and collection to ensure the program's continued growth. Sincerely,

A handwritten signature in purple ink, appearing to read "Andrew Tucker".

Andrew Tucker
Manager of Transportation and Waste Management

A handwritten signature in black ink, appearing to read "Lauren Harrison".

Lauren Harrison
Solid Waste Technician



THE CORPORATION OF
THE VILLAGE OF FRUITVALE
In the "HEART OF THE BEAVER VALLEY"

OFFICE OF THE MAYOR

December 21, 2022

**Recycle BC
405-221 West Esplanade
North Vancouver BC**

Sent by Email: consultation@recyclebc.ca

Dear Recycle BC,

**Re: Comments on Recycle BC Packaging and Printed Paper Extended
Producer Responsibility Plan – Consultation Draft, September 29, 2022**

On behalf of the Village of Fruitvale, I would like to take the opportunity to provide feedback on the Packaging and Printed Paper Extended Producer Responsibility Plan – Consultation Draft, September 29, 2022 document (Draft Program Plan) in support of the Regional District Kootenay Boundary (RDKB).

Background

The Village of Fruitvale has their recycling picked up by services provided by the RDKB who operates four Recycle BC depots for the collection of residential recycling at the McKelvey Creek Landfill (Trail), Christina Lake Transfer Station, West Boundary Landfill (Greenwood) and Rock Creek Transfer Station. A private depot is located in Grand Forks.

The RDKB also operates a depot at the Beaverdell Transfer Station, which collects packaging and printed paper materials from residential sources. Even though for many years we have requested that this depot be included in our agreement, it is not funded by Recycle BC.

Under your EPR program, Recycle BC is responsible for costs associated with collection, transportation, processing, etc. The RDKB is paid a financial incentive based on a per tonnage rate, to offset operational costs at the collection depot. However, the incentive is not sufficient to cover actual depot costs.

Key Points and Associated Comments Identified in the Draft Program Plan:

1. Definition of Packaging and Printed Paper and Impacts of the 2020 amendments to BC Recycling Regulation

- Beginning January 1, 2023, additional materials, including designated single-use products and designated packaging-like products, will be included in the definition of packaging and printed paper products.
- Comments:
 - The definition of Packaging and Printed Paper encompasses a varied and significant product list for which materials are regularly and frequently purchased by residential customers and require frequent and ongoing access to recycling options.
 - The collection of the most challenging products and those with the most significant and harmful impacts to the environment are completed primarily through the use of depot collection.
 - The addition of these products to the BC Recycling Regulation is fully supported, and it is appreciated that Recycle BC is taking on the collection of these products.
 - It is essential to maintain and or even expand the depot collection network to ensure that these problematic plastic products are collected appropriately for recycling.

2. New community eligibility criteria for Integrated Recycle BC Collection Services are being proposed, which apply to both new and existing depots.

- Taken directly from the Draft Program Plan:
 - "At present, depot collection service (whether combined with curbside and multi-family collection or as a stand-alone service) is the primary method through which Recycle BC provides Integrated Recycle BC Collection Services."
 - "Recycle BC will honour existing depot agreements with collectors that provide collection services in communities that do not meet the eligibility criteria outlined in Appendix C but may not take steps to replace this service if the current collection partner decides to no longer provide this service."
 - "Recycle BC will also permit local governments to establish and operate satellite depots in communities that do not meet the eligibility criteria outlined in Appendix C, subject to Recycle BC review and approval. A satellite depot is an approved depot operating to specific standards, from which the collector (depot operator) transports the PPP to their principal depot for pick-up by the designated post-collection service provider."
- Comments:
 - As a result of the new criteria, a significant number of Recycle BC depots operated by local governments across the province are at risk of being eliminated from the program once existing agreements expire, including two in the Boundary region of the RDKB.
 - Should these depots be closed, it will create cascading impacts to surrounding depots, which may not be able to appropriately manage the additional materials. For example: increased traffic and line ups, greater volumes of materials to process, and complaints due to limited hours of operation, especially from residents who have had to travel 40km to access recycling opportunities.

- Closure of depots will also have the following unintended (or maybe intended) consequences: transfer of greenhouse gas emissions and fuel costs to residents and local governments.
- How exactly did Recycle BC determine that a 40km distance from an established depot was a reasonable distance to travel for recycling opportunities? If a resident has a grocery store (or equivalent place to purchase PPP) in their community, should they not be provided an equal opportunity for recycling?
- Utilizing population statistics in determining service level provision may not be a representative way of determining depot viability. We would like to see a breakdown of all the depots across BC and the tonnages that have historically been diverted through these depots.

3. Financial Incentive Methodology

- Taken directly from the Draft Program Plan:
 - "Costs associated with collection in communities that do not meet the eligibility criteria outlined in Appendix C, including the operation of applicable depots and satellite depots, will be excluded from collection cost studies."
 - "Once new collection service agreements have been published inclusive of the revised financial incentives, each applicable collector must then decide whether to renew its collection service agreement with Recycle BC."
- Comments:
 - It could be argued that the collection costs for existing depots that do not meet the eligibility criteria in Appendix C are higher than depots that would meet the criteria. Assuming costs are presented on a \$/tonne basis, and considering fixed costs of depot operation, those depots that collect lower tonnages would have higher operational costs. These costs will no longer be considered in collection cost studies.
 - Although Recycle BC has indicated an intent to honor existing depot agreements for those depots that do not meet the eligibility criteria, the language in the current Draft Program Plan would potentially allow Recycle BC to offer incentive rates that are significantly lower than would be acceptable to existing depots.
 - Once a depot has been established in a community it is almost impossible to remove that service without significant impact to residents. A local government would be placed in the position of having to accept the incentive rates from Recycle BC and ultimately pay a greater portion of the depot operating costs.
 - Should a private depot choose to not accept the incentives offered by Recycle BC, this would result in the local government having to step in to establish a satellite depot, wherein even more costs (capital, operations, transportation) are paid for by the general taxpayer. In addition, the local government would also be obligated to track and report on the resulting green house gas emissions.
 - The Recycle BC Program is already not a full producer-pay program and in essence, Recycle BC is setting up the ability to further transition costs to the taxpayer for the collection and recycling of packaging and printed paper. This is in direct conflict with the basic principle behind the BC Recycling Regulation.

4. Performance Targets

- Comments:
 - We appreciate that Recycle BC has been transparent in identifying the historical method for calculating recovery rate and the inclusion of collected non-program materials (garbage) in this analysis.
 - Looking at the program recovery rates presented in Appendix D of the Draft Program Plan, it appears that garbage (non-PPP) has been utilized in the past to inflate the recovery rate achieved for program materials. If garbage is removed from the calculation, Recycle BC did not meet the required 75% recovery rate for the years 2016-2019, as is legislated in the BC Recycling Regulation. While we appreciate that moving forward is potentially more important than focussing on the past, the Ministry of Environment and Climate Change should clearly address this accounting practice, to ensure that all Stewardship programs have a clear and equal understanding of how recovery rates are calculated and that all expectations are met. From a public perspective, the inclusion of non-product materials to artificially inflate recovery numbers creates a lack of trust in the system.
 - The Village of Fruitvale supports the RDKB who supports the transition to utilizing an "Aligned RR methodology".
 - Recycle BC proposed recovery rates are dismal for the "hard to manage and collect" materials such as Styrofoam and flexible plastics. Furthermore, the majority of these types of materials cannot be effectively collected at curbside; as such, an extensive and comprehensive depot network is required to minimize the environmental impacts of mismanagement of this product.
 - In looking at the performance targets set, it seems that Recycle BC is setting the highest target rates for those products that are the easiest to collect (curbside) and have the greatest and most consistent market value. While it is appreciated that the market value of the products collected does have financial influence on program funding, more focus and effort (in the commitment to higher targets) should be put toward the collection of plastic film and Styrofoam products that have the greatest environmental impact when not managed properly. Given all the controversy and concerns surrounding plastic pollution, a proposed target of 25% by 2027 for Flexible Plastic would be viewed by many as sub-standard at best, especially since the previous target was 27% by 2023.
 - Please confirm that the material category performance targets will be calculated similarly to the program recovery target in that collected "garbage" will not be utilized to arbitrarily inflate the recovery numbers.

5. General Comments

- The addition of single-use packaging and packaging-like products will increase the number of materials generated by residents to be recycled. This is viewed as a positive; however, the accessibility outlined in the Draft Program Plan is far from adequate to provide reasonable access to recycling services.
- It is unacceptable for Recycle BC to reduce the depot collection network that already exists. The goal of continuous improvement should not be for Stewards to figure out innovative ways of transitioning costs back to the taxpayer.
- In various areas of the document, the language "reduce green house gas emissions" is utilized, but with no supporting evidence or examples of how this is

to be achieved. It is suggested that greater clarity be provided around this, as one could interpret the potential closure of depots or transition of transportation requirements to local governments as one methodology being utilized. It would be more acceptable to have language such as "encouraging the use of electric or RNG vehicles for transportation as much as possible"

- Overall, the Draft Program Plan as currently worded does not meet the Program Delivery Principle of "enhance resident service levels".

Thank you for the opportunity to provide comments. The Village of Fruitvale looks forward to reviewing future versions of the Draft Program Plan wherein changes are made to adequately address the concerns identified in this letter.

Sincerely,



Catherine Ellison
Acting Mayor

cc Roly Russell, MLA—Boundary Similkameen (Email: Roly.Russell.MLA@leg.bc.ca)
Katrine Conroy, MLA—Kootenay West (Email: Katrine.Conroy.MLA@leg.bc.ca)
Ministry of Environment and Climate Change (Email: extendedproducerresponsibility@gov.bc.ca)
Prab Lashar, CAO
Steve Morissette, Mayor
Julia Mason, Councillor
Wesley Startup, Councillor
Bill Wenman, Councillor



December 21, 2022

Recycle BC Program Plan Feedback

To Whom It May Concern:

Thank you for the opportunity to comment on the draft plan. Zero Waste BC is a non-profit association dedicated to driving systemic change towards Zero Waste in BC. Zero Waste Canada is a non-profit grassroots organization and the Canadian national affiliate for the Zero Waste International Alliance dedicated to ending our age of wastefulness through improved industrial design, certification, and education. Zero Waste is the conservation of all resources by means of responsible production, consumption, reuse, and recovery of products, packaging, and materials without burning and with no discharges to land, water, or air that threaten the environment or human health. Our current resource consumption systems of linear take-make-waste not only create waste but also generate a huge amount of greenhouse gases which constitute some of the discharges that threaten the environment and human health. EPR programs can play a key role in changing these consumption systems. For more information on Zero Waste, please see the Zero Waste Hierarchy.¹

We are pleased that Recycle BC will be submitting its plan which includes some improvements to its existing system but hope for many more. We submit these comments in hope that the program will show leadership in the realm of EPR to move it beyond mere recycling to actually changing the nature of the products and how the service is delivered, as envisioned in the Canadian Council of Ministers of Environment Canada-wide Action Plan for EPR. We also hope the program will aim to address the gaps noted in the Canadian Council of Academies circular economy study commissioned by Environment and Climate Change Canada.² Furthermore, Recycle BC is encouraged to raise the bar in educating society on the overarching outcomes it wishes to achieve in the next five years towards sustainability and measuring this against the United Nations Sustainable Development Goals (SDGs). This should become a new standard for EPR in measuring across the triple bottom line of social, environment and economic outcomes that advances the circular economy. The 17 SDGs aim for a healthy social fabric and new economic business models while protecting biodiversity, the environment and the climate.

Please see our comments by section below:

¹ Zero Waste Hierarchy: <https://zerowastecanada.ca/zero-waste-hierarchy/>.

² Canadian Council of Academies, (2021), Turning Point. <https://cca-reports.ca/reports/the-circular-economy-in-canada/>

Section 1. Context

We appreciate the Recycle BC program for providing collection and recycling services for residential packaging and paper products in a way that has weathered the change in global recycling patterns and offers some transparency into where the materials go. We hope that Recycle BC will go beyond furthering its producer members' plastic recycling objectives to actively working to decrease plastic flows starting with the hard to recycle, single use and low market value plastics.

Section 2. EPR agency

2.2 Administration

We appreciate that Recycle BC has an Advisory Committee and hope that there can be more transparency for this committee by including minutes, recommendations from the committee and how the Board has addressed them on the website. In addition to this, the Board would ideally represent a wider range of stakeholders including reuse and refill organizations, recyclers, other local governments, First Nations and environmental NGOs.

2.3 Producer Members and Definition

There is a definition of "small producer" in the Recycling Regulation that exempts producers with gross revenue of under \$1,000,000 but the packaging from these producers still flows into the waste and recycling system and the exemption allows small producers to use packaging without penalty and at a cost to the other producers. Recycle BC should work with the Ministry to lower the exemption amount step-wise over time to capture more producers, collect better data and even the playing field.

2.4 Program Financing

In addition to the factors noted, the program should also be funding education and incentives for the producers to offer refill and reuse systems and to decrease their packaging. Fees should reflect management costs but also be calculated to reflect environmental costs to drive a decrease in plastic packaging (particularly foam packaging and multi-material flexible packaging) and the use of more local, circular systems. Sufficient fees should be collected to pay the actual costs borne by collection partners and to build a reserve fund to prepare for the expected increase in severe weather and other events.

The program **needs to prove** that all collection sites are being adequately compensated for their services and in particular, that local and First Nation governments do not end up subsidizing the program (including for education services).

Transparency

The program should aim for full transparency, including information on these items:

- what percentage of producers are members
- how the materials were managed according to the hierarchy (and clarify the definitions being used)
- where the materials go
- of what organizations and lobby groups it is a member
- explain the relationship and role of the Canadian Stewardship Services Alliance (CSSA)
- producer fees - how they are calculated based on material type, including how the fees are encouraging design change
- how Board members are selected and if they are paid.

Third party verification of data should be provided wherever possible and not just for the elements required by the Ministry.

Environmental, Social and Governance (ESG) elements

Corporate ESG is now emerging. Publicly traded corporations will be required to report on environmental, social and governance policies and metrics. A new reporting regime of ESG needs to be incorporated into EPR plans voluntarily while the Ministry should make plans to update the Recycling Regulation and Guidance to accommodate ESG reporting. It is important to note that this will not be new to Recycle BC Board members and some are well positioned to support this type of reporting as it would add value to other corporate members, government, indigenous communities, academia.

Federal Plastics Registry

We encourage Recycle BC to collaborate with the upcoming Federal Plastics Registry to provide suitable data as well as to seek further benefits such as developing a better understanding of the full amount of packaging going into the market.

Governance

The following elements should be incorporated to improve the governance to the highest standards:

- A good balanced governance structure should be designed from an ESG perspective and the members participating should not be spectators but decision-makers and influencers in shaping a sustainable supply chain of materials into a circular economy with a goal to create cleaner sustainable packaging. Board members should be able to influence upstream design of packaging and to address problematic packaging.
- Increase transparency in selecting board members. Election of board members should occur at the Annual General Meeting.
- Members of Recycle BC should be invited to hear the results of its performance annually.
- There should be a sub-committee to deal with problematic plastics with low recovery rates. This is an opportunity to show continuous improvement and commitment to take on challenges to plastics.
- Another sub-committee should address free-riders.

- Board members should demonstrate their understanding of good corporate governance and have taken some basic training (accredited or non-accredited.) and this should be disclosed in the annual report. As the board has a fiduciary responsibility and executes the financial operations, having trained board members becomes critical and ethically sound.

Section 3. Packaging and Paper Product

We are pleased that the program covers all products defined in the *Recycling Regulation* but hope for completeness that the program would work with the Ministry to include books. The inclusion of the single use products and packaging-like products is a significant step forward.

The program should work with the Ministry to reconsider the exemption for time share and condominium residences that may be both part time residence and a vacation facility. Within one building, there may be owners who use their unit exclusively themselves and others who choose to rent them out. There is no difference in the types of packaging used in these units and it is no different to the numerous single family homes that are rented out as short-term rentals but that do receive service. Student housing, senior housing and all forms of housing should also be included. In addition, the program needs to address the fact that businesses purchasing items from producer members will have had a fee included in the price of the product but will not have access to the program.

Section 4. Program Design

4.1 Principles

The program should add a principle that the program will strive to meet the intent of the Canadian Council of Ministers of Environment Canada-wide Action Plan for EPR.

4.2 Program Delivery Overview

The program should offer full compensation for costs incurred to provide the services rather than just an incentive.

In smaller communities where the division of recycling services into residential (Recycle BC) and ICI (local government or private sector) has created a problem in marketing the remaining materials, Recycle BC should offer a service (for a fee) to transport, process and market the materials that end up at local government (or local government-approved) facilities. This would alleviate the challenges that local governments have experienced handling the smaller volume of materials and reduce redundancy of systems and services.

In regards to financing, Recycle BC should further develop variable environmental handling fees based on certain criteria such as lifespan, use of refillables and reusable containers, use of easy to recycle materials (versus materials that are wasted by being burned for energy), etc. to drive product design change as intended by the Canadian Council of Ministers of Environment. The

program could incentivize reusable containers and then those that are actually recyclable. try to prevent biodegradable forms of packaging from being used with prohibitive fees.

The fees should also be set at a higher level to pay for the improvements needed in understanding collection rates, providing more comprehensive collection networks, enhancing awareness and fulfilling the mandate for redesign and reuse.

4.3 Collection

4.3.2 Accepted Materials

The program is correct to charge fees for materials that are put into the marketplace but not collected. However, these fees should then go to local governments who end up with the responsibility of handling them. Fees for unaccepted materials should be high enough to drive design change. By doing this, the producers are incentivized to change design, local governments are compensated for their services and the program does not benefit from not collecting the materials (thus avoiding a perverse incentive).

The activities that Recycle BC will pursue (estimating percentage of not accepted materials, and composition audits) are good steps and the results should be made public. The other steps that look to try to recycle the non-recyclable, however, will only waste time and resources. Following the principle to focus on outcomes and minimize complexity, the most suitable steps are to work to phase out the non-recyclables through producer engagement, education, eco-modulated fees and collaborations to ban problematic packaging. Facilitating claims that a material is recyclable when it is not truly recyclable such as allowing it as a contaminant in a plastic stream or hiding it in concrete will only exacerbate the public mistrust issue noted in the context (section 1).

Compostable PPP

We fully support compensation of local governments for their processing of the fibre-based elements but want to ensure that Recycle BC does not support the collection of any compostable plastics, nor fibre that has been treated in any way (such as coated with PFAS or any other potential contaminants). Recycle BC should develop stringent requirements to eliminate the use of PFAS (and other harmful chemicals) in packaging and printed paper. In addition, Recycle BC should ensure that the materials sent to a composting facility are able to break down under the actual operating conditions of the facility and that the facility wishes to accept them. If not, Recycle BC should consider developing its own collection and processing system.

4.3.3 Curbside Collection

Recycle BC has been doing well to expand its curbside collection offerings. It has been also working with First Nation communities to improve its collection infrastructure. However, the

criteria set out in Appendix B for which communities qualify for service do not meet the intention of the Recycling Regulation (which does not have these limits). Recycle BC services very small to very large communities so it has proven that the system can work in small communities. In addition, residents in small communities contribute to the producers coffers when they buy products and deserve equal access to the service. The services should be offered to any municipality, First Nation community or rural community that has or is planning to implement curbside garbage collection, regardless of size, density, if there is a grocery store or if the previous contract holder declined to renew. Once a community has signed up for the service, it should be delivered within a calendar year or to coincide with the rollout of curbside garbage service if that is being added. Recycle BC should pay for the bins. Only allow multistream collection for new services and increases.

4.3.4 Multifamily Collection

The incentive should be reframed as full compensation for the provision of services and the full costs paid. Transparency is needed to show the percentage of multifamily buildings in BC that receive services with a target to get to 100% of buildings that wish the service being serviced within 5 years. Communications should be direct to the building owner or strata as it is not clear if most are even aware of the obligation Recycle BC has to provide their services and that the Regulation would dictate that Recycle BC pay their full costs of recycling. The system and oversight of the collection from multifamily buildings needs significant strengthening. A building owner or strata should be able to opt in and then Recycle BC should be responsible for providing the service (regardless of if curbside service is offered in the community or not, or by their hauler). All areas of BC should be serviced by Recycle BC with a particular focus to quickly expand service in smaller communities where existing options for multi-family recycling do not exist.

4.3.5 Integrated Recycle BC Collection Services

Now that West Vancouver has piloted separate collection of foam and plastic and several communities have separate glass collection, Recycle BC should work to collect film plastics and glass separately through curbside (and also for multifamily) in all communities that choose to do so at Recycle BC's cost. Recycle BC should work to phase out the use of foam but as this transition takes place, it should also offer curbside and multifamily collection.

Similar to where curbside services should be provided where there is curbside garbage collection, depot service should be provided for communities where there is a staffed garbage drop off option, if they choose to participate and also provide service through all willing retailers. All costs for this service including the proportion for use of space, equipment and staff time should be covered by Recycle BC.

Recycle BC needs to increase service, not decrease it. It is inappropriate to suggest communities that currently have service could lose it should the current provider decide to no longer provide the service. We fully support the ability for local governments to operate satellite depots and

recommend that Recycle BC cover their fair share of the costs, and include the greenhouse gas calculations in the Recycle BC total.

4.3.6 First Nations Collection

We appreciate the work that Recycle BC has done to enhance the recycling options available in First Nation communities, for Recycle BC materials and also for other EPR program products through the First Nations Recycling Initiative. Recycle BC is also to be commended for its collaboration with the Indigenous Zero Waste Technical Advisory Group. We feel that Recycle BC can build on this work through, not just providing financial offers to those communities that have the recycling capacity, helping communities build that capacity, fully funding Recycle BC's portion of the costs and working to eliminate wait times to access service. The comments regarding accessibility noted in the above sections also apply to First Nation communities - where there is a service for garbage drop off or collection and the community wishes recycling services for PPP, Recycle BC should provide them at its cost and in a timely manner. Where collection services are provided jointly to both a municipality and a First Nation, additional resources should be provided to ensure a high standard of service can be maintained given the different systems that may be required.

It is also important that collection of materials from the depots is in a timely and frequent fashion to ensure that storage of the materials does not burden the community and impact its ability to collect these or other EPR materials.

The support for community clean ups is fantastic and should be offered to other communities as well given that packaging is usually a key component of the litter.

4.3.7 Streetscape Collection

Streetscape collection addresses the need created when producers provide disposable items. Best practices are to ensure a reduction in disposable items (such as single use items) and provide and service clusters of bins that have all the options in one place and are wildlife-resistant in all but the most urban of locations.

The following recommendations will enhance the streetscape program:

- All local and First Nation governments should have access to a fully funded, Recycle BC streetscape program where they provide garbage bins, regardless of size or density of community
- Recycle BC should pay the full cost of bins for recycling for all communities with streetscape garbage
- Recycle BC should pay for and add option to pour liquids into (like Encorp's city plaza bins)
- Recycle BC should mandate organics collection bins to be paired with the Recycle BC bin and a waste option
- Set goal to decrease single use beverage cups and incentivize reuse programs. Offer collection services for reuse programs.

- Recycle BC should pay the cost for its products that remain in the waste to provide an incentive to producers to redesign the system, packaging and products that results in streetscape waste
- Note that the culture around sorting streetscape waste into recyclables, liquids, organics and garbage will take time but can be accelerated through work that Recycle BC can do across the product lifecycle (from product redesign and retailer engagement to generator education)
- If/when compostable PPP materials are collected and processed by local governments, Recycle BC should pay for its share of the services. It should not be up to local governments to market these materials nor process it themselves provided the quality can be provided

4.3.8 Financial Incentive Methodology

Recycle BC should pay for **all** of the costs that are required to provide the service and to keep the payment levels up to the increase in costs for **all** of the communities that wish service (including provision of bins). We agree that there should be a premium paid for multi-stream collection over single stream and penalties for contamination. The cost studies show that Recycle BC is paying below even the average costs to provide the services, let alone covering the higher costs that some communities may experience. This means that communities continue to subsidize the program or may not have suitable services. This needs to be rectified.

In 2022, it appeared that producers were paid to produce HDPE bottles or use aluminum packaging.³ While we wish to incent easier to recycle materials over hard to recycle packaging, all recycling of packaging should carry a cost to drive reduction. The program should instead consider paying to incentivize reduction and reuse systems. This may highlight a problem with how fees are calculated where a sudden increase in commodity prices can skew fees and shows the need to revise how fees are calculated.

Compliance (Free-Riders)

Recycle BC's plan should have a section on free-riders and Recycle BC should outline the actions it is taking to address free-riding companies (those avoiding their legal responsibility to comply and pay into the program). Addressing this issue is key to ensuring fairness, a level-playing field, fair distribution of costs, full transparency and achieving the redesign goals of EPR. Recycle BC should ask the Ministry to embark on a compliance promotion initiative targeting key sub-sectors of the economy where packaging is used in order to achieve compliance outcomes.

³ Recycle BC Fee Schedule 2022. https://recyclebc.ca/wp-content/uploads/2021/11/Recycle-BC_Fee-Schedule_2022.png

Overall

Collection of PPP needs to be a service that is offered in conjunction with option to dispose of garbage and it is Recycle BC's responsibility to provide this -at home, in apartments, for communities including First Nation communities, and at streetscape. This service needs to be permanently or frequently available. Mobile depots should be used to raise awareness of what can be collected but not as an alternative to a staffed permanent depot or collection from homes as it is unreasonable to require citizens to store packaging at home waiting for an intermittent and infrequent option to occur and this is likely to increase materials going into the garbage. Local governments need to be allowed to switch to direct service with Recycle BC easily (particularly given the costs are not fully compensated), but local governments should be able to provide some direction on operational aspects to increase diversion, ensure harmonized schedules and maintain the connection to residents. Service needs to be provided by Recycle BC to match garbage services, even if the community does not have a grocery store or if there is not a local organization that will provide the service. This program handles the most ubiquitous and frequently discarded type of products/packaging so the accessibility of services should be the highest of any EPR program.

Landfill Audits and Uncollected Materials

The use of waste composition audits is useful to see what PPP remains uncollected by the program, and the program should partner with other programs to conduct composition studies annually across BC. The results should be published on the Recycle BC website, and the details of the studies should be included in the annual report to the BC Government and made public. This data should be used to understand the degree of success of collection given the data missing on materials from small producers. Any local government or First Nation's government who requests assistance in funding a waste audit that includes residential PPP should receive appropriate funds and not need to go through the SABC request system. The goal should be to increase the data available to show program performance.

In addition, the program should pay local governments for materials that end up in local government facilities to both compensate them for the services rendered (and often the filling up of remaining landfill space with inappropriate materials) and to further incentivize design change by producers.

Finally, data should be gathered on mismanaged and littered material. Data from groups like the Ocean Wise Shoreline Clean Up and other clean up efforts (like Pitch In Day) can help to identify how much packaging is ending up in the environment. Producers should pay their fair share of the costs to clean this up, similar to what is being proposed in Germany.⁴

4.4 Post Collection

The focus on investments in mechanical recycling infrastructure, efficiency, transparency and local end markets are appreciated but care should be taken that the work to minimize

⁴ Euro News. <https://www.euronews.com/green/2022/11/03/germanys-new-plastics-bill-could-see-businesses-contribute-450-million-per-year-to-litter->

redundancy does not make it challenging for Recycle BC to secure future contracts or impact the resiliency of the network. The focus on technology should not come at the expense of innovation in the systems that result in the materials being discarded in the first place.

An additional key outcome should be to include environmental outcome by using the material at the highest level of the waste hierarchy as possible to move towards reduction (both volumes and toxicity of materials), reuse, avoiding downcycling, minimizing disposal to landfill and eliminating the use of materials as fuel (whether burned on a site or sent as fuel to be burned elsewhere). The Zero Waste Hierarchy should be used to develop systems for the PPP to be redesigned, reduced, reused and recycled. Investments in or use of “chemical recycling” or “chemical processing of plastics to fuel” should be avoided in favour of steps further up the hierarchy. We appreciate Recycle BC’s diligence in overseeing end market destinations and processors, with a preference for OECD countries and processors that meet standards. This is essential to operating a quality program and building trust in the BC system.

4.5 Dispute Resolution

The concern with the dispute resolution process is the inherent imbalance of power between Recycle BC and what could be a fairly small collector or even a small local or First Nation government. Current contracts are take-it or leave-it for rates that Recycle BC acknowledges will not even pay for the average of costs incurred. With the advent of the program, there is even less ability for a community, collector or processor to go it alone and market the small amount of materials an individual community may collect. Meanwhile, Recycle BC has been failing to meet its mandate to provide service to all of BC and paying 100% of the costs. In this context, recognizing these imbalances, there needs to be far greater options available to collectors, processors, and most importantly communities (including First Nation communities) to access a fair dispute resolution process (possibly including coverage of all costs of mediation or arbitration).

4.6 Communications

The communications program should not only work to increase awareness and make correct decisions on collection and recycling through its existing strategies, but also aim to change behaviour and offer options to reduce the amount of PPP used in the first place.

Recycle BC should determine if it is most effective to try to raise collection rates of poorly performing materials (i.e. low collection rates, low awareness levels, low marketability of materials such as flexible plastics, foam and film plastics) or if it is better to try to phase their uses out through strong program incentives to switch to reusables or other materials that have a strong and established recycling market.

Over time, for materials that can be recycled and for which Recycle BC can collect, it should work with producers to ensure the recycling labels in packaging are accurate with regard to recycling claims.

The program may also wish to do user surveys to understand where and why materials may be uncollected, including looking at awareness, accessibility, convenience and other barriers that may exist to collection. A target to raise awareness as well as an annual survey to measure it would be useful to better understand barriers that the program should address.

A survey of the collection network should be done to understand what areas could be improved from both a collector and customer perspective. This network is an asset and using the collective knowledge would be advantageous. Metrics on customer satisfaction and collector satisfaction should be added to the program with targets suitably high for such an established program. A secret shopper (or dropper) program should be implemented to understand the consumer experience and if the collection sites are welcoming of products and providing correct information. Work should also be done to improve and enhance depot-based communications (signage, ease of finding location on the internet, accuracy of information provided, etc.).

The goal should be to get 95% of the population aware of the program by 2024 (and later 100%) with work done to increase awareness of the new range of products. To do otherwise is to continue to externalize costs to the public and the environment. The program could also pursue disposal bans with local governments as a way to ensure consumers do the right thing but also that they are aware that throwing these products away is not appropriate. More research should be done on the portion of product that is not collected to understand who is not participating in the program and what marketing and behaviour change initiatives are needed.

Recycle BC should consider the need to provide information in multiple languages based on the make-up of the communities in BC. Programs may also need to connect with different audiences if there are different kinds of products used by different markets. Consider the demographics of BC with regard to languages and ensure the materials are produced in the suite of languages needed to reach multiple demographics.

Section 5 Program Performance

5.1 Managing Environmental Impacts

We appreciate that the program is seeking to innovate and encourage reduction, reuse as well as recycling but the plan should spell out what new steps the program will take to achieve this such as noted above and engaging directly with producers to do so.

We appreciate the work done by the Canadian Plastics Pact but this program is responsible for more than the members of the CPP and more materials than just plastic (though this is the most problematic material). Most of the focus of CPP to date has been on recycling and how to include hard to recycle materials and is only recently looking at phasing out poor material choices and reuse. The Golden Design Rules look at using slightly less plastic in packaging and increasing the value of the some materials (including flexible packaging) but offer no guidance

on how to eliminate unnecessary packaging and foster reuse and refill instead. The program should be taking direct actions with the producers on these elements.

5.2 Pollution Prevention Hierarchy

As noted above, we encourage the program to use the Zero Waste Hierarchy and to go beyond hoping that producers are taking their own initiatives to actually drive, inspire and fund initiatives by producers. In particular, we would like to see a set of commitments and actions for how the program is going to drive rethinking PPP (such as eliminating plastic wrap on magazines and newspapers), eliminating harmful and hard to recycle forms, reducing environmental impacts, reducing toxicity of PPP (including inks and additives), and fostering reusables and refillables (for single use items associated with food or bags but also for delivery packaging).

The European Union recently announced targets for corporations to develop the reuse economy. Recycle BC members should be incentivized through its fee structure to move to reuse of packaging. Reuse potential is significant to slow down packaging consumption and allow for migration upwards in the pollution prevention hierarchy.

Note that although the products in the packaging are not part of the program, packaging and those products are closely linked and packaging can drive wasted food in particular (examples such as cucumbers packaged in a set of five -each individually wrapped in plastic and then in a plastic overbag which will inevitably result in wasted cucumbers as most families will only use one or two). Recycle BC should look to integrate the learnings from the recent WRAP report regarding produce, best before dates and consumer education on refrigeration.⁵ The program should work with producers to stop encasing food in plastic as much as possible and to ensure that consumers have choice of quantity of items purchased.

Use of material as engineered fuel is burning the material, not material recovery. Material recovery would be if Recycle BC screened mixed garbage to recover metal. Rather than investing in research to recover non-recyclable material, we would urge Recycle BC to use those funds to phase out those materials. We applaud Recycle BC for its continued stance not to use waste-to-energy facilities but encourage it to expand those exclusions to include all facilities that burn waste (such as cement kilns, use of engineered fuel or any other) to minimize environmental harms and build public trust. We also encourage Recycle BC to avoid including hard to recycle packaging in other products (such as adding plastic to concrete) where it results in a mixing of material types and makes the finished product hard to recycle and makes it very hard for a future owner of the material to know what materials are included in it.

Plastic

Plastic has numerous problems: it is from a non-renewable fossil fuel source, it breaks down into microplastics that do not disappear in the environment, it has properties where it attracts

⁵ WRAP (2022). No Plastic Packaging -Sell fresh uncut produce loose... <https://wrap.org.uk/media-centre/press-releases/no-plastic-packaging-sell-fresh-uncut-produce-loose-says-wrap-report>.

and holds toxic materials, it can enter the bodies of numerous species – just to name a few. It has recently been added to the list of materials under the Canadian Environmental Protection Act and there is existing research pointing to a myriad of potential problems for the use of plastic and the challenges in cleaning it up. With that in mind, Recycle BC should be minimizing its risk and exposure to changes in the allowable uses and perceptions of plastic and subsequent declines in markets for recycled plastics. Actions such as working with producers to increase the use of glass and other inert materials for more local, refillable loops should be pursued.

5.3 Performance Targets

5.3.1 Program Recovery Rates

The program is expected to meet a 75% recovery (or more accurately collection) rate or a higher target set by the Director. Given that this recycling system and program is well established, far higher targets are suitable. The change to aligned recovery rates is suitable as is the change to exclude non-PPP that is collected.

Further recommendations include:

- Including an estimate of the PPP introduced by small producers and adding that to the denominator for a more accurate representation of the PPP introduced to BC.
- Changing the recovery (collection) targets to 95% (including the addition of the small producers material and exclusion of the non-PPP) for 2023 reaching 100% by 2027. Every bit of PPP not collected continues to burden the environment as well as local and First Nations governments. Recycle BC has shown that these higher targets are more suitable and achievable. It is unclear in the plan why lower targets than what has already been achieved would be appropriate for a program aiming for continuous improvement, nor why they are labelled as ambitious.
- Providing an actual recovery rate (PPP recycled [not including the portion that is not sold to market for recycling or goes to landfill or other disposal]/ total PPP introduced to BC [including from small producers]) and set a clear, ambitious target of no lower than 75%.
- Developing a metric that shows the total PPP introduced to the market per capita and setting targets for improving collection in each regional district. Note currently Peace River, Northern Rockies, Central Coast and Bulkley-Nechako are well below the others and this may be in part due to the lack of sufficient infrastructure and suitable incentives for service provision.

5.3.2 Material Category Performance Targets

It is good to measure the performance by material category but given that there is such a variation in the performance of plastic types, the program should break these categories further into each type of plastic (1, 2, 3, 4, 5, 6, 7, foam, plastic bags and overwrap, and other flexible packaging).

When targets are achieved or not or metrics go over 100%, there should be some explanation of what is changing in the system to influence these numbers in the annual reports.

Targets for the recovery (collection) rate should be 95% in 2023 for all materials rising to 100% by 2027 with the exception of flexible plastic and foam which should have targets to decrease their use in packaging.

As noted above, the supply of PPP from small producers should be included in calculations of results for these targets as well. There should be actual recovery rates (how much of total PPP introduced into the market was recycled) with clear, ambitious targets no lower than 75%.

5.4 Performance Metrics

We support the collection/recovery rate metrics listed including reporting by Regional District but the program should also report by community (including contamination rates) and provide this data direct to each community.

The Accessibility metrics are also useful but should include a target to cover 100% of communities (including First Nation communities) with curbside or staffed drop off of garbage by 2027. Other metrics should show:

- the percentage of total population with service as well as percentage of communities (but not including communities served only with irregular, infrequent mobile collection events)
- Percentage of multifamily households serviced by community
- the percentage of each of total estimated costs that Recycle BC pays for collection (by curbside, multifamily, depot and streetscape), transport and processing as well as the total percent that Recycle BC pays for all of collection, transportation and processing

The Consumer Awareness Target should be 95% increasing to 100% by 2027. Metrics should include surveys to understand why residents do not use available systems.

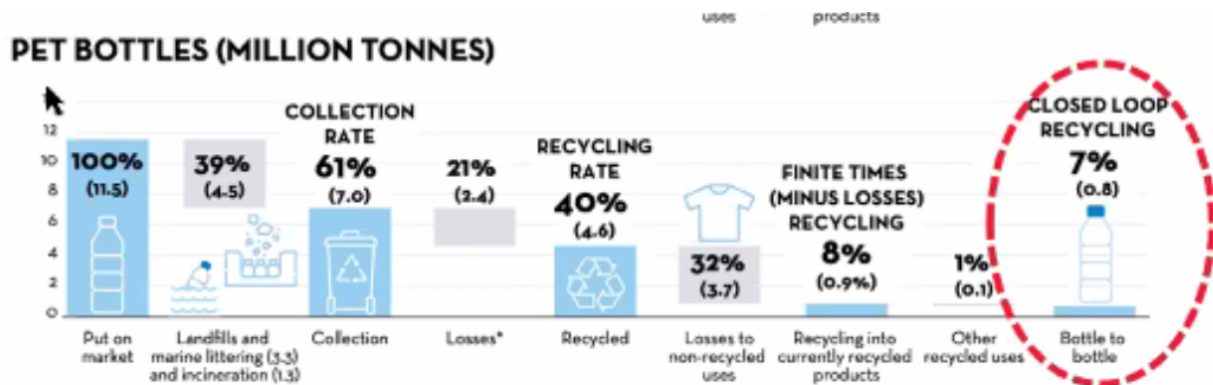
Pollution Prevention Hierarchy Targets should include targets for collected PPP to reuse and recycling commodity markets (excluding use as engineered fuel). Targets and metrics should be set for:

- The number of producers directly contacted and the changes producers made to their packaging (to increase each year)
- Reduction of PPP in total (mirroring or exceeding the legally binding reduction targets in the EU) and reduction of specific hard to manage types (all flexible plastics, expanded polystyrene, etc.)
- Amount of PPP that has been reused or refilled (mirroring or exceeding the legally binding reduction targets in the EU that include four sectors: takeaway hot/cold beverages 80%, takeaway food 40%, E-commerce 50% and transport packaging)
- Decreasing use of virgin fibre in printed products
- Decreasing toxic dyes and additives in PPP (including PFAS and similar)
- Decreasing the amount of material disposed aiming for zero by 2027

- Decreasing downcycling and increasing upcycling. The program should be more transparent about the retention of value in its materials
- Sector-specific recycled content
- Number of waste composition studies Recycle BC participated in and funded its share
- Decrease in amount of PPP found in waste composition audits
- Number of community clean ups funded and amount and type of materials collected (as well as a brand audit to help allocate costs fairly)
- A target of zero for engineered fuel, waste to energy and any other process that results in the destruction of the materials and report on any materials that go to these systems.

The program should report annually on:

- The percentage of the market not paying into BC's recycling system (including the small producers) as well as:
 - Number of outstanding free-riders Recycle BC and CSSA are pursuing in its reporting cycle
 - Number of compliance referrals made by CSSA to the ministry for compliance follow-up
- The number of corporate members with ESG frameworks with annual reporting to support upstream corporate actions
- A list of incentives and programs that Recycle BC has undertaken to drive redesign, reduction and reuse/refill
- The results of these incentives and programs
- Comparison of communities with higher costs and the collection and recovery rates. Similarly for single stream versus multistream collection
- The circularity of its packaging (like-to-like) as in the figure⁶ below:



⁶ Credit: Zero Waste Europe.

Note that the 2021 Recycle BC Annual Report mentioned a 77% Provincial Recycling target. Is this a new target established by the statutory decision maker for Recycle BC to benchmark its performance recovery rate? Annual reports should explain the source of these numbers.

GHGs

Recycle BC has reported on its scope 1 and 2 emissions and some aspects of scope 3 but a further analysis of the full systemic GHGs from packaging (as well as the interrelationship with the products) should be done, followed by the development of a strategy to decrease the system-wide GHGs through less packaging, more reuse of packaging and more localized loops of product delivery.

GHG emissions should have a target to decline each year through smaller loops of materials, especially with reuse. Note that too often plastic is touted as a way to save GHGs over the use of glass but refills and reuse of glass in local loops is far preferable to plastic transported long distances. The measurement of GHGs should be for systemic emissions and not solely for direct program operations.

Costs are another important measure and should include costs saved by local governments (and their taxpayers) and from reduced environmental harms (as well as ongoing environmental harms). A measure should be presented for total costs and remaining externalized costs.

Financial transparency should be a goal and Recycle BC should provide detailed financial information annually.

As newspaper metrics are collected by another party, reporting of similar metrics to the above where suitable should be requested.⁷ Recycle BC and the MOECCS should work to ensure that newspapers and newsprint remain regulated items.

Section 6 Consultation

Recycle BC is to be commended for engagement with environmental groups as well as local governments, First Nations, Regional Districts and others and we hope that this raises the bar for other programs and engagement. We hope that the program will integrate the feedback to make as strong a program as possible.

⁷ While newspapers have a slightly different system, note that we fully support the inclusion of newspapers under the Regulation and the requirement to fully pay their full share of costs. While the industry may be experiencing challenges and is vital for a thriving democracy, allowing ongoing externalization of costs is not appropriate. The industry requires support by addressing the root causes of the current challenges instead rather than a free pass on pollution and producer responsibility.

Institutional, Commercial and Industrial (ICI) PPP

This material is not regulated yet but there is a very strong interest in having producer-funded systems to handle this material as well. Often the materials are exactly the same as the residential PPP with the same producers. In fact, items purchased in retail stores may have been accounted for in the Recycle BC program and end up in an ICI setting where it is not accepted for recycling as part of the program. There are many synergies that could be had from addressing all packaging and more opportunities that would open for redesign and reuse from an integrated comprehensive system. Small communities, in particular, that had collected recycling prior to the advent of residential PPP EPR were challenged to collect, market and transport the remaining portion which resulted in the cessation of ICI recycling in some cases. We recommend that Recycle BC examine the opportunities to bring about an integrated system and leverage its knowledge of recycling PPP in BC to be prepared to offer its services in advance of regulatory change.

In conclusion

The program plan needs stronger targets and more ambition in achieving the outcomes intended by the CCME Canada-wide Action Plan for EPR. This plan renewal, at a time when BC is planning to develop a Circular Economy Strategy and the recent UN Biodiversity agreement emphasizes the need to minimize our collective impact, is an opportunity to strengthen governance, reduce environmental impacts and the efforts and initiatives in this area should be strengthened, alongside the creation of related targets for redesign, reduction, reuse and refill. That said, we look forward to continued improvement of this program.

Sincerely,
Sue Maxwell,
On behalf of Zero Waste BC

Jamie Kaminski
On behalf of Zero Waste Canada



January 6, 2023

Recycle BC
405-221 West Esplanade
North Vancouver, BC

Sent by email to: consultation@recyclebc.ca, [REDACTED]

Re: Recycle BC EPR Plan Consultation Input

Thank you for working with the BC Bottle and Recycling Depot Association (BCBRDA) to host a consultation session for Depots on November 19, 2022, and then a follow up discussion with representatives of our Board of Directors on December 16, 2022, to initiate discussion about potential solutions to our members' concerns. Your staff have actively listened to Depots, including our members, and we believe that Recycle BC is making a genuine effort to understand them and build a productive working relationship.

We also appreciate your willingness to extend the deadline for the BCBRDA's written input into Recycle BC's proposed Packaging and Paper Product (PPP) EPR Plan: 2023-2028 (EPR Plan) to January 6, 2023, allowing us to collect more input from member Depots to offer better informed recommendations. We are happy to meet with you again in the coming weeks to keep momentum from our December meeting and discuss our comments, including our proposed recommendations. We are eager to arrive at a path forward that will resolve our members' most pressing issues and help Recycle BC meet its program goals and regulatory requirements.

1 Who we are

The BCBRDA is a member-based organization that represents nearly 100 of British Columbia's (BC) Bottle and Recycling Depots (Depots), almost half of which are contracted as Recycle BC collection sites.¹ The BCBRDA is led by a volunteer Board of Directors made up of Depot owners. It is also the chosen representative of its member Depots, each of which has signed a "Letter of Representation" that enables our association to represent it in contract negotiations with Producer Responsibility Organizations (PROs).

BC's Depots have a long history of meeting the recycling needs of British Columbians. They have been part of BC's regulated recycling sector for 50 years and many have served their communities for much longer. They operate in all urban centres and many rural communities across the province. They service other EPR Plan holders, in addition to Recycle BC, to provide British Columbians with the benefits and convenience of one-stop, seamless recycling opportunities. They actively and proudly work to meet consumers where they are at in their recycling journeys and encourage and support them to participate in a wide range of recycling programs. Among Depots' ongoing accountabilities are:

¹ Across BC there are 51 Bottle Depots/Return-It Depots that collect materials to support Recycle BC's stewardship plan. Retrieved from Recycle BC, 2022. Annual Report 2021. Available at: https://recyclebc.ca/wp-content/uploads/2022/06/RecycleBC_2021_Annual-Report_Final.pdf

- Providing consumers with convenient, expedient, safe recycling opportunities.
- Reassuring consumers that their materials will be recycled, and answering consumers' questions about BC's regulated systems, recycling processes, and recycling outcomes.
- Cleaning up items that are not part of BC's regulated systems but consumers leave behind in the hope that the Depot will find a recycling option for them (i.e., "wish-cycling") or to save the cost, time, and hassle to find an alternative appropriate disposal option (i.e., illegal dumping).
- Directing consumers to resources that provide helpful information about reuse and recycling options in BC, including Recycle BC's "What goes where" app.

2 Overall comments

On behalf of our members, the BCBRDA's primary concern with Recycle BC's proposed EPR Plan is that it lacks a transparent, evidence-informed cost methodology to:

- determine costs to manage Recycle BC materials, including for private, for-profit Depots' (i.e., small businesses contracted as Recycle BC collection sites); and
- determine a fair rate of return for private, for-profit Depots' services.

This is not a new challenge that solely exists within Recycle BC's proposed EPR Plan. It is an ongoing challenge with Recycle BC's program and the BCBRDA and our member Depots are anxious to see it addressed through Recycle BC's current consultation process and resulting final EPR Plan.

In discussion with BC Depot operators, including our members, the BCBRDA has found that Depots are significantly subsidizing Recycle BC's away-from-home collection system and are concerned with Recycle BC's:

- January 1, 2023, addition of even more materials to their Depot collection system (i.e., single-use products and packaging-like products like lightweight flexible packaging) will add to Depots' subsidization of the Recycle BC system.
- Weight-based approach to paying its service providers for the collection of designated PPP materials in super sacs, which does not cover the labour-, equipment-, or space-related costs of managing lightweight PPP (i.e., mixed plastic containers, foam packaging, and plastic film / flexible packaging) or mixed fibre (i.e., printed paper, boxboard, and cardboard) and results in Depots subsidizing Recycle BC's system.
- Position that previous fee increases have been significant (i.e., foam packaging and plastic film) when they have only applied to low-volume, lightweight materials, do not extend to materials that are higher-volume and / or higher-weight materials that require significant equipment and labour to manage (i.e., mixed plastics, cardboard, glass), and have resulted in minimal dollar value increases that are insufficient to cover Depots costs - let alone provide any opportunity for profit.
- Adherence to the outcomes of its Packaging and Paper Product Collection Costs – 2019 Cost Study (completed in July 2020) when Depots, and recognizably, businesses everywhere are undeniably operating in an entirely new cost paradigm that was set in motion in spring 2020 with the start of the global pandemic and has been fueled by environmental events (i.e., forest fires, flooding, and more driving up insurance costs), an extremely challenging labour market (i.e., low

unemployment rate resulting in higher wages), an unstable global environment (i.e., driving up heating and transportation costs), and the highest inflation rates in more than 40 years (i.e., driving up all aspects of business expenses from administration to assets and asset management to rent and mortgage payments).

In addition, we learned that some of our members have stopped serving Recycle BC due to insufficient fees, are redirecting high-volume customers to municipal collection sites to avoid the costs of managing costly materials like mixed fibre, and others are only serving Recycle BC because the minimal fees received are a better alternative than paying all the costs of consumers wish-cycling and dumping materials at their Depots.

In response to the above, the BCBRDA and our members recommend Recycle BC adopt a transparent, evidence-informed methodology to determine producers' full cost and establish a fair fee structure that not only covers the basic costs of material management at Depots in current and anticipated market conditions but also provides a fair rate of return to for-profit businesses. Recycle BC has an obligation to be transparent and detailed enough in its consultation on its methodology that it enables the BCBRDA and our member Depots to determine how it sets its fees. As part of this methodology, the BCBRDA and our member Depots would also expect Recycle BC to recognize that municipalities, non-profit organizations (e.g., charities), and private, for-profit Depots (i.e., small businesses) require different fee structures. Although it goes against the intent of EPR, municipalities have the option to subsidize Recycle BC through municipal taxation, the use of existing taxpayer-owned infrastructure (e.g., free access to landfills and landfill equipment), and the avoidance of insurance costs and both municipalities and non-profits can aim to 'break-even.' Small businesses on the other hand are enterprises that cannot, should not, and do not want to be expected to subsidize Recycle BC's program. They must be able to cover their costs and are entitled to a modest rate of return as a service provider.

3 Process to Determine Depot Costs

In Recycle BC's proposed EPR Plan, it describes its process for setting financial incentives for collectors (e.g., Depots) as follows:

"Consistent with an outcomes-based approach to program operations, Recycle BC offers financial incentives to collectors participating in the program. These incentives are designed to provide collectors with sufficient incentive to collect the amount of PPP required by Recycle BC to meet its targets and to cover fair and reasonable collection costs borne by contracted collectors operating efficient programs. Towards the end of each contract term Recycle BC develops a set of revised financial incentives that are proposed to collectors in conjunction with new services agreements. The steps to prepare the revised financial incentives are:

- *Undertake a collection cost study and associated analyses to assess existing incentives in the current market context and any necessary adjustments in order to propose revised financial offers for consultation with collectors;*



- *Hold consultation sessions with collectors to review the proposed financial offers, discuss, answer questions and request feedback; and*
- *Review all feedback provided to finalize the financial incentives that will comprise part of the published collection services agreements."*

This is the same process that was used during the last fee review process. The output of that fee review process was for Recycle BC to set a fee structure that pays Depots (for example) an average of \$3.50 to manage a single super sac of mixed plastic containers. This \$3.50 is meant to cover Depots':

- Labour to receive and stage Recycle BC mixed plastic container collection bags.
- Space to store the bags on Depot property.
- Labour to educate and answer consumer questions about 'what goes where.'
- Labour to remove contamination in super sacs when - despite our communication and guidance - consumers wish-cycle or dump materials they believe should be collected by Recycle BC's system.
- Labour to move full bags to onsite storage.
- Labour to move bags from storage to the loading areas for pick-up.
- Labour to load Recycle BC trucks with super sacs.
- Labour and transportation costs to dispose of contamination/dumped materials left behind by Recycle BC consumers at local landfills.
- Labour to file paperwork with Recycle BC.
- Costs associated with meeting Recycle BC's Collector Qualification Standards, including maintaining appropriate insurance and meeting basic building requirements.

To make Depots' concern with unfair fees explicit, Recycle BC's fee of \$3.50 for a super sac of mixed plastics provides for ~13 minutes and 42 seconds of labour at minimum wage and provides for no space, storage, or equipment costs to manage a super sac over its full lifespan at a Depot. This calculation is generous given that it assumes Depots are paying their staff minimum wage – an unrealistic option with today's costs of living and competitive labour market across the province – and that they incur zero additional costs to provide service to Recycle BC consumers. **In other words, even under the most conservative, circumstances, Depots would still be losing money to collect Recycle BC's mixed plastic materials.**

However, this is not a mixed plastic container problem alone. The cost estimations to manage mixed fibre (mixed paper, boxboard, and cardboard) collection and baling / compacting are even more dire.

- Mixed fibre can be collected and delivered to Recycled BC in a super sac, in bins and baled, or in a compactor and stored compacted in a roll-off bin. Compactors and roll-off bins can be owned by Depots (through in-Depot investments) or owned and placed onsite by Recycle BC. Mixed fibre is a heavy material that requires machinery to manage (e.g., bobcat and/or pallet jack to move in super sacs, and either a downstroke baler to bale, or a compactor to compact). If baled, there is

extensive labour to run the baler. Many Depots that bale have a dedicated full-time equivalent (FTE) position (i.e., 40 - 45 hours per week) just baling mixed fibre. Recycle BC pays different fees for unbaled fibre, baled fibre, and compacted fibre. Notably, Recycle BC pays less for compacted fibre (which reduces Recycle BC's airspace in transport), which means that Depots that have invested in compactors to produce a more compacted product for Recycle BC (and providing Recycle BC with transportation efficiencies) are penalized for that investment. It must also be noted that:

- The fees for unbaled fibre do not cover the labour, space, or equipment costs (\$60 / MT).
- The fees for baled fibre are better, but still do not cover the full cost of labour, space, nor equipment costs (i.e., \$60+\$110/MT for a total of \$170MT) –some Depots are wearing out the balers necessary to manage Recycle BC's material faster than they can amortize them.
- The fees for compacted mixed fibre where Recycle BC owns the equipment are the same as unbaled fibre, and do not cover the space for the equipment or labour to manage the equipment (\$60/ MT).
- The fees for compacted mixed fibre, where the Depot owns the equipment, do not cover the space, labour, nor the Depot's investment in equipment costs (\$60 MT). Where Depots own the equipment, the rate paid for compacting fibre should not be less than the rate for baling fibre as this discourages Depots from investing to improve efficiency – which in turn significantly reduces Recycle BC's transportation costs or need to invest in compactors/roll off bins.
- None of the fee offerings provide a reasonable rate of return on services for for-profit small businesses.

4 Addressing the perception of “passively managed” super sacs

As Recycle BC considers Depots' substantiated concern with its fee structure, the BCBDA and our members would also like to address what we have heard as one the core assumptions that Recycle BC uses to justify its fee structure. We are aware that Recycle BC has communicated to Depots that it believes its super sacs and bins are “passively managed.” **This is inaccurate.**

In addition to the most obvious scenario, where Depots cannot avoid the labour required to receive, stage, and move super sacs for Recycle BC collection and the cost of providing and managing “floor space”, Depots also incur labour costs associated with consumers' need for support and education regarding where to place their materials, how to prep their materials appropriately (e.g., removing contamination, collapsing boxes, removing lids and nozzles from container bodies), and where to take materials that are not part of Recycle BC's program. Depots also, as we have noted above, incur the costs of managing materials that have been wish-cycled or illegally dumped despite their best efforts to educate consumers on what can be recycled and where it can be recycled. These are not costs that are unique to Depots as they occur in curbside collection carts and bins and at municipal depots and they are costs that Recycle BC would have to pay if it ran its own sites. The current reality is:

- when Recycle BC's curbside collection service provider 'bids' to provide services, it can estimate and account for these costs,

- when municipalities choose to operate collection sites they can – although arguably should not - subsidize their operating costs with taxes, but
- when small independent businesses Depots are given a ‘take-it-or-leave-it’ offer their only option is to accept fees that are too low to cover their costs let alone provide a reasonable rate of return on their services or, as we have already mentioned, incur the often steep costs of consumers wish-cycling and dumping Recycle BC materials at their locations.

We also want to ensure that Recycle BC understands the extent of the support and education that consumers seek from Depots, and how this demands time and thereby increases Depot labour costs. The following is a representative though not necessarily exhaustive list of the support and education that consumers seek from Depot staff:

- Understanding Recycle BC’s ‘changing’ material inclusion lists, whether Recycle BC is adding pilot programs or adding new materials to its program voluntarily or due to a change in regulation.
- How to manage packaging with remaining contents (e.g., aerosol cans with remaining hairspray, cleaner, or cooking oil, coffee pods with coffee grounds remaining).
- Whether they can leave caps/lids/nozzles on their plastic PPP containers.
- How to manage PPP designated by Regulation but voluntarily excluded by Recycle BC’s system (e.g., compostable or biodegradable plastic packaging, padded envelopes, stand up pouches, paper bags with a foil or plastic layer, cardboard with a wax coating, liquid-absorbing pads on meat trays, plastic bowls with metal rims such as those for soups, and even metal hangers, which fit the definition of packaging when provided by a dry cleaner).
- How to manage non-program, PPP-like materials (e.g., non-designated PPP plastic lids or covers, propane tanks, helium tanks, other metal items, milk containers vs deposit excluded dairy containers - like buttermilk, ceramics, plastic buckets and baskets - like reusable Tupperware containers - that carry Resin Identification Codes or a mobius loop, CD cases, paperback books, and even the blue bags they use to transport their Recycle BC materials to Depots).
- How to manage designated PPP properly at a Depot (i.e., Depots often get asked why the materials cannot just go into one bin like they do with curbside or encounter consumers that wish to apply this approach regardless of the information provided to them).
- Depot operators must also watch for and refuse service to small businesses who ‘try to skirt the system’ and place their industrial, commercial, and institutional (ICI) PPP, which often looks very similar to residential PPP, in our bins.

Consumers might not know what a Producer Responsibility Organization (PRO) is or who Recycle BC is, but they do have decades of experience visiting Depots. As a result, it is Depots who build relationships with consumers and, by the same token, it is Depots who shoulder the costs of supporting those relationships and managing the impacts of consumers who, despite Depots’ willingness to answer questions, do not take the time or show the courtesy to manage their materials properly. While not directly related to Recycle BC’s proposed EPR Plan, the BCBDRDA and our members do have suggestions about how Recycle BC and other PROs could work collaboratively to generate common and less confusing messaging and signage to avoid consumers becoming ‘sign blind’. This would help to reduce Depots’ costs,

which, in turn, would benefit Recycle BC and other PROs by reducing what they should already be paying in terms of costs associated with Depots collecting their materials.

5 Conclusion

The Ministry's policy guidance document "Producers Paying the Cost of Managing Obligated Materials and Dispute Resolution"² and its requirements for a PRO related to consulting on its cost methodology, the document describes satisfactory consultation as:

"providing material to describe the methodology used by the producers to demonstrate the proposed basis of compensation for services rendered...The methodology should be transparent and detailed enough to enable stakeholders to clearly determine implications to their interests; it should not contain a range of variables that may be considered, or insufficient justification for compensation offered. In addition, plan holders should provide stakeholders opportunity for input into any future changes pursuant to Section 5(1)(b) of the Recycling Regulation".

Given that Recycle BC has not been transparent and detailed enough during consultation on its fee setting methodology for the BCBRDA and our members to understand how fees are set and provide input into the cost methodology approach, we must assert that Recycle BC has not met its legal requirements to ensure producers are paying the full cost of managing their materials across BC's Depot collection network, as required by the *Recycling Regulation* and described in the Ministry of Environment and Climate Change Strategy's (the Ministry) guidance documents.^{3,4}

In addition to this, the BCBRDA has gone to extensive effort to understand an average of several Depots' most basic costs as they relate to accepting, managing, storing, moving, and providing the necessary education and administration to collect Recycle BC's materials. Even with our very conservative estimates that, given our timeframe and available information, in no way reflect a comprehensive set of Depots' full costs, we have confirmed that Recycle BC is not paying Depots' costs – and therefore producers' full costs - let alone a fair rate of return for our services.

² Government of British Columbia, Ministry of Environment and Climate Change Strategy, 2018. Producers Paying the Cost of Managing Obligated Materials and Dispute Resolution. Available at: <https://www2.gov.bc.ca/assets/gov/environment/waste-management/recycling/recycle/rel-res/guidance-producer-pay-the-cost-and-dispute-resolution-2018.pdf>

³ Government of British Columbia, Ministry of Environment and Climate Change Strategy, 2012. Recycling Regulation Guide. Available at: https://www2.gov.bc.ca/assets/gov/environment/waste-management/recycling/recycle/recycle_reg_guide.pdf

⁴ Government of British Columbia, Ministry of Environment and Climate Change Strategy, 2018. Producers paying the cost of managing obligated materials and dispute resolution. Available at: <https://www2.gov.bc.ca/assets/gov/environment/waste-management/recycling/recycle/rel-res/guidance-producer-pay-the-cost-and-dispute-resolution-2018.pdf>

6 Recommendations for Recycle BC

Recycle BC asked for specific recommendations from Depots about how to resolve the issue of Depot subsidization of the Recycle BC program. In the absence of an evidence-informed cost study that reflects private, for-private Depots' costs in the current market and business environment and which we believe would result in significant increases in Depot fees, we suggest the following as necessary measures:

1. Provide the following interim increases for Recycle BC products:
 - For unbaled, mixed plastic containers shift Recycle BC's payment model to a per full super sac unit basis and, until a comprehensive cost study can be complete, provide Depots with an interim fee increase to **\$7.23 per super sac (current average paid is \$3.50 per super sac)** effective as of January 1, 2023 – with backpay to accommodate the fact that we are past this timeline and Depots are accepting new materials on behalf of Recycle BC as of January 1, 2023.
 - For unbaled mixed fibre collected and managed by super sac, shift Recycle BC's payment model to a per full super sac unit basis and, until a comprehensive cost study can be complete, provide Depots with an interim fee increase to **\$8.38 per super sac or an equivalent fee on a metric tonne basis (current average fee paid is \$4.20 per super sac or \$60 MT)**.
 - For baled mixed fibre provide a fee increase to **\$69.95 per bale** converted to a fee per metric tonne (**current average fee paid is \$63.92 per bale or \$170/MT, including \$60 collection and \$110/MT baling incentive**).
 - For **compacted fibre where the Depot owns the compactor and roll off bins**, provide the same fee on a metric tonne basis as is provided for baling fibre. This will provide incentive for Depots to become more efficient and produce a better product for Recycle BC that in turn reduces Recycle BC's transportation costs.

Note: See Appendix 1-7 for support for the interim increases estimates. These estimates are generalized, conservative, and based on basic costs and an informed, modest rate of return. These estimates are not intended to mirror, reflect, or have the rigour of a cost study that includes collecting data from a representative sample of private, for-profit Depots towards building a defensible financial model that assesses and weights Depots' costs.

2. Commit to undertaking a credible and transparent cost study that would be completed in less than one calendar year, and work with the BCBRDA to ensure a representative sample of private, for-profit Depots' data can be collected and used. As part of this commitment, also commit to 'making Depots whole' after the cost study to back pay any outstanding fees to January 1, 2023.
3. Once a fair rate of return is determined, ensure contract 'triggers' that would require a reassessment of fees based on triggers such as appropriate inflationary forecasting, pandemics that require special protocols, etc.



4. Act as a catalyst and champion with other PROs' and the Ministry of Environment and Climate Change Strategy to recommend and develop a Ministry-led, PRO-funded universal cost study, which will help take the guesswork out of the expectations regarding producers paying their full cost and cost-share the full-scale study amongst PROs. This would reduce the costs of regulatory compliance for all PROs using Depot services and ensure there is no cross subsidization between PROs.

7 Summary Comments

We want to stress that the BCBRDA and our members recognize and value the opportunity to work constructively with Recycle BC on a mutually beneficial partnership to help British Columbians manage Recycle BC materials effectively. We consider our meetings to date and the spirit of this submission to be important steps on this journey.

We also consider our recommendations for Recycle BC to provide Depots with interim fee increases necessary to ensure Depots' viability and ongoing participation in Recycle BC's system. We must stress that the proposed interim fee increases represent a conservative and non-comprehensive view of Depots' costs as well as a reasonable and informed return of 5.39%. We are in no way intending to replace a determination of fees through a valid and transparent cost study involving a representative sample of Depots that in turn informs a valid and transparent financial model. Instead, we are proposing that interim fee increases should be viewed as:

1. A mutual commitment to work together on the success of Recycle BC's system while a full cost study is completed over the course of the coming year.
2. Recycle BC's commitment to be paying producers' full costs when even the most conservative cost estimates show this is not happening.

Again, we are more than happy to discuss any and all aspects of our submission with you, including the requested solutions, and look forward to moving forward productively together.

Sincerely,

A handwritten signature in dark ink that reads "Cara Heck". The signature is written in a cursive, flowing style.

Cara Heck,
Board Chair, BC Bottle and Recycling Depot Association (BCBRDA)

Appendix 1: Average Depot Labour Costs

Depot	Average wage
Depot X - with benefits included	\$22.41
Depot X - with benefits included	\$23.93
Depot X - with benefits included	\$21.77
Depot X - with benefits included	\$19.03
Average hourly wage -with benefits included	\$21.79
Average wage per minute	\$0.36

Appendix 2: Calculation of allowable minutes of labour at minimum wage versus actual average wage for mixed plastic containers given Recycle BC's current payment of \$3.50 per super sac.

Allowable labour at \$3.50 / super sac of plastic material, if paid minimum wage		Allowable labour minutes
Minimum wage		\$15.65
Minimum wage per minute		\$0.26
Average pay per mixed plastic super sac		\$3.50
Total minimum wage minutes per super sac at \$3.50		13.42 minutes

Allowable labour at \$3.50 / super sac of plastic material, if paid <u>average</u> wage		Allowable labour minutes
Average hourly wage -with benefits included		\$21.79
Average wage per minute		\$0.36
Average pay per mixed plastic super sac		\$3.50
Total average wage minutes available to manage a mixed plastic super sac at \$3.50 / tote		9.64 minutes



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Appendix 3: Calculation of cost per square foot at an owned Depot, including insurance. (This is not market rate, no equipment included.)

Depots	Average cost
Depot X	\$28.22
Depot X	\$32.29
Depot X	\$26.85
Depot X	\$24.95
Average	\$28.08

Appendix 4: Minutes of actual management across four Depots

Material	Start day - set out and staging	End day - closure to limit overnight dumping	Stage new super sac -upon fill	Customer area monitoring ⁵	Daily fill management: ⁶	Load Recycle BC Truck	Manage Recycle BC paperwork (inventory management and tracking)	Baling ⁷	Minutes to manage one super sac for collection / to make one bale of fibre
Mixed plastic containers - collection in super sac,	2	2	0.5	5	4.5	1	0.5		16
Mixed fibre - Collection in super sac,	2	2	0.5	5	7.5	1	0.5		19
Mixed Fibre - Baling, (takes 18 super sacs to make one bale).								179	179

⁵ This includes ensure residential materials only (2.5 minutes of staff on site); customers' education on 'What goes where? What is accepted?' (2 minutes). This is an average across all material collected in super sacs.

⁶ This includes check, remove, and dispose of contamination; manage dumped materials; compress plastics and collapse boxes to maximize tote weights; move to storage area for stacking (fibre heavier, requires pallet jack).

⁷ This includes Move super sacs from supply inventory to bale area, fill baler with 18 totes, move bale to truck, process bale, offload bale.



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Appendix 5: Expected labour revenue to manage materials across four Depots

Total cost of labour at Depots	Average wage cost per minute to manage one super sac	Labour time in minutes to manage one super sac of material	Total labour cost per super sac	Return on Investment* (Based on ROI legally established for Depots in Alberta)	Total labour (per super sac or per bale)
Mixed plastic containers -super sac collection	\$0.36	16	\$5.63	5.39%	\$5.93
Mixed fibre -super sac collection	\$0.36	19	\$6.72	5.39%	\$7.08
Mixed Fibre -bale (takes 18 super sacs to make one bale)	\$0.36	179	\$65.14	5.39%	\$68.65

Appendix 6: Expected revenue for space to manage materials across four Depots

Total cost of space at Depot	Average cost per square foot per day. Assume each super sac/bale is onsite for one day.	Space (square feet) for one super sac or one bale of fibre. (Both fit on a standard pallet.)	Total space cost	Return on Investment* (Based on ROI legally established for Depots in Alberta)	Total Depot space revenue per super sac / bale (i.e., fit on one standard pallet)
Mixed plastic containers -super sac collection	\$0.08	16	\$1.23	5.39%	\$1.30
Mixed fibre -super sac collection	\$0.08	16	\$1.23	5.39%	\$1.30
Mixed fibre -cost to make one bale from 18 super sacs	\$0.08	16	\$1.23	5.39%	\$1.30



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Appendix 7: Total recommended interim fee to manage materials across four Depots

Material	Total Depot cost to manage one super sac / one fibre bale	Current Recycle BC pay
Mixed plastic containers - collection in super sac	\$7.23	\$3.50 / super sac
Mixed fibre -collection in super sac	\$8.38	\$60/MT or average of \$4.20 / super sac
Mixed fibre -bale	\$69.95	\$60 MT (collection) + \$110 (baling) for a total of \$170 /MT. This equates to an average of \$63.92/bale.

From: Young Nam [REDACTED]
Sent: November 30, 2022 3:41 PM
To: Recycle BC Consultation
Subject: Appendix C – Community Eligibility Criteria

CAUTION: This email originated from outside of the organization.

Hello,

I am very concerned about 'Appendix C – Community Eligibility Criteria' in your proposed plan.

The currently proposed Appendix C will cause more recyclable goods ending up in landfills, and will discourage community members from recycling. Because of inconvenience it will create for smaller communities.

I would like to see more encouragement for recycling in smaller local communities, but this proposal may defeat the purpose. We rather need more easily accessible recycling collection centres across BC.

Make recycling easy, not complicated.

Thank you.

--

Regards,

Young Nam

Boucherie Self Storage & Bottle Depot

2711 Kyle Road,
West Kelowna, BC V1Z 2M9
(250) 769-7122
[REDACTED]

[Follow us on Facebook](#)

From: Niki Roberts [REDACTED]
Sent: December 8, 2022 3:28 PM
To: Recycle BC Consultation
Subject: Feedback on Recycle BC Program Plan: Compensation

CAUTION: This email originated from outside of the organization.

FEEDBACK ON RECYCLE BC PROGRAM PLAN - Compensation for service provided by recycling depots

The Pender Island Recycling depot suggests that Recycle BC compensates depots in areas without curbside service at minimum at the same per household rate that they compensate curbside service. The Pender Island recycling depot collects the same volume of packaging and printed paper (PPP) per person as the Recycle BC average and paying for this service at the curbside rate would cover our cost. Also, depots are essential to Recycle BC for collecting material not captured in curbside service and the service that depots provide should be compensated accordingly.

In 2021, the Pender Island Recycling Depot collected 121,515 kg of PPP, which worked out to 43.8 kg per person and was in-line with the average amount of PPP collected per person in BC (43.1 kg). (According to Stats Can census data in 2021, North and South Pender had a combined population of 2,773 people).

In 2021, there were 1,983 dwellings on North and South Pender. The average cost per household in BC for curbside service was \$50. If the recycling depot were compensated at the curbside rate, Recycle BC would pay \$99,150 for the recycling service on Pender Island. This amount would come within 4% of compensating the Pender Island Recycling Depot for the 52% of the total operating costs that are associated with the collection of PPP.

Depots are essential for collecting soft plastic, flexible plastic, and styrofoam. These material categories require dedicated staff time to supervise drop offs and to educate the public on proper sorting. Depots are essential to Recycle BC if they are achieve the targeted recovery rates of these materials. Unfortunately, the current per tonne compensation rates come nowhere close to covering the depot operating costs attributable to PPP collection and leave regional governments to cover the shortfall.

Lastly, inflation, labour shortages, and increased transportation costs are affecting depots just like they are affecting curbside service. Any forthcoming increases to curbside compensation rates should be applied to depot compensation rates as well.

Thank you for considering our perspective on this issue.

Kind regards,
Niki Roberts

--

Niki Roberts
Manager
Pender Island Recycling Depot
Open June through Sept: Tuesdays, Thursdays, Fridays, and Saturdays from 10 AM to 3 PM
Open Oct through May: Tuesdays, Thursdays, and Saturdays from 10 AM to 3 PM
Phone: [REDACTED]

From: [Cathie Blanchard](#)
To: [Recycle BC Consultation](#)
Cc: [Cathie Blanchard](#)
Subject: Recycle BC program plan improvement
Date: Thursday, December 29, 2022 3:55:26 PM
Attachments: [image.png](#)
[image.png](#)

CAUTION: This email originated from outside of the organization.

To whom it may concern

Please find below some points I would like to make and some thoughts that might be worthy of your consideration in the Recycle BC plan.

Weight vs Volume: The claim that 94% of packaging and paper is recovered through Recycle BC program is misleading. Landfills fill up by volume, not weight and 72% of flexible plastic is not being recovered, and flexible plastic carries minimal weight.

$$\frac{214,273 - \text{Collected Quantity in 2021 (tonnes)}}{227,603 - \text{Supplied Quantity in 2019 (tonnes)}} = 94.7\% \text{ 2021 Program Recovery Rate}$$

Material Category		2017	2018	2019	2020	2021	2022
<u>Paper</u>	Recovery Rate	87%	86%	83%	90%	101%	
	Target	n/a	90% by 2022				
Plastic	Recovery Rate	41%	42%	46%	52%	55%	
	Target	n/a	50% by 2025				58% by 2025
Rigid Plastic	Recovery Rate	50%	54%	56%	64%	67%	
	Target	n/a	55% by 2022				73% by 2023
Flexible Plastic	Recovery Rate	20%	19%	22%	24%	28%	
	Target	n/a	22% by 2022				27% by 2023
<u>Metal</u>	Recovery Rate	66%	67%	73%	85%	83%	
	Target	n/a	67% by 2020				81% by 2022
<u>Glass</u>	Recovery Rate	72%	78%	87%	97%	116%	
	Target	n/a	75% by 2020				98% by 2022

The heaviest objects are at highest percentages of recovery; flexible plastic is at 28%. If you are collecting 116% of glass, you are including objects not accounted for by the producer in the first place, aren't you? That calls into question the validity of the entire table, doesn't it? And, what about transportation costs of heavier objects?

Establish Packaging Standards to Allow for Proper Sorting: Recycle BC needs to make a greater investment in requiring producers to stop using hard-to-recycle products in their packaging. No one is taking **responsibility** for plastic through the Extended Producer **Responsibility**. I suspect producers who use difficult-to-recycle plastic just pay money to keep Recycle BC perpetuating the myth, and raise their prices to cover their cost. What is the incentive for producers to improve packaging through this plan?

Contamination: Recycle BC must keep the recycling stream uncontaminated and that means

to communicate to consumers what should be in the multi-unit residential building (MURB) and Institution, Commercial and Industrial (ICI) recycling and what shouldn't. In a MURB, I could check the bin every day and find unqualified plastics in the recycling stream bins. If only PET has a market, then require producers to only package in PET, and require consumers to only recycle PET. If the plastic from a toothbrush package is going to end up at the landfill, after being transported to the MRF and end market, why don't you tell us to put it in the trash in the first place? In my building, we believe our paper and recycling either goes to the landfill or is shipped to another country.

- Maybe, anonymous deposits, not complexity, are the problem. Could each unit have its own blue box, to deposit weekly in an assigned location in a large rack. If they are doing it incorrectly, leave a note.
- Maybe every MURB must have a stewardship program to educate the residents.
- Maybe the producers in BC should be required to identify, on the package, the proper disposal of each component of its packaging. I noticed an Amazon bag has "Made with 50% recycled content, how2recycle.info, store drop-off, and remove paper label before recycling" on it. I appreciate knowing the recycled content and know just what to do with that bag.
- Can paper labels be required to be the same plastic composition as the bag?

End Markets: With a plan target of 85-90% of recycling to be shipped to end markets, it would appear Recycle BC is doing a terrific job. In 2021, 197,745 tonnes of Recycle BC's materials were shipped to recycling end markets while 229,922 tonnes were collected (86.0% of collected tonnes were sent to recycling end markets). What is an end market? Someone who turns it into something else?, Or, a third party who then ships contaminated loads of paper/plastic to Malaysia (evidenced in [youtube videos](#)) and India? Shipping our waste elsewhere is a shameful practice. The plan should include the how and when Recycle BC intends to move the needle on plastic trash. Recovery counts cannot consist of plastic entering a materials recovery facility and then ending up at the landfill after a brief stop at Merlin Plastics or being shipped out of BC. The plan should address the errors of the past and how Recycle BC is doing the right thing now. Can't the plan share how the recovered material is being used...really used, not potential use.

Refundables: When I purchase a juice, I use a variety of factors to determine the product I select. One of the factors should be sustainable packaging. A goal of Recycle BC's plan should be to require producers to use the best recycling option for deposit packaging. The advantage and recycling potential of the package should be clearly stated on the package. The CRF should be posted along with the shelf price. I understand the logic of varying market outlets and prices dictating the cost for end of life, but I want to decide which product to buy at the shelf, because it is too late once I get to checkout and see what the CRF is.

EPR: Adding products to the EPR deposit scheme, like the milk containers, should be better explained for full transparency to the public. A milk container used to go in the blue bin where we assumed it was being melted down and reformed into something else. Apparently, that was a costly endeavor because the EPR program chose to remove them from the blue box stream, apply a deposit and variable CRF, hoping very few show up at the Bottle Depot. Milk containers are very bulky, so most people will not salvage the one jug a week from the blue box to return for .10. They might for a dollar, but then Recycle BC would have to increase the CRF. I would like Recycle BC to include in their plan the establishment of zero waste stores where the consumer can have control over packaging and ultimate cost to the planet.

Collectors: Does Recycle BC have any authority over private waste collectors, those not choosing to partner with Recycle BC? Where do their collections of recycling go? Are their collections included in Recycle BCs target achievements?

In all things, unless there is something to hide, greater transparency would give BC citizens greater faith in the process and pride in the outcome.

Sincerely,
Cathie Blanchard

From: Jane [REDACTED]
Sent: December 16, 2022 9:43 AM
To: Recycle BC Consultation
Subject: updated Packaging and Paper Recycling Plan

CAUTION: This email originated from outside of the organization.

Please ensure that your plan accomplishes the following:

Reduces the volume of packaging and paper that enters the recycling stream by:

- reducing the volume that gets produced and used in the first place
- banning all single use products (with a small number of fully justifiable exceptions, situations in which it is not safe or not possible to use anything but a single use item. There are extremely few such situations.)
- making producers responsible for all the costs of any packaging they produce/use throughout the full life cycle of the packaging, including the cost of recycling it.
- setting high mandatory targets for reduction and re-use with a clear set of actions to achieve them and clear sources of funding in place to achieve them (some of that funding would be from the businesses themselves)
- providing public education about reduction and re-use that clearly states its advantages over recycling. Do this in schools, rec programs, provincial govt advertising etc.
- makes it legal for people to bring their own containers and use them in grocery stores, coffee shops, take-out restaurants etc. and illegal for single use items to be provided by such places.
- Encourages and ensures the development of such things as centralized dish providing and dish washing so that small restaurants and takeout places that currently use single-use dishes and cutlery (whether compostable or recyclable or not) can rent offsite dishes and dishwashing service and transportation of the dirty and clean dishes can be done to and from the restaurants. (The Vancouver Folk Festival has been doing this for decades. The rest of the world can too.)
- Placing the costs on the shoulders of the producers of the packaging and the producers of goods using the packaging so that they have full incentive to reduce packaging volume and produce/use multi-use packaging and so that communities and the environment do not continue to bear the burden
- Set fees to drive down the use of plastic

Increases the per cent of the remaining packaging and paper in need of recycling that actually gets recycled by:

- ensuring recycling programs in all communities everywhere in BC no matter how remote or whether on federal land (First Nations reserves)
- making it mandatory that all entities that provide or should provide garbage receptacles (eg. all businesses, all types of governments operating in BC, all institutions...) also provide composting and recycling receptacles along side them
- public education and in school education initiated by govt that educates about circular economies and recycling being important but only a small piece of the puzzle

Thank you.

From: Jennie Milligan [REDACTED]
Sent: December 26, 2022 11:32 AM
To: Recycle BC Consultation
Subject: Program Plan

CAUTION: This email originated from outside of the organization.

Hello,

I understand that Recycle BC is updating its program plan. Please accept my comments as follows.

The program should set high targets for reduction and reuse, not just recycling. The program should include a plan to provide comprehensive services to all communities in BC, from rural to Indigenous to multifamily buildings. The program should pay the full costs of providing these services and not download them to communities and the environment. Fees should be set to drive a decrease in plastic use.

Thank you,
Jennie Milligan
Vancouver, BC

From: J Brook <[REDACTED]>
Sent: December 19, 2022 10:24 AM
To: Recycle BC Consultation
Subject: Recycle BC - renewal of Program Plan

Importance: High

CAUTION: This email originated from outside of the organization.

Hi

As Recycle BC renews its Program Plan and works through the process of its every 5-year cycle of renewal, you are also taking comments from the public, mine are below:

I have been an ardent recycler for many years, even prior to home pickup.

Please consider these points - I particularly feel we are often lacking in service to multi-family buildings.

- The program needs to set high targets for **reduction and reuse**, develop actions to achieve them and provide funding.
- The program must have a plan to provide comprehensive service to **all communities** in BC who request it, including First Nation and rural communities. The program must provide service to all multifamily buildings.
- The program should **pay the full costs** of providing these services and not continue to download them to communities and the environment.
- Fees need to be set to drive a **decrease in plastic** use.

Thank you
Judith Brook
North Vancouver resident

consultation@recyclebc.ca

"My dancing soul doth celebrate"
– Richard II

From: Lynn Taylor [REDACTED]
Sent: December 16, 2022 12:09 PM
To: Recycle BC Consultation
Subject: Recycling program

CAUTION: This email originated from outside of the organization.

- The program needs to set high targets for **reduction and reuse**, develop actions to achieve them and provide funding.
- The program must have a plan to provide comprehensive service to **all communities** in BC who request it, including First Nation and rural communities. The program must provide service to all multifamily buildings.
- The program should **pay the full costs** of providing these services and not continue to download them to communities and the environment.
- Fees need to be set to drive a **decrease in plastic** use.

From: [Mary Forbes](#)
To: [Recycle BC Consultation](#)
Subject: Recycle BC feedback
Date: Wednesday, December 21, 2022 11:59:00 AM

CAUTION: This email originated from outside of the organization.

Thank you Recycle BC for providing a feedback opportunity on the new changes proposed to the BC programs.

I am an environmental educator to Indigenous, rural and remote BC communities and I can speak directly from experience and on the ground interactions with these valuable populations.

We can all acknowledge the last few years have been "very challenging to the Recycle BC program", as listed in your opening statement, as an organization you are feeling the strain, this strain is exponential for Indigenous, remote and rural communities.

Severe weather events strain on food and transportation systems (and their packaging) and labour markets are keenly experienced in our remote areas.

Our communities rely on the Recycle BC program, not only for the environmental impact of accountable diversion and fair access for all customers to this program, but also economic inputs, especially those population numbers that are below 1000, or 40kms from a centre of 10,000(appendix c).

These locations are worthy in the face of the same challenges being experienced by Recycle BC as an organization, cutting their service will only increase "public distrust in how plastics are recycled, driven by misleading media stories that fail to explain the differences between BC's residential recycling system and its associated controls compared to other jurisdictions, threaten to undermine BC's achievements." Cutting access for these communities will not result in positive headlines for Recycle BC.

Here are some headlines to improve your position;
"Recycle BC replies with stronger education, and is the informed voice for media" "Recycle BC will not waiver for BC residents right to reduce their waste".
"Recycle BC will adapt and innovate, not reduce service during a climate crisis."

Please consider your actions as they relate to the UN 17 Sustainable Goals and UN Declaration on the Rights of Indigenous People and your ground breaking work and relationship with IZW TAG.

As the launch educator in many of these communities I can state with authority that should the new proposed changes proposed in Appendix C are implemented tens of thousands of community members and their hard work will be alienated.

The year round grocery store requirement in Appendix C is biased to urban landscapes. Living remotely means large quantity and bulk purchasing especially with rising costs of living and fuel costs, this applies to residents and rural grocery store owners/operators alike.

Back hauling packaging to recycle it is a cost benefit for the Recycle BC program but should not exclude communities from participating, especially with the investment of cube truck recycling depots established in many indigenous communities with funding and support from ISC. (partnership opportunity!)

On the topic of back hauling, Recycle BC could increase oversight on independent depot operators who are charging escalating dropcosts to First Nations for bringing their high quality sorted products to their locations. I highly recommend financial audits to hold these businesses accountable and thoroughly investigate back hauling road blocks to competitive business opportunities. (Eg. Hazelton area Nations and Stumainus FN).

Addressing increasing cost burdens on behalf of the program's producer members should not remain a primary goal of the program. If the cost of the choice in packaging of producers is increasing, the financial motivation to innovate should be for producers to solve not residents burden. "Increased public attention on plastics, packaging design and the circular economy, Recycle BC will continue to leverage its position to further its producer members' plastics recycling objectives under BC Ministry regulation".

We the Indigenous, remote and rural populations of BC are creative, innovative and quick to adapt given the opportunity. Already conversations and networks exist in our province notably the Coast Waste Management Association rural round tables and many others.

Please bring us and our considerable experience resources into the conversation to move forward together.

Sincerely yours,
Mary Forbes (she/her)

Ps. I would like to suggest when seeking stakeholder feedback include your contact information. Contact information for feedback was not to be found on your coversheet or in the document body. I recieved your contact email from BCZW. Furthermore, requesting feedback deadlines over the winter holidays or summer break is exclusive for busy overburdened rural places, to be truly accountable make the feedback process accessible for the audience not for the author.

From: burns [REDACTED]
Sent: December 16, 2022 9:26 AM
To: Recycle BC Consultation
Subject: Recycle BC - Comments on proposed Recycling Regulations

CAUTION: This email originated from outside of the organization.

Recycle BC - Comments on proposed Recycling Regulations

- So much of the recycling is plastic. The new regs need to drive down the use of plastic
- To be truly ecological those who create and use products must be responsible for the full ecological cost which means the environment should not suffer further and municipalities should not be burdened with any costs associated with recycling

These concerns need to be better addressed in the proposed Recycling Regulations.

Susan Burns
[REDACTED]
Vancouver, BC [REDACTED]
[REDACTED]

From: susan gage [REDACTED]
Sent: December 16, 2022 10:23 AM
To: Recycle BC Consultation
Subject: Comments on the Zero Waste BC Plan

CAUTION: This email originated from outside of the organization.

Hello Recycling Consultants,
My family has been recycling for decades. I'm glad to see the program is being strengthened, and have the following suggestions:

- Food producers need clear rules that they **MUST** make their packaging recyclable, and that information must be clearly stated on the packaging. I'm tired of finding foil/paper packages that are unclear about whether or not they can be recycled.
- In many BC municipalities, stores have stopped giving out free plastic bags, and must charge for large paper carrying bags. This is a good strategy, and should be encouraged in all communities. But what about produce bags? These are a main source of plastic use. I think grocery stores should be encouraged to charge for produce bags, and that would get people bringing their own reusable produce bags. In fact, the recycling program should add fees to all plastic use.
- The program must provide comprehensive service to all communities in BC who request it, including First Nation and rural communities.
- The program must provide service to all multifamily buildings. I find it amazing that in Victoria buildings such as condo buildings and church buildings, etc., aren't covered by public recycling pick-up.
- The program should pay the full costs of providing these services and not continue to download them to communities and the environment.

Thanks for inviting input to this important program.

Susan Gage
[REDACTED]

Victoria, BC [REDACTED]