

# Packaging and Paper Product Extended Producer Responsibility Plan

Revised June, 2019

Recycle BC's first 5-year stewardship plan can be found at [https://recyclebc.ca/stewards/regulation\\_and\\_stewardship\\_plan/](https://recyclebc.ca/stewards/regulation_and_stewardship_plan/)



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# Packaging and Paper Product Extended Producer Responsibility Plan

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# Packaging and Paper Product Extended Producer Responsibility Plan

## 1. Revised Program Plan<sup>1</sup> Context

The Recycle BC stewardship program for residential packaging and paper product (PPP)<sup>2</sup> is unique in Canada. It is the first implementation of extended producer responsibility<sup>3</sup> whereby producers are operationally responsible for establishing a reverse supply chain for the collection, transportation, consolidation, processing and marketing of residential PPP.

Operated on behalf of producers by Recycle BC since May 2014, this reverse supply chain has transformed the collection and recycling of residential PPP from a municipally-based activity into an integrated provincial recycling system. In 2017, Recycle BC recovered approximately 175,000 tonnes of its members' PPP from 3.475 million residents, the majority of which was efficiently sold to end-markets for use in the manufacturing of new products and packaging.

This nascent circular economy for PPP has delivered markedly improved environmental outcomes. Larger quantities of PPP are collected with lower rates of contamination. The material is subsequently managed in an operationally efficient post collection management system that employs state-of-the-art container handling practices and downstream processing technologies for plastics.

The program's focus on working with municipalities and post-collection service providers to build an integrated provincial PPP reverse supply chain has also allowed for effective management of risk. While not immune to global market forces, overall Recycle BC has been able to weather the January 1, 2018 closure of China's secondary plastics and fiber commodity markets<sup>4</sup> while many other Canadian recycling programs continue to struggle to find markets for their collected fiber and mixed plastics.

The closure of Chinese commodity markets (especially those for secondary plastics), also known as the China Ban, has served to highlight a plastics crisis that has now come to the forefront of the global consciousness on the environment. It is a crisis that has arisen from: the increasing use of plastics for packaging and single-use products; low global plastics collection and recycling rates; high rates of discharge of those plastics to the environment<sup>5,6</sup> (especially the marine environment); and the reliance on developing nation export markets for mixed plastics collected by recycling programs in developed nations.

In the context of this growing consciousness, a number of producers subscribing to the Recycle BC PPP program have made global commitments to undertake measures to increase and improve plastics

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<sup>1</sup> Section 6 of the Recycling Regulation requires that every five years a producer must review its approved plan and submit proposed amendments to the Province of BC for review and approval, or in the case where no amendments to the plan are necessary, the Province of BC should be so advised. In 2017, having been in operation for three full years, Recycle BC conducted a thorough review of its performance to inform the design of a revised plan that would govern its future operations. This plan will replace the original Packaging and Printed Paper Stewardship Plan submitted by Multi-Material BC (now Recycle BC) and approved in April 2013.

<sup>2</sup> For a full definition of packaging and paper product see section 3.1 and 3.2 in this document.

<sup>3</sup> The British Columbia (BC) Recycling Regulation (B.C. Reg. 449/2004 – the "Regulation") under the *Environmental Management Act* requires that, effective May 2014, every producer of PPP that wishes to sell, offer for sale or distribute their products to residents in British Columbia must operate, or be a member of, an approved plan concerning the end-of-life management of their products.

<sup>4</sup> See: [Plastics Pile Up as China Refuses to Take the West's Recycling](#)

<sup>5</sup> Approximately 8.3 billion tonnes of virgin plastics have been produced to date. As of 2015, approximately 6.3 billion tonnes of plastic waste had been generated, around 9% of which had been recycled, 12% incinerated, and 79% disposed of in landfills or the environment. Roland Geyer, R., Jambeck, J.R., and Law, K.L. (2017) Production, Use, and Fate of All Plastics Ever Made, *Science Advances* 19 Jul 2017: Vol. 3, no. 7

<sup>6</sup> If current production and waste management trends continue, roughly 12 billion tonnes of plastic waste will be landfilled or discharged to the environment by 2050. Ibid. Ref.5

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recycling.<sup>7</sup>

Concurrently, in its role as president of the G7, Canada has championed the development of a G7 “Plastics Charter”.<sup>8</sup> Ratified in June 2018, the Charter sets forth a number of objectives and aspirations for improving the collection and management of plastics and the development of plastics secondary materials markets.

In preparing this revised Program Plan, Recycle BC recognizes that its extended producer responsibility (EPR) program for PPP (along with the Schedule 1 EPR program for beverage containers) is both a mechanism for furthering its member producers’ plastics recycling objectives as well as a key policy approach for meeting Canada’s commitments on plastics.

Guided by the fundamental requirements of the BC Recycling Regulation, these emerging corporate and public policy agendas regarding plastics have been given careful consideration in developing this plan, which will define the next five years of Recycle BC’s operations.

In this context, this plan lays out Recycle BC’s renewed vision that will use its logistical and operational base established in the last four years to focus on the following:

- Expand collection of PPP;
- Ensure continued reduction in contamination rates;
- Drive innovation for recycling difficult-to-recycle materials; and critically,
- 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).

Note that this Plan has been revised to include Appendix F, the June 28, 2019 letter from the MoECCS, as referenced in the Table of Contents.

## 2. The Extended Producer Responsibility (EPR) Agency

As discussed above Recycle BC operates a residential PPP reverse supply chain throughout British Columbia on behalf of businesses that supply packaging and paper product to BC residents.

Recycle BC is a not-for-profit organization that aims to be a trusted environmental advocate and community partner offering equitable, effective and efficient residential recycling services. Its supply chain is comprised of partnerships with local governments, First Nations, private companies and other not-for-profit organizations.

Based in North Vancouver and staffed with local employees, Recycle BC manages its program operations and is supported in its work by Canadian Stewardship Services Alliance (CSSA), a national, not-for-profit organization dedicated to providing support services to stewardship programs across Canada. Recycle BC is governed by a Board of Directors representing brand owners and retailers. The current composition of the Board of Directors can be found on Recycle BC’s website, [here](#). Recycle BC also consults with an Advisory Committee on core elements of its program. The Advisory Committee includes representatives from

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<sup>7</sup> As an example on April 26, 2018 [42 companies in collaboration with the UK WRAP](#) announced the voluntary [UK Plastics Pact](#) which makes a number of pledges to reducing plastic waste between now and 2025:

- 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.

<sup>8</sup> <https://g7.gc.ca/en/official-documents/charlevoix-blueprint-healthy-oceans-seas-resilient-coastal-communities/>

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stakeholders interested in the success of the program, including local governments, waste management industry associations, steward industry associations, and the Recycling Council of BC. The Advisory Committee's membership can be found on Recycle BC's website, [here](#).

Recycle BC acts on behalf of its member businesses who are producers of PPP. For the purposes of the Program Plan, the producer for a specific unit of packaging or paper product is the supplier of service packaging or the first of the following: brand owner, the franchisor or the first seller (also known as the first importer).<sup>9</sup>

### 3. Packaging and Paper Product

#### 3.1 Packaging

British Columbia's *Environmental Management Act* defines packaging as "a material, substance or object that is used to protect, contain or transport a commodity or product, or attached to a commodity or product or its container for the purpose of marketing or communicating information about the commodity or product".

Schedule 5 does not further refine the definition of packaging beyond that provided in the *Environmental Management Act* as described above.

Packaging for purposes of producer obligation and reporting under the Program Plan includes:

- (a) Primary packaging, i.e., packaging that contains the product at the point of sale to the residential consumer;
- (b) Grouped packaging or secondary packaging that goes to the household<sup>10</sup>;
- (c) Transportation, distribution or tertiary packaging that goes to the household<sup>11</sup>;
- (d) Service packaging designed and intended to be filled at the point of sale and "disposable" items sold, filled or designed and intended to be filled at the point of sale such as:
  - Paper or plastic carry-out bags provided at checkout;
  - Bags filled at the shelves with bulk goods, produce, baked goods, etc.;
  - Disposable plates and cups;
  - Take-out and home delivery food service packaging such as pizza boxes, cups, bags, folded cartons, wraps, trays, etc.;
  - Flower box/wrap;
  - Food wraps provided by the grocer for meats, fish, cheese, etc.;
  - Prescription bottles filled and provided by pharmacists;
  - Gift wrapping/tissue paper added by the retailer; and
- (e) Packaging components and ancillary elements integrated into packaging, including ancillary elements directly hung or attached to a product and which perform a packaging function unless they are an integral part of the product and all elements are intended to be consumed or

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<sup>9</sup> For a full definition of "producer" for the purposes of obligation and reporting, see Appendix D.

<sup>10</sup> Multiple packages of product sold in a unit, often wrapped in film plastic.

<sup>11</sup> May be both the primary packaging for the product and the packaged used to ship the product but is referred to as transportation packaging that goes home with the consumer. For example, household products packaged in corrugated boxes intended for final use or management by the consumer or end user.

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disposed of together.<sup>12</sup>

For the purposes of the Program Plan, paper packaging means all paper materials regardless of the cellulosic fibre source of the material including but not limited to wood, wheat, rice, cotton, bananas, eucalyptus, bamboo, hemp, and sugar cane (bagasse) fibre sources.

The plan does not apply to items obligated under other EPR programs, non-PPP items or PPP items supplied to industrial, commercial or institutional facilities.

### 3.2 Paper Product

In November, 2017 the government amended Schedule 5 of the BC Recycling Regulation to expand the Paper Product Category from printed paper to paper products<sup>13</sup>. Paper product is now defined as paper of any description, including:

- (a) flyers,
- (b) brochures,
- (c) booklets,
- (d) catalogues,
- (e) telephone directories,
- (f) newspapers,
- (g) magazines,
- (h) paper fibre, and
- (i) paper used for copying, writing or any other general use.

This definition of paper does not include paper products that, by virtue of their anticipated use, could become unsafe or unsanitary to recycle, or any type of bound book not mentioned above.

For the purposes of the Program Plan, paper product comprises any type of cellulosic fibre source including, but not limited to wood, wheat, rice, cotton, bananas, eucalyptus, bamboo, hemp, and sugar cane (bagasse) fibre sources.

### 3.3 Sources of Packaging and Paper Product

Under Schedule 5 of the Recycling Regulation, the packaging and paper product program addresses residential premises and municipal property that is not industrial, commercial or institutional property.

Residential premises are:<sup>14</sup>

- Single-family dwellings inhabited year-round or seasonally;<sup>15</sup> and

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<sup>12</sup> Examples of this kind of packaging include, but are not limited to: labels and lids hung directly on or attached to the packaging; mascara brush which forms part of the container lid; staples, pins, clips; toy on the top of a candy product which forms part of the lid; devices for measuring dosage that form part of the detergent container lid; plastic make-up case; brush contained in the lid of corrective liquid paper; zipper on a plastic film bag containing a product.

<sup>13</sup> The term packaging and printed paper has been amended to packaging and paper product based on changes to the regulation.

<sup>14</sup> Section 1 of the Recycling Regulation defines "residential premises" to include houses, apartments, condominiums, town homes and other premises in which persons reside but does not include institutional accommodations or visitor accommodations.

<sup>15</sup> Vacation facilities, such as hotels, motels, cottages and cabins, are considered commercial operations.

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- Multi-family dwellings including rental, co-operative, fractional ownership, time-share, condominium<sup>16</sup> and seniors residences.<sup>17</sup>

Municipal property that is not industrial, commercial or institutional property comprises the following which are collectively referred to as ‘streetscape’ in this Program Plan:

- Sidewalks that are municipal property, which adjoin buildings in an urban commercial area and which are used for pedestrian traffic;
- Plazas or town squares that are municipal property and that are available to the public; and
- Parks that are municipal property.

## 4. Program Design

### 4.1 Packaging and Paper Product Program Delivery Principles

Recycle BC’s program design was driven by one overarching objective – continuous improvement in recovery effectiveness and efficiency in British Columbia.

Upon review, it is clear that the market engagement principles that guided the development and operation of the first iteration of the Recycle BC’s program have served it well. As such, they will continue to guide the program’s future operation:

- **Focus on outcomes, not process** – maximize recovery, maximize efficiency, enhance resident service levels while minimizing complexity;
- **Provide economic incentives and set simple rules** – effective economic incentives will drive behaviour that increases recovery activity throughout the PPP reverse supply-chain; simple rules will provide clarity and certainty to those collecting and recycling PPP;
- **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; and
- **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.

### 4.2 Packaging and Paper Product Program Delivery Overview

Under the Recycling Regulation, Recycle BC assumed responsibility for establishing a province-wide reverse supply chain for PPP in BC, effectively supplanting the role that local governments historically played. This supply chain is comprised of a collection system and a post-collection system that involves the receipt of collected PPP and its consolidation, transfer and transport, processing and delivery to end markets.

With respect to collection services to BC residents, Recycle BC provides a financial incentive to local governments, First Nations and private collectors that have chosen to deliver recycling collection services

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<sup>16</sup> Vacation facilities, such as rental, co-operative, fractional ownership, time-share or condominium accommodation associated with sports and leisure facilities (e.g., ski resorts), are considered commercial operations.

<sup>17</sup> Residences at which medical care is provided, such as nursing homes, long-term care facilities and hospices, are considered institutions.



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and resident education under contract. In other cases, communities have elected to have Recycle BC directly manage their curbside recycling service. These local governments are no longer responsible for oversight or management of recycling services or resident communication regarding curbside recycling. In both cases, Recycle BC assumes financial responsibility for all collection and post-collection activities.

Recycle BC procured a post-collection system through a competitive process, resulting in an efficient, province-wide, PPP transfer and sorting system to maximize the value and re-use of the recyclables and minimize redundancy.

Recycle BC regularly reviews both its collection and post-collection operations to identify opportunities to increase efficiency.

### **4.3 Collection of Packaging and Paper Product from Residents and Streetscapes**

Recycle BC's approach to delivery of PPP collection services is to contract with collection service providers that meet Recycle BC's collection qualification standards. These standards are designed to assist Recycle BC in achieving its program targets and commitments. Recycle BC has established a set of collector qualification standards that include basic qualifications historically common to all PPP collectors, with additional requirements that enable tracking and reporting of sources and quantities of PPP. Local governments, First Nations, private companies and not-for-profit organizations that meet collector qualification standards are eligible to serve as Recycle BC collectors, subject to the approach described below.

Consistent with an outcomes-based approach to program operations, Recycle BC offers financial incentives to qualified collectors. These incentives are designed to provide collectors with sufficient incentive to collect the amount of PPP required by Recycle BC to meet its targets.

#### **4.3.1 *Process for establishing financial incentives for collection***

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 an analysis 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.

#### **4.3.2 *Methodology to prepare revised financial incentives***

Recycle BC's objective is to set fair and reasonable incentives. To determine whether any fundamental changes are needed to the existing incentives Recycle BC:

- Reviews the past 3 - 5 years of program data, including collection performance by collection channel;
- Reviews contamination levels and their impact on total supply chain costs;
- Analyzes channel-specific collection costs in the current market context. Specifically, Recycle BC undertakes a cost study to determine current collection costs and compare current costs to historical costs over a five year period. Data for curbside, multi-family and depot collection costs are provided by collectors to an independent third-party accountant. Promotion and education (P&E) and service administration are also included in the study to determine a fair commercial

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price for the necessary collection costs. [A summary report of the cost study is published on Recycle BC's website.](#)

- The cost study will be overseen by the Recycle BC Advisory Committee. The next cost study will be conducted in 2020. The detailed timeframe is:
  - Q2 2019 – review study scope to expand to a province-wide representative collector sample and invite all collectors to participate,
  - Q3 2019 – procure financial accountancy firm through a competitive process,
  - Q1 2020 – conduct study using 2019 collection cost data (reflects one full year of new financial incentive payments implemented November 30, 2018),
  - Q2 2020 – publish the study report on Recycle BC's website and consult (consultation includes a review of the study methodology and market cost findings),
  - Consultation Report prepared to provide a summary of stakeholder comments and how they were addressed, and posted to Recycle BC website,
  - Q3 2020 – prepare adjustments to financial incentive rates, if required as a result of the cost study, for inclusion in 2021 steward fees,
  - Q4 2020 – amend contract to reflect new fees payable to collectors, if needed, for January 1, 2021 effective date and publish on Recycle BC's website
- Assesses inflationary factors including a review of the BC Consumer Price Index;
- Reviews service performance requirement changes since the prior services agreements were established that may have had a financial impact on the collector.

The proposed financial incentive rate derived from the above process is presented for consultation to collectors. Specific feedback by the collector is essential to this process. Once new contract templates have been published inclusive of the revised financial incentives each collector must then decide whether or not to renew its collection contract with Recycle BC.

The current contract term for collectors expires December 31, 2023, and in 2022 Recycle BC will once again follow the methodology outlined in this Program Plan to prepare revised financial incentives.

### **4.3.3 Local Governments and Curbside Collection**

Recycle BC may deliver curbside collection to residents itself or, as is often the case, in partnership with local governments. Local governments choose whether to act as collection agents on behalf of Recycle BC but are not required to do so.

Should a local government decide not to accept Recycle BC's financial incentive, the local government can direct that Recycle BC deliver PPP curbside collection service to residents. Should the local government choose to transition service delivery to Recycle BC, the latter becomes responsible for directly delivering all aspects of the management of curbside collection services to residents. The criteria for Recycle BC to transition an existing curbside program to direct service are outlined in section 4.3.6 below.

Local governments can also elect to decline Recycle BC's offer to provide curbside service and can operate curbside collection service outside of the Recycle BC program.

Recycle BC's approach to contracting with collection service providers and providing them with financial incentive offers for PPP collection is explained in the following sections.

### **4.3.4 Existing Curbside Programs**

Curbside collection is defined as the collection of PPP from single-family dwellings, buildings with up to four households and row house complexes with any number of households where each household sets out material separately for collection by collection vehicles.

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All local governments that were operating PPP curbside collection programs as of May 2014 are eligible to join the Recycle BC program as contracted collectors. Recycle BC will continue to offer financial incentives to all eligible curbside programs to join the Recycle BC program if they have not already done so.

Recycle BC assesses the need to expand its collection system on an annual basis and takes commercially reasonable steps to meet recovery targets and accessibility performance objectives in the subsequent year, taking into consideration, without limitation:

- Collectors that have expressed an interest in joining Recycle BC's collection system and that are able to:
  - Deliver collection services in areas identified as having insufficient collection service to meet accessibility performance objectives, in accordance with Recycle BC's Collector Qualification Standards, and the terms of the Master Services Agreement and Statement of Work;
  - Contribute to Recycle BC's recovery target; and
  - Contribute to the efficiency and effectiveness of Recycle BC's collection system;
- The ability of Recycle BC to modify post-collection service provider agreements to add new collectors and more tonnes of PPP; and
- The timeline to execute agreements with collectors prior to finalizing Recycle BC's operating budget for the upcoming program year.

### **4.3.5 New Curbside Programs**

Local governments, in communities that did not have PPP curbside collection programs as of May 2014 when the program was first launched, are eligible to join the Recycle BC program as contracted collectors if they implement a PPP curbside collection program, provided each of the following criteria is met:

- A curbside garbage collection program was in place for a minimum of two years in advance of the new curbside program for the same households;
- The community represents an incorporated municipality;<sup>18</sup> and
- The community has a minimum population of 5,000 residents.

The timeline for the provision of formal offers to these communities is determined based on the same assessment as noted above and eligibility will be reviewed annually by Recycle BC for inclusion in the following year's budget as applicable.

In 2021, Recycle BC will assess the feasibility of servicing smaller, densely populated communities of less than 5,000 residents that are immediately adjacent to an existing curbside service area, with the same requirement for curbside garbage collection as above.

Once the unincorporated criteria has been determined, Recycle BC will post a companion document to the Program Plan on the Recycle BC website. Once the adjacency criteria has been determined, Recycle BC will amend this document to include this criteria. Changes to curbside accessibility will be reported in Recycle BC's annual report each year.

### **4.3.6 Transition to Provision of Curbside Service by Recycle BC**

Recycle BC operates curbside service directly in communities where the local government has transitioned

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<sup>18</sup> If the community is unincorporated, Recycle BC will in 2019 determine an equivalency definition for 5,000 residents who live in a densely populated locality where the only differentiation is the type of government. Recycle BC will then consult in Q4 2019 on this definition and revise the eligibility criteria by the close of 2019 for local governments with unincorporated communities that meet the other two criteria to join the Recycle BC program by provision of a formal offer Q1 2020 as applicable.

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service to Recycle BC. In these communities, Recycle BC is responsible for all aspects of the management of curbside collection services to residents.

Local governments with existing collection agreements with Recycle BC may, at their discretion, request that Recycle BC directly operate PPP curbside services in their communities, provided each of the following criteria is met:

- The request is made in writing and is accompanied by a formal resolution from the applicable Council or Board;
- A formal commitment is made, in writing, to provide Recycle BC with all reasonable assistance and cooperation during the transition period (e.g. provision of a complete address list, household data etc.);
- The request pertains to the entire service area and not a portion thereof;
- If applicable, the existing inventory of collection containers is provided to Recycle BC (or left in the possession of residents) at no cost, at the discretion of Recycle BC;
- The PPP curbside program had achieved a minimum capture rate of 90 kilograms of PPP per curbside household in the previous calendar year;
- A minimum of 18 months' notice is provided prior to the proposed transition date for provision of curbside services directly by Recycle BC; and
- The transition date falls on or after the original termination date of the applicable local government's curbside collection agreement.

Such requests will only be considered by Recycle BC during defined windows of time as communicated by Recycle BC to eligible collectors. For example, October 1, 2018 was the deadline for local governments with existing curbside collection agreements that expire at the end of 2018 to request that Recycle BC assume direct operation of their curbside services. Pending such request, the 18-month transition period would begin effective January 1, 2019 with the actual transition of service to Recycle BC taking place on July 1, 2020.

Recycle BC will be under no obligation to operate PPP curbside services directly in communities that do not meet the above criteria, including in locations where the applicable local government has requested to terminate their collection agreements prior to the original termination date.

### **4.3.7 Multi-family Collection**

Multi-family collection is defined as the collection of PPP from residential complexes with 5 or more units where all households deposit their recycling at a centralized location in shared containers.

Recycle BC delivers PPP multi-family building collection services by contracting with local governments and private companies that accept an established financial incentive to deliver multi-family building collection services.

Each year, Recycle BC will review multi-family household participation levels in relation to its annual recovery target and accessibility performance objectives and expand multi-family service to BC residents by extending financial incentive offers to qualified multi-family collectors each year.

In 2017, Recycle BC serviced 422,000 multi-family households in BC, increasing to 439,000 in 2018. The majority of multi-family households not currently serviced by Recycle BC are serviced by private waste management companies that typically offer a bundled service to the multi-family building that includes PPP, garbage, and often organics collection. As part of its program of continuous improvement, Recycle BC will identify communities without significant Recycle BC presence in multi-family recycling and offer an established financial incentive to deliver multi-family building collection services. (See Section 4.7 for

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details about planned targeted awareness campaigns to multi-family buildings.) However, it is the prerogative of private waste management companies to decline Recycle BC's offer to provide multi-family service and to continue to operate a multi-family collection service outside of the Recycle BC program. In order to meet Recycle BC's plastics targets it will need to be able to collect more material from multi-family buildings. Therefore, Recycle BC is naturally incented to achieve continuous improvement through these and other collection channels and will deploy targeted strategies to encourage multi-family properties to participate.

Please note that as Recycle BC on-boards communities with curbside PPP collection service, it will offer multi-family collection to qualified collectors for those service areas. Additionally, each year existing service contracts are expanded to include new multi-family households that appear in a service area as a result of natural population growth.

### 4.3.8 Depot Collection

Depot collection is defined as the collection of PPP at a location operated by a local government or private company under agreement with Recycle BC at which PPP is received from residents.

Under the Recycle BC program depot accessibility has expanded as follows:

- **Baseline coverage** was established in 2013 through services agreements offered to all qualified depot operators (local government, First Nations, private, not-for-profit) who indicated that they wished to join the Recycle BC program. In May 2014 these offers resulted in a depot collection base of 134 depots which resulted in 96% of the BC population being within a 30 minute (urban residents) and 45 minute (rural residents) drive time of a depot.
- **Expanded in-program coverage.** Recycle BC annually assesses the need to expand depot collection coverage in order to address under-serviced areas and to provide depot accessibility for packaging and paper materials that are not collected at curb side or through multi-family service (e.g. film and foam). Seventy-seven depots have been added since 2014, with the resulting expansion raising accessibility in 2017 to 98% of the BC populations now located within a 30 minute (urban residents) and 45-minute (rural residents)<sup>19</sup> drive time of a depot. Recycle BC has been actively on-boarding communities from 2017 through to 2019. Upon completion of this expansion phase, Recycle BC will conduct a province-wide depot accessibility assessment, in 2019, to determine the adequacy of depot coverage and proffer formal offers for collection services beginning in 2020. Timing for some offers may be dependent upon post-collection supporting infrastructure development, in addressing under-serviced areas. At a minimum, accessibility will be maintained at the current level of 98% and Recycle BC will strive to increase accessibility.

The drive-time-to-depot measurement establishes the depot coverage benchmark by which Recycle BC reports its depot accessibility performance. The following criteria will be considered when determining how depot coverage will be expanded:

- community size and seasonal population;

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<sup>19</sup> Urban is defined as Metro Vancouver (MV), Capital Regional District (CRD) and other census subdivisions with a population of > = 30000. Rural is defined as census subdivisions in two categories: i) cities, towns and districts with a population of 4000 – 29999 (outside of MV and CRD) and ii) other communities, both sparsely populated <4,000 and communities > 4,000 not captured above, as census subdivisions. <http://www12.statcan.gc.ca/census-recensement/2011/geo/bound-limit/bound-limit-2016-eng.cfm>

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- location of existing community services (e.g. a primary shopping hub) in order to ensure any incremental depot locations make a meaningful contribution to collection volumes and to convenience without duplication of transportation; and
- locations that would have minimal encroachment on collection volumes from existing depots.

Where incremental depot capacity is deemed desirable, Recycle BC will expand accessibility by:

- Providing existing depot operators with the option to establish satellite depots for selected smaller communities peripheral to their existing depots. 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; and
- Providing the opportunity to collect PPP in-store and transport it to a centralized distribution centre for pick-up by the designated post-collection service providers.
- Considering additional activities for increasing collection accessibility such as mobile depots and collection events.

Recycle BC annually assesses the need to expand collection coverage to increase accessibility. The provision of formal offers to communities is based on this annual review by Recycle BC for inclusion in the following year's budget as applicable within this Program Plan.

### **4.3.9 First Nations Recycling Initiative**

In 2017, Recycle BC founded the First Nations Recycling Initiative (FNRI). The initiative is a collaborative venture comprising nine BC stewardship agencies whose purpose is to support the collection and recycling of a wide variety of materials disposed by First Nations communities.

Lead by a First Nations representative whose primary role is outreach and liaison, Recycle BC has conducted the following activities under the auspices of the FNRI:

- Published a recycling guide for First Nations communities interested in starting recycling programs;
- Attended First Nations events and visited First Nations communities to assess current recycling activities and provide guidance; and
- Organized a pilot round-up event to assess the effectiveness of such events.

Each year the FNRI will establish goals and report outcomes for each participating stewardship organization's annual report.

In 2017, Recycle BC had 11 First Nations communities as collection partners with Service Agreements. Recycle BC also provides curbside and multi-family collection for 13 First Nations communities as part of other local government and direct service collection contracts, bringing the total number of participating First Nations communities to 24. In addition, many other First Nations communities have access to depots. Recycle BC will expand First Nations PPP recycling annually under the following initiatives:

- Provide a financial offer and services agreement to First Nations recycling programs each year that have developed the necessary recycling capacity in their community to fulfil the contract obligations, while working to maintain the continuity of the existing First Nations collection programs within its network;
- Continue to provide outreach and liaison for First Nations communities that have indicated they would like PPP collection, to build awareness and operational education on aspects such as material quality and contamination to assist in a transition to a recycling program;

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- Continue to review existing Recycle BC curbside and multi-family collectors' service areas to determine if they can include non-serviced First Nations communities in the same service area. If collection of a First Nations community can reasonably expand from adjacent curbside programs, Recycle BC will work with the municipal or direct service collector to increase their service area and amend their contract;
- Continue to work collaboratively with First Nations communities on collection pilot initiatives such as the depot pilot for bulk drop-offs and the mobile depot pilot with Indigenous Services Canada; and
- Participate in the First Nations Recycling Initiative to provide round-up event PPP collection accessibility for First Nations communities.

Each year Recycle BC will report First Nations access to collection services in its annual report.

### ***4.3.10 Streetscape Collection***

Recycle BC conducted three pilots to test the effective delivery of streetscape collection systems in each of the following years: 2014, 2015 and 2016-2017. In each of these pilots, Recycle BC undertook waste composition audits of PPP and garbage. A behavioural study was also conducted during three audit periods in 2016-2017 to better understand consumer preferences regarding the design of streetscape collection and to further inform the effective delivery of streetscape collection to pedestrians. Based on these study results, Recycle BC proposed a preferred approach for streetscape services as well as a financial incentive offer during its November 2017 consultations. Since that time, new challenges have emerged affecting streetscape collection.

#### ***The new challenge for streetscape collection and recycling services***

As Recycle BC's pilot studies demonstrated, PPP material can be collected but it is poorly sorted, heavily contaminated, wet with residual liquids, and unclean with food waste. Hazardous material can also be present. The processing and recovery of PPP from streetscape collection containers in the 2014-2017 pilots proved challenging due to the highly contaminated nature of this material; now, the increasingly strict marketing specifications imposed by changing market conditions such as the China Ban have exacerbated the impact of the contamination problem. As discussed in Section 1, the closure of Chinese commodity markets and the resultant inability to find end markets for low quality mixed material demands that Recycle BC drive down contamination in collected materials. With greater than 30% contamination, existing streetscape PPP collection practices may need to be revisited in their entirety.

#### ***Recycle BC's delivery of streetscape collection and recycling services***

Recycle BC will continue to perform further research through streetscape collection projects to determine alternate approaches to streetscape collection. Research and development will be conducted on the container type, bin signage and other design elements, utilizing accompanying composition audits, until a workable model for streetscape can be found. For example, in 2018 Recycle BC's continued streetscape research with the City of Vancouver by removing paper containers in park locations to determine if a better outcome for recycling occurs when fibre is collected in the organics stream. Additionally, a 2019 composition audit will determine if 2018 bin retrofits to address contamination have been successful.

Should streetscape produce a reasonable amount of recoverable PPP<sup>20</sup> and a suitable recycling model be successfully tested, Recycle BC will consult on the program's design and financial offering. To that end, in 2019, Recycle BC will bring together a round table of streetscape collectors for a series of meetings to plan and discuss a suitable recycling or recovery model and financial incentive offer for streetscape material. A

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<sup>20</sup> Subject to proof of concept through testing effective delivery of streetscape collection systems.

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report of this initiative and its findings will be published. The detailed timeframe is:

- Project scope and methodology reviewed Q1 2019, and a third-party facilitator retained for the round table working group;
- 31 local governments invited to participate; introductory webinar May 2019 to launch initiative;
- Series of six round table sessions from June – November 2019, covering topics such as current reality (case study reviews, streetscape survey findings, current collection systems), creative options development, measurement and evaluation, and financing; and
- Study report published and consultation held Q2 2020. Consultation to include review of round table findings, proposed streetscape design and financial offer to collectors.

Post-consultation, Recycle BC will provide a financial incentive offer and services agreement to local government collectors to service streetscape in areas where they operate litter collection systems (referred to as ‘streetscape collection service’) by end of 2020.<sup>21</sup> The service must meet Recycle BC’s reasonable access criteria, defined in Recycle BC’s 2013 Program Plan (Section 5.2 Accessibility, page 22) as urban commercial areas with business activities that generate large amounts of PPP within municipalities with a population of 20,000 or more and a population density of 200 or more people per square kilometre.

The financial incentive to the local government for the provision of services includes PPP collection and recycling services, public education, promotion and first point of contact for collection service customers.

### 4.4 Post-Collection

Recycle BC contracts directly for post-collection services which include the following activities: receiving PPP from collection vehicles, picking up PPP from depots, consolidation and transfer where required, handling and sorting PPP, preparing PPP for shipment to end-markets or downstream processors, marketing PPP to maximize commodity revenue, appropriately managing residual materials, reporting the quantities of material received and marketed, and other metrics to Recycle BC as required.

Primary processors are considered to be the first receivers of collected PPP that market at least some types of processed PPP directly to end-markets. Primary processors may engage subcontractors to provide consolidation, transfer, and transportation services to move PPP from the collection location to the processing facility. Primary processors may also engage secondary or downstream processors that can more efficiently or effectively sort, process, and market certain types of PPP.

The primary processor contract(s) is awarded based on an RFP process. Processors are considered to be qualified based on compliance with the processor qualification standards and evaluation criteria including but not limited to price, location, capability, capacity, output to recycling end-markets per tonne received, and material revenue received.

### 4.5 Collector and Processor Qualification Standards

Collector and processor qualification standards, including reporting protocols, are the minimum operating standards that a service provider must meet on a continuous basis in order to be eligible to provide collection, depot operation and/or processing services under a contract with Recycle BC.

Qualification standards are used by Recycle BC to support the continued growth of a safe, stable and sustainable PPP collection and processing system across British Columbia. Recycle BC incorporates qualification standards into the RFP for post-collection services and into contracts with collectors and processors.

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<sup>21</sup> The provision of a streetscape garbage collection service is critical to the operation of a streetscape PPP collection service.



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Qualification standards set out basic requirements, such as free collection service to residents, proof of all necessary licenses and permits, compliance with health and safety requirements and specified liability and business insurance coverage. Qualification standards also include reporting requirements to allow Recycle BC to meet its reporting requirements to the MoECCS. Collector and processor qualification standards can be found [here](#).

### 4.6 Dispute Resolution

Recycle BC seeks to balance the principles of access, efficiency, fairness and equitable outcomes in the design of its dispute resolution mechanisms. Dispute resolution processes are tailored to the nature of disputes as well as the likely parties to a typical dispute. The objectives of the dispute resolution process are to manage disputes to resolution rather than adjudication, earlier and faster and at a reduced cost to all parties involved.

The following suite of alternative dispute resolution processes is used:

Dispute Type	Path of Escalation/Resolution
Residents	<ul style="list-style-type: none"><li>• Discussion with Recycle BC management</li><li>• If unresolved, involvement of the Recycle BC Advisory Committee</li></ul>
Collectors and processors	<ul style="list-style-type: none"><li>• Discussion with Recycle BC senior management</li><li>• Facilitation: to prevent escalation and to explore interests/remedies</li><li>• Mediation: to be used if facilitation is unsuccessful. Process to be specified in commercial agreements regarding selection of mediator, roles of parties, time and place of mediation, conduct of mediation, length, responsibility for fees/costs, confidentiality, conclusion of mediation by agreed settlement or final settlement proposal by the mediator</li><li>• Arbitration: to be used if mediation is unsuccessful; process to be specified in commercial agreements regarding notice of arbitration, submission of written statements, place and conduct of meetings and hearings, the process for rendering and delivering decisions; jurisdiction and powers of the arbitrator, allocation of costs/fees; application of the B.C. Arbitration Act (RSBC 1996)</li></ul>

The dispute resolution process described above for collectors and processors is contained in Recycle BC's services agreement (Master Services Agreement, Section 14, Dispute Resolution).

For Dispute Resolution, please contact Recycle BC at [disputes@recyclebc.ca](mailto:disputes@recyclebc.ca).

### 4.7 Communications

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

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- 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.

To achieve the above objectives, Recycle BC employs the following strategies:

### **1. Awareness campaigns**

Recycle BC conducts targeted awareness campaigns independently or in partnership with stakeholders, such as other EPR agencies, producers, local governments, and community-based organizations.

### **2. Strategic partnerships**

Recycle BC partners with organizations with targeted local or provincial market penetration to broaden the reach and raise the profile and awareness of Recycle BC.

### **3. Brand management**

Recycle BC works with collectors and other stakeholders to maintain brand integrity (accuracy and consistency).

### **4. Collector resources**

Resources are made available to Recycle BC collectors to be used to help educate their residents on various aspects of the Recycle BC program. In many instances templates are available for customization.

### **5. Additional resident communication**

Recycle BC communicates directly with residents about various program elements including accepted and not-accepted materials, depot locations, collection schedules, contests, special projects, etc. using various channels.

### **6. Research**

Recycle BC regularly conducts quantitative research to gather accurate provincial information on recycling habits, service levels, and brand and program awareness.

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, using consumer research to determine where P&E efforts should be strategically deployed. For example, if research indicates that a particular demographic is not participating in the recycling program, a promotion and education campaign will be targeted towards that group.

One specific target for consumer awareness will be multi-family dwellings and their property management companies to advise of producer-funded recycling collection through the Recycle BC program. Specific timelines and activities are:

- Develop list of property management companies to target, Q4 2019;
- Develop an information package for awareness of producer funded services in Q1 2020 and begin outreach to building management;
- Develop targeted consumer awareness campaign for multi-family residents and deploy in 2020;
- Annually assess multi-family collection service gaps (see section 4.3.7) and refine outreach activity; and

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- Track and report progress on outreach activities in Recycle BC's annual report each year.

Similarly, if certain accepted materials have a lower than desired recovery rate, or a specific non-obligated material is consistently found in the recovered material, targeted campaigns will be conducted to improve performance. Over the next five years of its mandate Recycle BC will closely monitor program performance to strategically plan its annual consumer awareness and education campaigns and will seek opportunities to work with stakeholder partners to increase program performance. For example, in 2018 Recycle BC conducted a P&E campaign to encourage BC residents to use reusable bags and take their single-use bags to depots for recycling. Recycle BC also partnered with the Retail Council of Canada to develop a Resource Guide for BC retailers to reduce the use of single-use shopping bags.

In accordance with Section 8(2)(a) of the Recycling Regulation, Recycle BC will continue to report on its educational strategies and materials in the "Public Education" section of its annual report.

### **4.8 Administration of the Program Plan**

Recycle BC is responsible for administering this Program Plan on behalf of the producers that have chosen to be members of the Recycle BC Program.

Recycle BC's objective is to manage the Program Plan effectively and efficiently through a combination of in-house resources and outsourcing of key specialized functions or services.

Recycle BC directly administers collection and processing services including dispute resolution, communications to BC residents and performance reporting to the BC MoECCS.

Recycle BC outsources to Canadian Stewardship Services Alliance Inc. (CSSA) producer registration, reporting, fee invoicing, payments, audits and compliance in order to facilitate harmonized systems for Canadian producers, whether operating only in BC or in other Canadian provinces. Activities administered through out-sourcing include those that will not compromise the relationship between Recycle BC and BC stakeholders and where effectiveness and efficiency is enhanced by the best practices already incorporated by CSSA that would otherwise be a multi-year continuous improvement effort for Recycle BC.

### **4.9 Program Financing**

Recycle BC is responsible to the producers that have chosen to be its members to deliver an efficient and effective PPP EPR program.

Producers that choose to be members of Recycle BC are responsible for paying fees that are sufficient, in aggregate, to deliver the requirements and commitments of the Program Plan. Costs fall into three categories:

- Material management - what it takes to collect, transport, process and market materials. This is by far the largest cost component and is expressed net of commodity revenue in financial statements;
- Administration - what it takes to manage the business; and
- Resident awareness - what it takes to promote the behaviours that drive collection.

Producers that supply obligated PPP pay fees that are intended to cover:

- A contribution to the costs of managing the collection, consolidation, processing and marketing of the recyclable PPP that is the basis for the PPP EPR program performance;
- Where required, a contribution to advance the material's adoption in the recycling system, improve the cost efficiency to manage the material and/or to develop end-markets for the material;

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- An equitable share of resident awareness costs; and
- An equitable share of Recycle BC administration costs.

Costs incurred by Recycle BC to deliver and administer the Program Plan are allocated among producers based on the following principles:

- All obligated materials should bear a fair share of the costs to manage the packaging and paper product program, irrespective of whether a material is collected, because all obligated producers who put obligated materials into the marketplace should contribute to the recycling system;
- The material management costs allocated to each material should reflect the material's cost to collect and manage it in the recycling system because a material's unique characteristics can drive costs in distinctive ways; and
- The commodity revenue should be attributed only to the materials that earn revenue because materials that are marketed have value and should benefit from earned revenue.

To allocate the program costs in accordance with the principles above, Recycle BC conducts a number of studies that serve as inputs to fee setting, including waste composition and cost studies. The fee setting methodology then uses the inputs from these studies to calculate the portion of the program's budget that is attributed to each category of material supplied by producers.

As recycling systems change to accommodate new packaging formats that enter the marketplace (i.e. the "evolving-tonne") methodologies must be flexible enough to account for those changes and calibrate their cost effects. All methodologies undergo periodic review to verify their suitability and are updated in consultation with the producer community where required.

The fee setting methodology plays a critical role in ensuring Recycle BC has the tools necessary to raise funds in material categories where the material is difficult, if not impossible, to collect and recycle using today's recycling practices and technologies. A key component of the fee setting methodology is its mechanism for adding cost to uncollectable and/or underperforming material categories to enable the investment in performance improvement. These investments can be directed to research and development, end market development and/or promotion and education – all are necessary strategies to ensure materials advance upwards along the pollution prevention hierarchy.

## **5. Program Performance**

### **5.1 Managing Environmental Impacts**

Section 5(1)(c)(vii) of the Recycling Regulation requires that an EPR plan adequately provide for the elimination or reduction of the environmental impacts of a product throughout the product's life cycle.

Recycle BC works to reduce the environmental impact of producers' PPP by managing the collection and recycling of material. This involves partnering with communities on collection and overseeing the sale of processed material to select end markets. 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.

As discussed in Section 1, a number of Recycle BC member producers have made ambitious commitments to reduce their PPP footprint and are actively engaged in national and international discussions on

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initiatives to drive a circular economy.<sup>22</sup>

For example, the Canadian based Circular Economy Leadership Coalition is working in collaboration with the Ellen MacArthur Foundation and the Finnish Innovation Fund (Sitra) to engage Canadian businesses, NGOs, First Nations communities, and all three levels of government to:

1. Foster deep knowledge and understanding of the issues, barriers and benefits associated with eliminating plastic waste and transitioning to a circular economy
2. Support the development of a national vision, strategy, and action plan that focuses on bold but achievable solutions and opportunities for all levels of government, business, and civil society
3. Encourage and support the adoption and implementation of strategies, action plans and policies aimed at eliminating plastic waste and transitioning to a circular economy

As national and international efforts such as the CELC proceed, Recycle BC acts as both a recipient and participant in these forums.

At the same time, Recycle BC members continue to work independently and with their suppliers and processors to reduce the environmental impact of the packaging and paper product they distribute to BC consumers. Examples of this work include:

- Light weighting packaging to reduce material while maintaining packaging integrity;
- Simplifying packaging and paper product by removing unnecessary layers or components to improve recyclability;
- Utilizing lifecycle modeling tools in order to more fully understand the impact of their packaging throughout its lifecycle – encompassing both post-consumer management and carbon impact;
- Removing elements from packaging that might act as contaminants in the recycling stream such as utilizing new adhesives that are more compatible with the recycling process;
- Using 100% recyclable materials within a specified timeframe in order to support the market for recycled materials;
- Converting all packaging to recyclable materials within a defined timeframe; and
- Optimizing packaging in a way that reduces the carbon footprint over its lifetime.

All of these factors play a role in the way in which Recycle BC members innovate and build eco-efficiency into the packaging and paper products distributed to British Columbians.

While the majority of PPP diverted is collected in dedicated recycling systems, some local governments accept specific types of PPP such as soiled paper packaging in organic waste stream collection. In 2018, Recycle BC conducted research with five partner municipalities in BC to determine the amount of PPP being collected and managed in organic waste collection programs and the role that organic waste collection could have long-term in the overall post-collection management of PPP in British Columbia. The research demonstrates consistency in two meaningful ways:

- Of the PPP found in an organics bin, approximately 80% of this material is listed by the municipalities as acceptable material for putting in their green bin;

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<sup>22</sup> A circular economy is characterized by the closed loop flow of materials as either:\*

- Technical nutrients: The reuse of products and packaging or the recovery of the constituent materials in products and packaging for their reintroduction into manufacturing in a closed life-cycle<sup>22</sup> without loss of the utility of those materials; or,
- Biological nutrients: The consumption of constituent materials in products and packaging by biological systems with no adverse impact to those systems.

\*Towards the Circular Economy: Economic and Business Rationale for an Accelerated Transition 2013. Ellen MacArthur Foundation

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- Of the PPP found in an organics bin, 90-95% of this material is paper.

With these findings and other supporting evidence, a proper assessment of this issue necessitates a shift from a general view of compostable PPP to two distinct material categories: paper, compostable plastics. The study report is available [here](#).

With the increasing use of plastic packaging into compostable formats, Recycle BC will also undertake research to determine the extent to which the quantity of PPP in organic waste collection programs is actually composted (i.e. reduced to biological nutrients) at end-of-life (as opposed to being designated as contamination in commercial and municipal composting systems).

As more producers consider switching to compostable packaging formats, it is critical that national or North American standards for compostable plastics be developed to provide both packaging design guidance for producers and end-of-life management guidance to processing facility operators. Recycle BC will rely on the British Columbia Organic Matter Recycling Regulation policies and supporting research to better understand these emerging plastics and as appropriate, will support the development of national standards. In the interim, Recycle BC will provide information and resources to our stewards on the current situation associated with compostable packaging. Once standards are developed, Recycle BC also commits to communicating these standards to its stewards.

Based on the above studies, if the quantity of compostable PPP is significant, and Recycle BC is able to determine the quantity of PPP by material category recovered annually in organic waste collection programs (resource recovery to a beneficial use), Recycle BC will include the end-of-life disposition of this PPP in its Pollution Prevention Hierarchy report. Where these research efforts indicate both demand and technical feasibility, Recycle BC will develop financial incentives to promote the management of appropriate types of PPP (e.g. paper: soiled fiber and plastics: compostable bio-plastics) in the organic waste stream. The outcomes of this research can also serve to guide Recycle BC members' decisions to incorporate compostable material into the design of their packaging and paper formats.

### 5.2 Pollution Prevention Hierarchy

Section 5(1)(c)(viii) of the Recycling Regulation requires that an EPR plan adequately provide for the management of the product in adherence to the order of preference in the pollution prevention hierarchy.

The Program Plan adheres to the pollution prevention hierarchy through the following activities:

Pollution Prevention Hierarchy	Activity
Reduce the environmental impact of producing the product by eliminating toxic components and increasing energy and resource efficiency	<ul style="list-style-type: none"><li>• Initiatives undertaken by individual producers</li><li>• Program Plan encourages reduction by rewarding companies that reduce or eliminate the quantities of packaging supplied to market</li></ul>
Redesign the product to improve reusability or recyclability	<ul style="list-style-type: none"><li>• Initiatives undertaken by individual producers</li><li>• Program Plan encourages redesign through cost allocation that rewards easier-to-recycle materials</li></ul>

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Pollution Prevention Hierarchy	Activity
Eliminate or reduce the generation of unused portions of a product that is consumable	<ul style="list-style-type: none"> <li>Not applicable as packaging and paper product are not consumable</li> </ul>
Reuse the product	<ul style="list-style-type: none"> <li>Initiatives undertaken by individual producers</li> <li>Program Plan encourages reuse through cost allocation that presumes supplied materials only enter the marketplace once</li> </ul>
Recycle the product	<ul style="list-style-type: none"> <li>Program Plan utilizes payments to service providers to encourage collection of PPP and processing of PPP to meet recycling end-market requirements</li> <li>Upon request, Recycle BC provides guidance to producers on design for recyclability</li> </ul>
Recover <sup>23</sup> material from the product	<ul style="list-style-type: none"> <li>Primary and downstream processors are encouraged to further process system residues to meet recovery end-market requirements for engineered fuel products and minimize the amount of residue sent to landfill</li> <li>Research and development to explore ways to recover material that is currently non-recyclable (e.g. multi-laminated plastic packaging)<sup>24</sup></li> </ul>
Recover energy from the product	<ul style="list-style-type: none"> <li>Residential packaging and paper product collected by Recycle BC at curbside and depot is not currently sent to energy-from-waste facilities</li> </ul>
Otherwise dispose of the waste from the product in compliance with the Act	<ul style="list-style-type: none"> <li>Primary and downstream processors are required to manage residue in compliance with the Act</li> </ul>

When selecting end-markets for materials, Recycle BC gives priority to those located in countries that are members of the Organization for Economic Co-operation and Development (OECD). Recycle BC will allow marketing of processed PPP to packaging and paper end-markets located in countries that are not members of OECD only if the end-market meets or exceeds environmental, health and safety standards equivalent to OECD standards. Recycle BC commits to providing oversight to the recycling and recovery of PPP by visiting end-market destinations of the marketed materials over the lifespan of this Program Plan.

<sup>23</sup> In the context of the Pollution Prevention Hierarchy, Recycle BC uses the term “recovery” in two ways: 1) when a commodity is made by the processor for sale as engineered fuel and 2) energy recovery from waste (also known as “incineration”).

<sup>24</sup> For example, in 2018 Recycle BC launched a pilot project for flexible plastic packaging. Material is being collected by 115 depots which will be used to conduct processing trials with Recycle BC’s downstream plastics processors. The objective of the pilot study is to determine the most effective process to collect and sort this material. The pilot is being expanded to all depots in 2019.

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### 5.3 Performance Metrics

Recycle BC will report two levels of performance metrics:

1. **Program level performance** which is the recovery performance of the program for the aggregate of all PPP collected;
2. **Material category performance** which is the recovery performance for four separate material categories: Paper, Plastics, Metal and Glass; and
  - Plastic sub-category specific recovery targets for:
    - **Rigid plastics** including PET, HDPE, Polystyrene and Other Plastics such as #5 Polypropylene
    - **Flexible Plastics** including Film and Laminates.

#### 5.3.1. Program Performance Target

Under the Recycling Regulation, the program is expected to achieve a 75% recovery rate or another recovery rate established by the director. The recovery rate is defined in Section 1 of the *Recycling Regulation* as “the amount of product collected divided by the amount of product produced, expressed as a percentage”.

Every load of material collected in the PPP program is recorded, reviewed, verified and approved by Recycle BC. In 2017, approximately 250,000 loads of material were processed. Annually, an independent auditor performs an assurance audit on collected quantities reported by Recycle BC to verify the data used to calculate the reported recovery rate.

Recycle BC also reviews the reported quantities of PPP producers supply to residents of British Columbia. Quantities are also subjected to periodic third party assurance audits.

Consistent with the regulatory requirement stated above, the total verified quantity collected divided by the total verified quantity supplied yields the program recovery rate. To date, Recycle BC has achieved the 75% recovery rate and will build upon its successful performance by increasing the program target over time. For example, using 2017 quantities: 174,942 tonnes of collected PPP, divided by 234,847 tonnes of PPP supplied by Recycle BC members, equals 75%.<sup>25</sup>

To increase the program’s performance beyond the current 75% recovery rate will require Recycle BC to expand accessibility and continually seek opportunities to increase the quantity of materials collected in the system. These initiatives require careful planning and implementation efforts before improved program performance can be realized.

As such, the program will seek to achieve the following recovery targets:

2018	2019	2020	2021	2022
75%	75%	77%	77%	78%

Today, some 70% of the total tonnes collected by the program are comprised of the Paper category. This category recovers at a rate much higher than the Plastic, Metal and Glass categories and as such, makes a significant contribution to the program’s recovery performance. Recycle BC will closely monitor the impacts of changing material composition (i.e. the evolving tonne) on the mix of material available for collection to ensure the operational responses needed to maintain performance are incorporated in annual plan activities.

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<sup>25</sup> 174,942 collected tonnes and 75% recovery rate reflect the exclusion of tonnes collected by Recycle BC on behalf of other stewardship programs.



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### 5.3.2. Material Category Performance Targets

This plan introduces material category recovery performance targets for Paper, Plastic, Metal and Glass. In addition to establishing targets for these four major categories, Recycle BC has set recovery performance targets for rigid and flexible plastic subcategories described above.

The proposed targets are:

Material Category	2017 Recovery Rate	Target Recovery Rate	Year to Achieve Target
Paper	87%	90%	2020
Plastic	41%	50%	2025
Rigid Plastic	50%	55%	2022
		60%	2025
Flexible Plastic	20% <sup>26</sup>	22%	2022
		25%	2025
Metal	66%	67%	2020
Glass	72%	75%	2020

As material categories achieve and maintain the target recovery rate for two years, a new target will be proposed.

These material-specific recovery targets are consistent with the European Union's targets, including plastic targets of 50% by 2025 and 55% by 2030, set as part of the efforts to transition to a circular economy. Similarly, they are consistent with the targets set in the Plastics Charter, recently tabled by Canada at the 2018 G7 meeting in Charlevoix, Quebec, (i.e., recycle and reuse 55% of plastic packaging by 2030 and recover 100% of all plastics by 2040).<sup>27</sup>

Recycle BC is the first jurisdiction in North America to have material-specific reporting for packaging and paper product and to set targets for rigid and flexible plastic subcategories. In breaking new ground, Recycle BC has carefully considered the growth rates required to achieve these targets using collection data from the first four years of the program, noting that the targets as outlined above are ambitious, particularly for plastics.

The following table indicates the year-over-year growth rates that will be required to achieve the proposed targets. The growth rates have been colour-coded to indicate whether Recycle BC believes they are achievable with or without intervention, using, for example, targeted consumer P&E campaigns and/or innovations in recycling technologies or new end markets and improvements in collection infrastructure. As implementing these program improvements can be complex, the timelines needed to yield measurable performance improvements can vary and therefore the target dates differ by material category. The 2022 interim plastics targets reflect the extensive investments that Recycle BC is committed to making to ensure that its targets are achieved.

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<sup>26</sup> Please note that in 2017 plastic laminates were not targeted for collection but nonetheless residents disposed of them in the Recycle BC system and those quantities are included here.

<sup>27</sup> Ibid. Ref. 8

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Material Category	Recovery Rates - Current	PP Recovery Rate Targets		Annual Growth Rate Required to Achieve Targets	
		2020	2025	2017 - 2020	2017 - 2025
Paper	87%	90%		1.1%	
Plastic	41%		50%		2.5%
Metal	66%	67%		0.1%	
Glass	72%	75%		1.0%	

< 1%	Achievable
1% - 2%	Risk, may need intervention
> 2%	Intervention required

It should also be noted that when calculating the program and material category recovery rates, Recycle BC will exclude any quantities of material collected on behalf of others to ensure there is no 'double-counting' of recovered tonnes by Recycle BC and other agencies on behalf of whom material is collected. For example, some deposit containers are disposed of by residents in the Recycle BC system. These quantities are sold to Encorp Pacific and are not included when Recycle BC calculates its program and material category performance. Further, newspapers are managed in the Recycle BC system and reported by News Media Canada in the Annual Report of its Stewardship Plan performance. These are two examples where Recycle BC is compensated to manage materials on behalf of others but does not credit its program performance with these materials.

Recycle BC will continue to work with other stewardship agencies to identify relevant packaging managed in the Recycle BC collection system and to help ensure that no recovered packaging is claimed by more than one stewardship organization.

### 5.4 Reporting

Recycle BC reports annually on indicators as summarized below:

- **Accessibility indicators** to describe access to PPP collection services in the province of BC such as:
  - Single-family and multi-family households receiving household collection service;
  - Number and service area locations of depots accepting PPP;
  - Changes in the number and location of collection facilities from the previous annual report
- **Operational effectiveness indicators** characterizing program performance such as:
  - Tonnes of PPP collected within each regional district;
  - Kilograms per capita of PPP collected within each regional district;
  - Tonnes of PPP recycled and recovered for the province;
  - Kilograms per capita of PPP recycled for the province;
  - Recovery rate expressed as a percentage for the province;
  - Tonnes and recovery rate expressed as a percentage for the material categories Paper,

## Packaging and Paper Product Extended Producer Responsibility Plan

Plastic, Metal and Glass and indicating year-over-year performance change variance from the 2017 baselines.

- Tonnes and recovery rate expressed as a percentage for the Plastic sub-categories of Rigid Plastic and Flexible Plastic and indicating year-over-year performance change variance from the 2017 baselines. Each annual report will also provide a status update on the measures being taken to achieve all material targets.
- **Quantities managed on behalf of other parties**
  - Tonnes of newspapers recovered in British Columbia
  - Tonnes of other material recovered on behalf of other parties in British Columbia
- **Management of collected PPP and other materials in relation to the pollution prevention hierarchy**
  - Total Tonnes of PPP and other materials managed by recycling;
  - Tonnes of Paper, Plastic, Metal and Glass managed by recycling
  - Tonnes of PPP and other materials managed by recovery (engineered fuel and energy from waste broken out separately in the report);
  - Tonnes of PPP and other materials managed by disposal;
- **Operational efficiency indicators** reflecting program performance in financial terms such as:
  - Total program cost per tonne;
  - Total program cost per household;
- **Environmental impact measures** to characterize actions intended to reduce the environmental impacts of packaging and paper product by producers who are members of Recycle BC and by Recycle BC; and
- **Resident awareness indicators** to assess public awareness and engagement such as:
  - Percentage of residents aware of the Recycle BC program;
  - Percentage of residents reporting use of available collection services; and
  - Visits to the Recycle BC website.

In addition to compiling data for the indicators listed above, Recycle BC will begin to compile GHG data from its contractors in 2018 with the full data tracking system functional by 2019 and GHG performance reported in 2020.

Also, starting in 2019 tonnes and recovery rates for the following material categories will be reported annually: Paper, Plastic, Metal and Glass, as well as Plastic sub-categories of Rigid Plastic and Flexible Plastic.

Recycle BC reports on the performance of the PPP program in an annual report submitted to the BC MoECCS and posted on its website by July 1 each year. A comprehensive list of the performance metrics reported by Recycle BC is available as Appendix B to this Program Plan. Recycle BC includes a reasonable assurance opinion of the accessibility indicators and operational effectiveness indicators by a third-party in its annual report.

### 5.4.1 Third Party Assurance

Stakeholders can be confident in the metrics reported by Recycle BC because each year Recycle BC is subject to third party assurance for non-financial information in the annual report. Annually, Recycle BC provides its auditors with the Guidance provided by the Ministry of Environment and Climate Change Strategy to ensure the objectives of the audit are satisfied.

## Packaging and Paper Product Extended Producer Responsibility Plan

The findings of the third party assurance audit are included in the Recycle BC annual report.

### 6. Consultation

During the lead up to the launch of Recycle BC (then Multi-Material BC) in 2014, Recycle BC used a combination of mechanisms to consult with stakeholders during development of the Program Plan. This consultation period resulted in a number of changes to the original version of the Program Plan.

Recycle BC was required to host a stakeholder consultation within five years of the launch of the original program plan. In November 2017, Recycle BC began the consultation process with a two-day series of workshops.

The consultation was held on November 15 and 16, 2017 in New Westminster, BC and included nine workshop sessions on topics as listed below:

- 3 Years of Data;
- Curbside Collection;
- Multi-family Collection;
- Depot Collection;
- Contamination;
- Research and Development: Other Flexible Plastic Packaging;
- Streetscape;
- Marketing and Communications; and
- Program Plan Updates.

Stakeholders who were not able to attend the event in person were able to view four workshops via webcast and submit feedback or comments online until December 15, 2017. A consultation report summarizing feedback on a variety of topics was posted in February 2018. Click [here](#) to read the Consultation Report.

The process of reviewing and revising the Program Plan in conversation with our stakeholder community continued in 2018 as Recycle BC explored how it could make significant progress toward achieving a circular economy for plastics and other materials. During the summer of 2018, our stakeholder community was asked to consider several important revisions to the draft plan designed, among other things, to increase the plastics recovery rate and prevent leakage into our environment. Click [here](#) to read the Consultation Report.

This Program Plan contains substantive commitments (e.g., updated accessibility criteria for curbside service, streetscape services etc.) that could result in further amendments to the Program Plan during the next five years. Recycle BC will ensure consultations with the stakeholder community are conducted prior to submitting additional proposed amendments to the MoECCS for approval. Research that is likely to result in associated stakeholder consultation is provided in the Appendix B.

Finally, in accordance with Recycling Regulation Section 5(1)(b), Recycle BC provides continuous opportunities for stakeholder input in the implementation and operation of its product stewardship program. Stakeholders are invited to contact Recycle BC at [consultation@recyclebc.ca](mailto:consultation@recyclebc.ca).

# Packaging and Paper Product Extended Producer Responsibility Plan

## Appendix A – Glossary

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**Collector**

Entity providing services for collection of PPP from households or from streetscapes under contract with Recycle BC.

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**Depot**

Facility where residents can drop off PPP under contract to Recycle BC.

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**Market Clearing Price**

Payment available to collection service providers (subject to executing an agreement to provide the collection service, comply with the collector qualification standard on a continuous basis, report specified data on a defined schedule) designed to stimulate collection activities and act as a market clearing mechanism that causes quantities of supply and demand to be equal.

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**ICI**

Industrial, commercial and institutional.

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**Processing**

Manual or mechanical sorting and quality control of PPP for the purpose of shipping to recycling end-markets.

---

**Primary Processor**

First receivers of collected PPP that market at least some types of processed PPP directly to end markets. Primary processors may engage downstream processors that can more efficiently or effectively sort, process and market some types of PPP.

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**Qualification Standard**

Minimum operating standard that a service provider must meet on a continuous basis in order to be eligible to provide collection, depot operation and/or processing services under a contract with Recycle BC.

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**Recovery Rate**

Calculated as a percentage with the numerator representing the quantity of PPP collected and the denominator representing the quantity of PPP supplied.

$$\text{Recovery Rate \%} = \frac{\text{Collected}}{\text{Supplied}} \times 100$$

---

**Service Provider**

Entity that collects PPP from single-family or multi-family households or streetscapes, operates a depot or provides post-collection services under contract with Recycle BC

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## Packaging and Paper Product Extended Producer Responsibility Plan

### Appendix B – Summary of Performance Measures

Measures	2018	2019	2020	2021	2022 <sup>28</sup>
<b>Recovery Target</b>	Maintain a program recovery rate of 75%.			Conduct a curb, multi-family and depot cost study overseen by the Advisory Committee. Pending results, and in consultation with stakeholders, Recycle BC will revise terms effective 2021.	
	Establish targets for Paper, Plastic, Metal and Glass. Establish targets for Plastic sub-categories of Rigid Plastic and Flexible Plastic in consultation with stakeholders	Report 2018 category recovery performance for Paper, Plastic, Metal and Glass and Plastic sub-categories of Rigid Plastic and Flexible Plastic.  Develop action plans to achieve material specific targets by dates as stated in Section 5.3.2 and consult with stakeholders	Achieve a 2% increase in overall program performance – new target is 77% <ul style="list-style-type: none"><li>Assess performance status for all materials.</li><li>Establish corrective action plans for under-performing material categories.</li><li>Update targets for materials that have achieved their performance targets for a period of two years.</li></ul>	Maintain program recovery rate of 77%	Achieve a program recovery rate of 78%
<b>Recovery/Collection Reporting<sup>29</sup></b>	<ul style="list-style-type: none"> <li>Tonnes of PPP and other materials collected within each Regional District;</li> <li>Kilograms per capita of PPP and other materials collected within each Regional District;</li> </ul>				

<sup>28</sup> Recycle BC will maintain 2022 performance levels and reporting requirements beyond 2022.

<sup>29</sup> Reported in annual report submitted to BC Ministry of Environment and Climate Change Strategy on July 1 each year.

## Packaging and Paper Product Extended Producer Responsibility Plan

Measures	2018	2019	2020	2021	2022 <sup>28</sup>
	<ul style="list-style-type: none"><li>• Tonnes of PPP and other materials recycled and recovered for the province;</li><li>• Kilograms per capita of PPP and other materials recycled and recovered for the province;</li><li>• Recovery rate expressed as a percentage for the province.</li><li>• Tonnes and recovery rate expressed as a percentage for the major categories of Paper, Plastic, Metal and Glass and for the plastic sub-categories of Flexible and Rigid</li></ul>				
Accessibility Performance	Provide curbside collection of PPP to a minimum of 973,400 curbside households and 421,600 multi-family households (active service counts as of February 14, 2018).	<p>Continue to on-board eligible communities with the exception of any households where a local government eligible to participate in the Recycle BC program declines to enter into a collection agreement with Recycle BC.</p> <p>Revise eligibility criteria for unincorporated communities and conduct stakeholder consultation.</p>	<p>Annually maintain, at a minimum, single-family and multi-family household service levels where these households currently receive PPP collection.<sup>30</sup></p> <p>Recycle BC will continue to offer financial incentives to all eligible curbside programs to join the Recycle BC program. Recycle BC will review multi-family household participation levels annually and expand multi-family service to BC residents through financial incentive offers to qualified multi-family collectors each year. Recycle BC will identify communities without significant Recycle BC presence in multi-family recycling and offer an established financial incentive to deliver multi-family building collection services.</p> <p>2021: Revise eligibility criteria for communities immediately adjacent to existing curbside service areas.</p>		
	<ul style="list-style-type: none"><li>• Maintain a minimum accessibility performance at 98% and strive to improve accessibility.</li><li>• Annually provide depot collection to communities across BC with a minimum of 200 depot locations. Recycle BC will annually assess the need to expand depot collection coverage in order to address under-served areas and to provide depot accessibility for packaging and paper materials that are not collected at curb side or through multi-family service.</li><li>• Following completion of its on-boarding expansion phase, Recycle BC will conduct a province-wide depot accessibility assessment in 2019 to determine adequacy of depot coverage.</li></ul>				
Accessibility Reporting	<ul style="list-style-type: none"><li>• Single-family and multi-family households receiving household collection service; and</li><li>• Number and locations of depots accepting PPP.<sup>31</sup></li><li>• Changes to curbside accessibility will be reported in Recycle BC’s annual report each year.</li><li>• First Nations access to collection services will be reported in Recycle BC’s annual report each year.</li></ul>				

<sup>30</sup> With the exception of any households where a service provider that currently provides collection of PPP terminates their Services Agreement with Recycle BC.

<sup>31</sup> Reported in annual report submitted to BC Ministry of Environment and Climate Change Strategy on July 1 of each year.

## Packaging and Paper Product Extended Producer Responsibility Plan

Measures	2018	2019	2020	2021	2022 <sup>28</sup>
Other Collection: Streetscape	Continue to perform further research through streetscape collection projects to determine if a viable recovery of PPP can occur in the new restricted global marketing conditions.	In 2019 Recycle BC will convene a Streetscape Collector Round Table to consult on the program’s design and financial offering. Study report published with consultation 2020. Implement streetscape collection and recycling services by offering a financial incentive to eligible local governments for the provision of services. <sup>32</sup>			
Other Collection: Organics	Research extent of PPP found in the organics stream	Include End of Life disposition in Pollution Prevention Hierarchy Report. Develop a market clearing price financial incentive in consultation with stakeholders, reflecting the portion of PPP found in the organics waste stream. <sup>33</sup>			
Consumer Awareness Targets	Maintain a resident awareness target of 90% or greater for a packaging and paper product recycling program. Continue annual consumer research to measure resident awareness. Conduct regular quantitative research to measure the effectiveness of resident education programs and to gather accurate provincial information on recycling habits, service levels, and brand and program awareness. 2020: multi-family targeted awareness activity deployed.				
Consumer Awareness Reporting <sup>34</sup>	<ul style="list-style-type: none"><li>• Percentage of residents aware of packaging and paper product recycling program;</li><li>• Percentage of residents reporting use of available collection services; and</li><li>• Visits to the Recycle BC website.</li></ul>				
Pollution Prevention Hierarchy Performance	Target all PPP for collection and manage according to the pollution prevention hierarchy including shifting as much of the currently unrecyclable PPP from disposal or recovery up the hierarchy into recycling as possible.	Continue research and development to explore ways to recover material that is currently non-recyclable.			
	Direct 85% to 90% of collected PPP to recycling commodity markets. Assess options to increase the percentage of collected PPP directed to recycling commodity markets.				
Pollution Prevention Hierarchy Reporting <sup>35</sup>	<ul style="list-style-type: none"><li>• Tonnes of PPP managed by recycling;</li><li>• Tonnes of PPP managed by recovery (engineered fuel);</li><li>• Tonnes of PPP managed by recovery (energy-from-waste);</li><li>• Tonnes of PPP managed by disposal; and</li></ul>				

<sup>32</sup> Subject to proof of concept through testing effective delivery of streetscape collection systems.

<sup>33</sup> Please note that, as referenced in this Program Plan, the "Organics" commitments will be met if the quantity of PPP is significant and Recycle BC is able to determine the quantity of PPP recovered annually in organic waste collection programs. See page 22 above.

<sup>34</sup> Reported in annual report submitted to BC Ministry of Environment and Climate Change Strategy on July 1 each year.

<sup>35</sup> Reported in annual report submitted to BC Ministry of Environment and Climate Change Strategy on July 1 each year.



## Packaging and Paper Product Extended Producer Responsibility Plan

Measures	2018	2019	2020	2021	2022 <sup>28</sup>
	<ul style="list-style-type: none"> <li>Environmental impact measures to characterize actions intended to reduce the environmental impacts of PPP by producer members of Recycle BC, and by Recycle BC.</li> </ul>				
<b>Other Performance Measure: Greenhouse Gas Emissions (GHG)</b>	Compile GHG data from Recycle BC service providers.	Full GHG data tracking system functional.	GHG performance reported – baseline year report.	GHG performance reported annually.	
<b>Other Reporting Metric: Program Cost<sup>36</sup></b>	<ul style="list-style-type: none"> <li>Total program cost per tonne; and</li> <li>Total program cost per household.</li> </ul>				

<sup>36</sup> Reported in annual report submitted to BC Ministry of Environment and Climate Change Strategy on July 1 each year.

### Appendix C – Producer Members of Recycle BC

A total of 1291 producers are currently members of Recycle BC as of February, 2018. Producer companies that have joined Recycle BC fall into the following sector categories:

- Food and consumer products
- Retailers (grocers, mass/general merchandisers, hardware/housewares, drug stores and specialty merchandisers)
- Electronic manufacturers/brand owners
- Horticulture and agriculture
- Media and printed paper
- Quick service/take-out restaurants
- Paint and chemical products
- Other/miscellaneous

A complete membership list is updated annually and posted on Recycle BC's website [here](#).

## Packaging and Paper Product Stewardship Plan

### Appendix D – Definition of Producer for the Purposes of Producer Obligation and Reporting

“**Brand**” is a trademark.

“**Brand Owner**” is a Person Resident in British Columbia who uses the product in a commercial enterprise, sale, offer for sale or distribution in British Columbia and who is:

- (a) the owner of the registered or unregistered trademark; or
- (b) a licensee of the registered or unregistered trademark, where “licensee” includes a person who packages goods and includes any person whose corporate name or business name registration contains the trademark;

And.

“**Consumer**” means an individual (other than a Person in the Industrial, Commercial, or Institutional (IC&I) sector) to whom Packaging or Paper Product is Supplied.

“**First Importer**” is a Person Resident in British Columbia who imports Packaging or Paper Product into British Columbia or is the first to take possession or control of Packaging or Paper Product in British Columbia for use in a commercial enterprise, sale, offer for sale or distribution in British Columbia and for which a Brand Owner does not exist.

“**Franchisor**”, “**Franchisee**”, “**Franchise System**”, or “**Subfranchise**” have the meaning ascribed to these terms in the *Franchises Act* or as may be amended or replaced from time to time:

<http://www.bclaws.ca/civix/document/id/lc/statreg/15035> . This includes Franchisors who conduct business in British Columbia through their British Columbia Franchise System, regardless of whether the Franchisor has a Franchisor-owned fixed place of business in British Columbia.

“**IC&I Material**” means Packaging or Paper Product which is supplied to the industrial, commercial, or institutional sector and which is not subsequently Supplied to Consumers.

“**Person**” means an individual, partnership, joint venture, sole proprietorship, corporation, government, trust, trustee, executor, administrator or any other kind of legal personal representative, unincorporated organization, association, institution, or entity.

“**Producer**” means the Person who is obligated with respect to the Packaging or Paper Product, and includes any person who elects to become a Voluntary Producer in accordance with Recycle BC’s policies.

“**Resident in British Columbia**” with respect to a corporation, means a corporation that has a permanent establishment in British Columbia. In the case of Franchisors, it includes Franchisors who conduct business in British Columbia through their British Columbia Franchise System, regardless of whether the Franchisor has a Franchisor-owned fixed place of business in British Columbia.

Resident in British Columbia, with respect to a corporation, means a corporation that has a permanent establishment in British Columbia, where “permanent establishment” includes branches, mines, oil wells, farms, timberlands, factories, workshops, warehouses, offices, agencies and other fixed places of business. In addition to the foregoing, the following deeming provisions shall apply:

## **Packaging and Paper Product Stewardship Plan**

### **Contracting Employees or Inventory Sufficient**

Where a corporation carries on business through an employee or agent who has general authority to contract for the corporation or who has a stock of merchandise owned by the corporation from which the employee or agent regularly fills orders which the employee or agent receives, such employee or agent shall be deemed to operate a permanent establishment of the corporation.

### **Commission Agent not Sufficient**

The fact that a corporation has business dealings through a commission agent, broker or other independent agent shall not of itself be deemed to mean that the corporation has a permanent establishment.

### **Subsidiary of Parent not Sufficient**

The fact that a corporation has a subsidiary controlled corporation in a place or a subsidiary controlled corporation engaged in a trade or business in a place shall not of itself be deemed to mean that the first-mentioned corporation is operating a permanent establishment in that place.

### **Licensed Insurance Company Sufficient**

An insurance corporation is deemed to have a permanent establishment in each jurisdiction in which the corporation is registered or licensed to do business.

### **Purchasing Office not Sufficient**

The fact that a corporation maintains an office solely for the purchase of merchandise shall not of itself be deemed to mean that the corporation has a permanent establishment in that office.

### **Ownership of Land Sufficient**

Where a corporation, otherwise having a permanent establishment in Canada, owns land in a province or territory of Canada, such land is a permanent establishment.

### **Production Packing and other Activities Sufficient**

The fact that a non-resident corporation in a year produced, grew, mined, created, manufactured, fabricated, improved, packed, preserved or constructed in whole or in part anything in Canada, whether or not the corporation exported that thing without selling it prior to exportation, shall of itself, be deemed to mean that the corporation maintained a permanent establishment at any place where the corporation did any of those things in the taxation year.

### **Machinery or Equipment Sufficient**

The use of substantial machinery or equipment in a particular place at any time in a year of a corporation constitutes a permanent establishment of such corporation in that place for such a year.

### **Principal Place of Business Sufficient**

Where a corporation has no fixed place of business, it has a permanent establishment in the principal place in which the corporation's business is conducted.

### **Charter or By Laws designating Head or Registered Office Sufficient**

Where a corporation does not otherwise have a permanent establishment in Canada, it has a

## Packaging and Paper Product Stewardship Plan

permanent establishment in the place designated in its charter or by-laws as being its head office or registered office.

**“Service Packaging”** means packaging which may or may not bear a Brand that is Supplied at the point of sale by the retail, food-service or other service providers to facilitate the delivery of goods, and includes all bags, boxes, and other items for the containment of goods at point of sale.

**“Supplied”** means sold, leased, donated, disposed of, used, transferred the possession of or title of, or otherwise made available to a Consumer in British Columbia or distributed for use by a Consumer in British Columbia. Supply and Supplies have similar meanings.

**“Voluntary Producer”** means any non-resident Brand Owner who elects to become a member of Recycle BC in accordance with Recycle BCs policies and membership agreement.

### DESIGNATION OF PRODUCERS

#### Designation of Producers

The following Persons are designated as Producers for Packaging and Paper Product. If two or more Persons are designated as a Producer pursuant to the following provisions, then the earlier provision shall prevail.

#### Producers for Packaging

For Packaging (except for Service Packaging) the Producer is the Person Resident in British Columbia who:

- a) is the Brand Owner for the British Columbia market; or
- b) if the Person described in paragraph (a) does not exist, then a Person who manufactures, packs or fills or causes the manufacturing, packing or filling of products regardless of whether the activity takes place in British Columbia or not; or
- c) if a Person described in paragraphs (a) or (b) does not exist, then the First Importer, unless the First Importer is a Consumer.

#### Producers for Service Packaging

Any Person that Supplies Service Packaging in British Columbia at the point-of-sale shall be the Producer for such Service Packaging.

#### Producers for Paper Product

For Paper Product, the Producer is the Person Resident in British Columbia who:

- a) is the Brand Owner of the Paper Product, whether production of the Paper Product takes place in British Columbia or not; or
- b) if a Person described in paragraph (a) does not exist, then a Person who is the title-owner of the Paper Product or is a licensee of those rights for British Columbia, whether production of the Paper Product takes place in British Columbia or not; or
- c) if a Person described in paragraphs (a) or (b) does not exist, then a Person who produces or manufactures the Paper Product whether the production or manufacturing takes place in British Columbia or not; or
- d) if a Person described in paragraphs (a), (b), or (c) does not exist, then the First Importer, unless the First Importer is a Consumer.

### Franchisor is Obligated to Report for its British Columbia Franchisees

## **Packaging and Paper Product Stewardship Plan**

A Franchisor is obligated to report for its British Columbia Franchisees with respect to all Packaging and Paper Product which is Supplied within the Franchisor's British Columbia Franchise System.

### **More Than One Brand Owner for the Same Packaging or Paper Product**

If there is more than one Brand Owner for the same Packaging or Paper Product, the Brand Owner more directly connected to the production of the Packaging or Paper Product shall be deemed to be the Producer.

### **Products Containing Two or More Independent Brands**

If products containing two or more independent Brands are packaged to be Supplied together, the Brand Owner, First Importer or Franchisor most directly connected to the joint Packaging shall be designated as the Producer for the joint Packaging.

## **Appendix E – Recycle BC Consultation Process**

Recycle BC undertook an extensive consultation process as part of creating and finalizing the new 5-year Recycle BC Program Plan. There were five consultation points, most consisting of multiple events or presentations. In total, 18 consultation presentations or sessions were delivered. These took place in-person, by webinar, or, in most instances, both. Below is a summary of our consultation process. Detailed feedback and written submissions can be found on the Recycle BC website here: [https://recyclebc.ca/stewards/regulation\\_and\\_stewardship\\_plan/](https://recyclebc.ca/stewards/regulation_and_stewardship_plan/).

### **November 2017**

On November 15-16, 2017, a two-day consultation event took place. Pre-interviews were conducted with collectors to help inform and shape the agenda of the two-day session. The event consisted of nine presentations, many delivered more than once, and collaborative working time. While all the presentations were delivered in person, four were also delivered by webcast. During the event the Recycle BC team presented information, tested ideas, facilitated brainstorming, and gathered feedback. Following the event there was a written feedback period from November 15 – December 16. A detailed consultation report was prepared that captured all the feedback received at the event and during the written feedback period. This feedback was considered when drafting the revised Program Plan.

### **December 2017 – March 2018**

During this time, the new Recycle BC Program Plan was drafted. The draft plan was published in March 2018 for review and consultation. Changes to the plan at this stage included:

- Reflection of recent changes to the Recycling Regulation such as the clarification of non-resident franchisors as obligated stewards and extension of obligated materials from printed paper to paper products,
- New eligibility criteria for communities with curbside programs wishing to join Recycle BC,
- New eligibility criteria for communities wishing to introduce curbside programs and join Recycle BC, and
- Clear eligibility criteria and timelines for communities with curbside programs that wish Recycle BC to directly operate their programs.

Feedback was accepted until May 14, 2018. Feedback from written and online submissions was considered when creating the next version of the revised Program Plan.

### **April 2018**

On April 17, 2018, a webinar took place to review the key components of the draft revised Program Plan. During this webinar, a live question and answer session also took place. A detailed question and answer document was prepared and posted summarizing and addressing feedback. This feedback was considered when creating the next version of the revised Program Plan.

### **May 2018**

On May 9, 2018, an in-person meeting took place with the Metro Vancouver waste managers. Feedback and questions from this meeting are included in the detailed question and answer document mentioned above.

On May 30, 2018, an in-person and webcast presentation was hosted to share the results of the collector cost study and updates to the collector Statements of Work. During this session, a live question

and answer period took place, both live and by webcast. A detailed question and answer document was prepared and posted summarizing and addressing questions.

#### **June 2018**

A series of three presentations were presented on the collector financial model and incentive rates. On June 12, 2018, Recycle BC conducted an overview presentation, both live and by webcast, on the revised financial incentives and payment methodology, which were determined by previous consultations and the results of the cost study, as well as impacts of the global recycling markets. On June 27, 2018, two additional presentations were delivered by webcast to provide more detailed information on the curbside and multi-family agreements and the depot agreements.

#### **May – July 2018**

During this time, the Recycle BC Program Plan was amended to incorporate stakeholder feedback from the first consultation phase directly related to the Program Plan. The draft plan was published in July 2018 for review and consultation. Changes to the plan at this phase included an increased general recovery rate, material-specific targets for plastics, metal, glass, and paper, a broadened scope of obligated material to include packaging-like products and single-use plastic products such as drinking straws, plastic cutlery, etc. Feedback was accepted until September 6, 2018. Feedback from written submissions was considered when creating the next version of the Program Plan.

#### **July 2018**

In July three Program Plan consultation events took place. All were both live and by webcast. On July 17, 2018, a consultation presentation was held for stewards. On July 18, 2018, a consultation presentation was held for collectors. On July 19, 2018, a consultation presentation was held for environmental non-governmental organizations. Detailed question and answer documents and a consultation report was prepared and posted summarizing and addressing the questions and feedback submissions. This feedback was considered when creating the next version of the revised Program Plan.

#### **September – October 2018**

During this time, the Recycle BC Program Plan was amended to incorporate stakeholder feedback from the second consultation phase directly related to the Program Plan. The revised October 2018 plan was posted to Recycle BC's website.

#### **October – present**

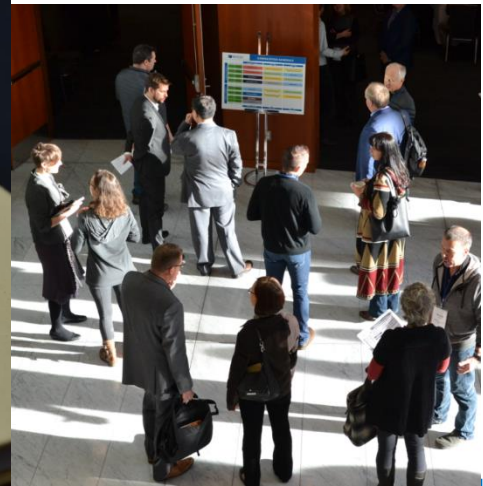
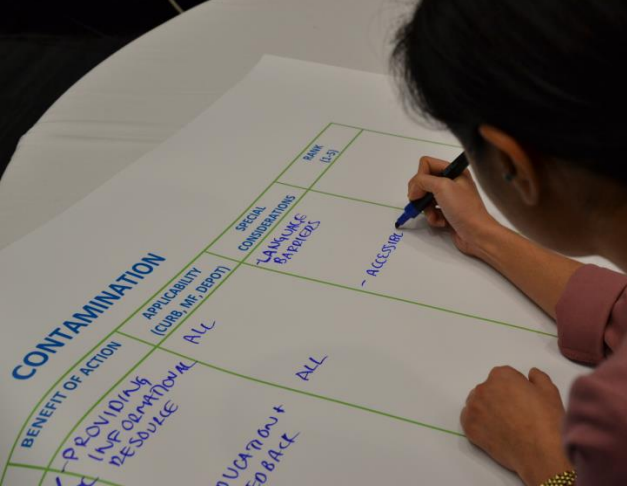
Recycle BC has been in dialogue with Ministry of Environment and Climate Change Strategy on suggested feedback to the Program Plan.

This appendix contains documents generated as a result of stakeholder questions and feedback for each of the consultation periods.



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**RECYCLEBC™**

# 2017 Consultation Report

Published February 28, 2018





Dear Stakeholders,

Thank you to all our partners for being part of our consultation process.

We really appreciated the active and engaged participation we received at our consultation last November. Over the course of the two-day consultation, nine workshops were led by the Recycle BC team and time allocated for questions, ideas, views, and comments on the workshop topics as well as other subjects important to our stakeholders.

We received important and authentic feedback, questions and concerns and will consider these as we move into the next stages of the revised program plan development and creation of the new collector agreements.



We value our partners and appreciate you being part of and contributing to the process.

Thanks again for your feedback,

Kind regards,

**Allen Langdon**

Managing Director, Recycle BC



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## Overview

In November 2017, Recycle BC hosted a consultation session over the course of two days. The consultation brought together collectors, representatives from government departments, industry stakeholders, other stewardship organizations, educators, community champions and others. The two days involved extensive discussion about Recycle BC's proposed changes to its Program Plan, Master Services Agreement, Statements of Work and collection payment framework. It also included various activities and opportunities for stakeholders to ask questions and provide their feedback. Recycle BC is committed to listening to the views of its stakeholders and doing its best to ensure those views are taken in to consideration when changes are made to the Recycle BC program as it continues to evolve.

Participants were solicited for feedback through the following channels:

- Pre-consultation survey
- Activities during the event including: group workshops, comment boards, webinar questions, Q&A sessions
- Post consultation feedback period (Written Feedback Period)

This report is a summary of the feedback we received from our stakeholders during and after the consultation session. Recycle BC will be responding and addressing comments moving forward in the development of the Program Plan and new collector agreements and incentive packages.

Recycle BC felt that the consultation period was an effective way to receive feedback from stakeholders and was a successful process overall. There was active participation at the consultation event and a wide range of thoughts and opinions came forward. Recycle BC found its stakeholders to be collaborative, constructive, direct and inquisitive.

How feedback has been captured and summarized for this report:

We have made every effort to capture the wide range of comments and questions we received, while also striving to keep this document concise. In some cases, we have summarized feedback where it is similar to other comments. Some comments are marked as having received "votes of agreement", referring to some of the feedback activities during the consultation session, such as voting exercises. "Repeated comments and submissions" refer to feedback received in letters and online submissions during the post consultation period. Some comments have been moved from a workshop where it was made to a separate workshop page that better suits the topic, or overlaps with similar comments reflected in that workshop.



## Recycle BC Consultation Process

Following is a summary of the stages of the consultation process and the development of the revised Program Plan, Master Services Agreements and Statements of Work.



## Recycle BC Consultation Participation

### ABOUT

**2** days



**9**

workshop  
topics



**18**

workshop  
sessions



### PARTICIPATION

**137**

organizations

**24 of 29**

Regional Districts  
represented  
(by local governments and  
contracted collectors)

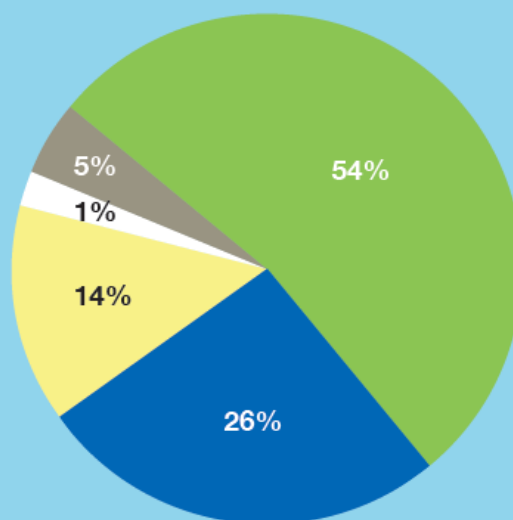
**253**

attendees

222 in person/ 31 via webcast

#### Sectors represented (by individuals attending in-person):

- **120** Local Government/  
First Nations collectors
- **58** Private collectors
- **30** Other  
(includes Ministry of  
Environment,  
post-collection partners,  
stewardship agencies,  
consultants, residents)
- **2** Member businesses  
(stewards)
- **12** Education/non-profit/  
community



### ENGAGEMENT

**900+**

questions  
and comments  
recorded at the  
consultation

**46**

online feedback  
form submissions



**10**

formal letter  
submissions





## Program Plan – Workshop Feedback

### Workshop Purpose

- Discuss the proposed updates to the Program Plan, beyond those identified in other workshops.
- Provide stakeholders the opportunity to give feedback on the current Program Plan and proposed updates to the Program Plan.
- Discuss opportunities to improve efficiency and effectiveness in the delivery of the Recycle BC program.

### What We Heard at the Consultation Session and During the Written Feedback Period

#### The Consultation

- Recycle BC's strengths include good staff, good planning when taking on direct service, good consultation.
- Expectation that consultation feedback is seriously considered and that any changes take into account the many challenges facing rural and un-incorporated communities.
- Requests for more time for consultation. Insufficient time to consult with politicians and member municipalities. No board/council during summer. Not enough time to November 2018 decision process, compounded by an election year.

#### Program Expansion and Concerns for Rural Areas

- The standards for curbside program expansion and minimum population threshold for new curbside service areas severely restrict rural areas and exclude unincorporated areas.^\*
- Would like to see clear and transparent criteria on how/when/who/what for new service area expansion into the program, and specified timelines for waitlist community inclusion.^\*
- Recycle BC takes the position of delivering the program to those communities which make the most economic sense from a business delivery perspective. We counter that Recycle BC is ultimately funded by British Columbians who all deserve fair access to the program.^
- Recycle BC's business model is urban (quantity) biased. Most rural areas won't make profitability threshold. Yet the resident has paid the recycling levy and the tipping fee as the material inevitably ends up in the environment (landfill).^
- 75% of provincial capture does not accommodate need of rural settings. Different standards are needed for urban and rural areas. Current "adequacy" standards exclude rural needs.^
- If Recycle BC wants to be in charge of "appropriate" service levels, performance needs to be assessed on a regional level, not provincial.\*\*
- Requests for the allowance of satellite depots to service rural areas as a way for the program to evolve.\*
- Get out of the way of small communities that want to recycle. They want to improve their communities. They do not want your bureaucracy.
- Some of our Regional District's municipalities are included in the program, while some are not. We've seen confusion among residents in smaller areas who self-haul and small contractors using

\*Several votes of agreement at consultation session.

^ Repeated comment and/or submission.

\*\* High number of votes of agreement and/or consistently repeated comments/submissions.



nearby municipal facilities who aren't under the Recycle BC education banner, and haven't received information about requirements at the facilities. How can Recycle BC better address this issue and future changes to the program that must be communicated more broadly?

### Packaging Design & Recovery Rates

- The program plan should include focus on packaging and printed paper (PPP) redesign to facilitate use and volume reductions, as well as designing for recovery rather than recycling only, as required in section 5(3) of the BC Recycling Regulation.^\*
- Recycle BC must collaborate with the Province to include institutional, commercial and industrial (ICI) material in the program, as well as non-PPP recyclable materials. This will also help reduce confusion amongst residents.\*\*
- Higher fees needed for hard to recycle materials to encourage product re-design.\*\*
- Calls for the creation of initiatives to drive reduction, reuse and recycling of single-use items such as: collaborating with producers to expand extended producer responsibility (EPR); education and behavior change programs; cup, container and bag exchange programs.\*^
- Recovery target should exceed 75% for specific materials, particularly those that are present in the largest quantity and/or have most persistence in the environment.
- EPR is supposed to change packaging choices of producers. This hasn't happened yet.
- Packaging producers need to be present to understand what's good/bad about their packaging, need for re-design for recyclability.\*
- Fee for companies choosing laminate packing is only marginally higher than that for plastic film or PET (Polyethylene terephthalate), for which end-markets exist, materials are accepted and management costs exist. Program pricing should be set to disincentivize packaging which has "no commercial technology available to recycle at scale."
- Please provide recovery rates by material (relative % and absolute tonnes). PPP stewardship programs in other provinces publish this annually and use it to calculate material-specific fees. This information would allow us to measure our progress in BC and allow members to report out against the targets they have set, while equipping them with information to address consumer inquiries.\*^

### Long-Term Plans

- We understand Recycle BC can only present 5-year plans but we assume there is a 25-year vision. The Province has a Solid Waste Management Plan template for a 10-year plan with a vision of 25 years. Recycle BC is a significant partner for any regional district in BC, therefore when a regional district is planning their infrastructure, diversion goals or strategies, how are those valid if Recycle BC may change its direction every 5 years? What is Recycle BC's vision going forward for expanding recyclables from PPP to other items.
- Is Recycle BC willing to make a commitment to review the recovery rate in 2 years?

### Other Requests & Initiatives

- Proposed changes discussed incentives for more tonnage received. However, in our regional district's Solid Waste Management Plan we are asked by the Province to look into reducing before

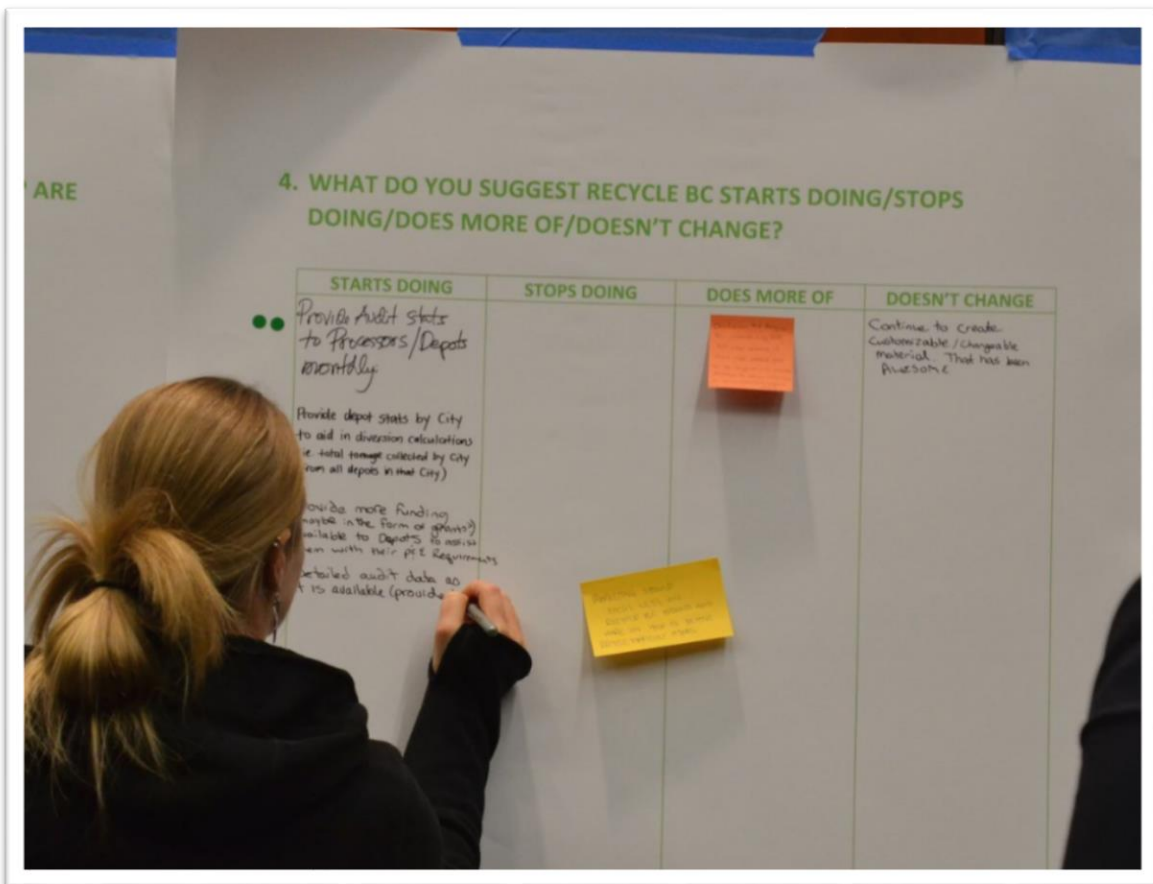
\*Several votes of agreement at consultation session.

^ Repeated comment and/or submission.

\*\* High number of votes of agreement and/or consistently repeated comments/submissions.

considering recycling. Why not incentivize both reduction and recycling based on the region's yearly study?

- Need to acknowledge costs incurred by local governments. Inequitable disbursement of services cause local governments pay for recycling services; in these communities, residents are essentially paying for services twice: point of sale and utilities.
- Please use data to justify changes. We want to understand how data are extracted, and how Recycle BC arrived at its proposals. Repeated questions about baseline figures, and comments on human behaviour.^\*
- Would like to see more information on best practices internationally.
- Would like to see funding of audits at landfills to see how much PPP is still going in to garbage.
- Would like to be able to order materials online (such as oops stickers).
- Further investments in technology are needed.
- Transporters need to be in this discussion to be aware of the local government's concern over timely servicing. The longer material stays on site the greater the likelihood of deterioration.
- Develop a recycling program for frequent contaminants such as propane tanks.
- Would like an app that could scan the UPC code on a product and indicate what it is, and where to recycle it.



\*Several votes of agreement at consultation session.

^ Repeated comment and/or submission.

\*\* High number of votes of agreement and/or consistently repeated comments/submissions.

## Curbside Collection – Workshop Feedback

### Workshop Purpose

- To discuss proposed changes to the Master Services Agreement (MSA) and Curbside Statement of Work (SOW) for local government and First Nations collectors.
- To discuss proposed changes to the curbside payment framework and incentive rates for LG and First Nations collectors.

### What We Heard at the Consultation Session and During the Written Feedback Period

#### Incentive Rates

- Financial incentives do not cover costs of recycling collection services.\*\*
- Incentive rates should be indexed annually, based on the Consumer Price Index to better reflect the rising costs of collection services.^\*
- Would like incentives for cart maintenance.
- Support proposal of collection fee structure being based on container type, not just material stream. This is a more accurate reflection of operational costs.
- Incentive rates for single stream collectors using automated carts shouldn't be so much lower than other container types. Consideration needs to be given to mobility, or flexibility to include new mobility costs. Automated carts also require maintenance costs.
- Despite multi-stream collection providing cleaner products and no apparent decrease in volume compared to single stream, compensation levels don't meet costs. Recycle BC could provide multi-stream collection with additional compensation^ and/or provide an incentive bonus based on contamination levels in addition to the existing incentive bonus that merely favors volume. Perhaps require greater promotion and education expenditures for single stream automated.
- Continued inequity between multi-stream and single stream collection methods provides further impetus for multi-stream municipal collectors to consider exiting the program and moving to the direct service model, or investigating cheaper single stream systems.^
- Consideration should be given to linking increases to collection methodology rather than container type since a collector could be using carts in a semi-automated system, where lids are opened and contents inspected. Increases should not be based simply on number of streams.
- We would prefer to see an all-in cost recovery structure rather than top ups for education, service administration and depots.

#### Top-up Payments

- Should be maintained or increased rather than reduced given that new service requirements will result in additional administrative work.\*^
- Should be the same regardless of whether collection is carried out in-house or via contractor. Providing lower compensation to communities with contracted service doesn't reflect that contractors' admin costs are passed on to local government through contract fees.

\*Several votes of agreement at consultation session.

^ Repeated comment and/or submission.

\*\* High number of votes of agreement and/or consistently repeated comments/submissions.

- Education and Administration top ups should be offered to organizations who subcontract with Recycle BC directly. They do comparable levels of work to local government subcontractors, but do not receive compensation for it.
- Requiring education top ups be used for associated (promotion and education) activities is overly restrictive since local governments are motivated to serve public with other blended activities. This will add administration costs.
- Education incentives should be based on automated versus manual collection trucks.
- Education rates are too low to lower contamination.

### Bonus Structure and Rates

- Request that performance bonuses be adjusted to reflect universal reduction in capture rates of kilograms per household, due to lighter material weights.^
- Regarding the development of a methodology to net out non-PPP and commingled glass for bonus payments: we are paying for contamination through a separate mechanism in the contract (penalties), seems that Recycle BC is double dipping.^

### Receiving Facilities

- Assist local governments in paying for transportation when its part of its service area are more than 60 km to the applicable receiving facility location designated by Recycle BC or propose an alternative that takes some of the financial burden from local governments.^
- About 50% of the homes our regional district services are further than 60km to the applicable receiving facility location designated by Recycle BC. Recycle BC should use distance from home as the boundary line, as the boundaries are not a fair representation of where the actual collection service takes place.
- Request for additional funding for our recycling centre which is used as a transfer point to get curbside material to the processor. Part of this process involves regional district operations staff collecting material for Recycle BC audits. It's not feasible for municipalities to haul curbside material to the processor beyond our regional district.
- Concerns about wait times at receiving facilities, which can be up to an hour during busy times. Would like busy facilities to have inbound and outbound scale to ensure traffic flow.
- Issues with inadequate storage space to keep materials dry at receiving facilities; should have compensation for storing materials until Green by Nature (GBN) sends hauler.\*
- Requiring drivers to assist with cleaning up bulk-head failures or cross contamination at receiving facilities must only occur in the case of driver error. Such failures may result from driver error, mechanical damage or equipment design.
- It's unreasonable to ask drivers for assistance in cleaning up bulk-head failures, they have no time.
- Requiring advanced approved of voluntary consolidation of material can be a cost issue for collectors so should be at their discretion unless Recycle BC will provide cost impacts.

### Logo Requirements

- Various objections to requirement to include Recycle BC logo on additional collection containers expressed: concern about future Recycle BC logo changes or closure; residents look at containers to

\*Several votes of agreement at consultation session.

^ Repeated comment and/or submission.

\*\* High number of votes of agreement and/or consistently repeated comments/submissions.

determine who provides the service; goes beyond contract to life of product; collectors have purchased containers, Recycle BC should include a payment for their logo on containers; want to avoid confusing residents by giving them impression that all materials can be recycled in containers.\*^

- Carts are typically interchangeable amongst the various waste streams. The requirement to approve hot stamps and design features will have a significant impact on cart managements operations and increase costs.^
- Preferred use of logo stickers instead of hot stamps.^\*

### Promotion and Education

- Rather than requiring advance approval of promotion and education materials, we would prefer Recycle BC work with collectors to review and develop applicable material instead of mandating approval.^
- Concerns about turnaround time for approval from Recycle BC. Requests for response times to be established to avoid delays.^\*
- Please ensure terms of reference for conflict resolution is captured in the agreement, in the event there are disagreements in acceptability of promotional material.
- Collection drivers also need to be educated on contamination and help enforce at the curb; this can be a challenge if not all drivers are willing to help educate residents.

### Transition from Single-Use Bags

- Several concerns about logistical and financial requirements of this transition:
- Will require transitioning from split truck with manual loading bi-weekly to weekly automated carts pick-up, doubling our collection efforts and costs.
- Requirement to purchase, distribute and maintain expensive new collection equipment and materials. Who will pay for this?^
- Reviewing material through clear bags at the curb reduces contamination. Open bins require a significant amount of plastic to create, are not recyclable, and contribute to littering. Most residents put out more than one bin per collection.^
- Concern with how current 7-year contract, based on the current bag system, will be impacted.
- Our community has voiced its opposition to this. Elderly citizens find carts cumbersome. We believe this will drive residents to place recyclable items in the garbage.^
- We don't support elimination of a solution that has lower operational and capital costs than carts or blue boxes with similar or better diversion and contamination rates.
- Investing in bag breakers or additional sorting staff to help deal with complications caused by bags at recycling facilities would be cheaper than implementing cart or blue bin programs.
- Streams and bag/bin types shouldn't be mandated. Research should help inform these choices. Request to see some studies.^
- Some participants/submissions in favor of phasing out blue bags.^

\*Several votes of agreement at consultation session.

^ Repeated comment and/or submission.

\*\* High number of votes of agreement and/or consistently repeated comments/submissions.

### Contamination Thresholds

- Regarding introduction of thresholds: In the absence of data related to cross-contamination it is difficult to determine the significance of this issue and related threshold rate. Questions about how such thresholds will be substantiated and measured and how collectors could challenge findings.
- Concerns that newly introduced defined thresholds should instead be incentivized through bonuses.
- We wish to further discuss with Recycle BC matters related to contamination threshold of 3% and related penalties, split weight loads, audits, and provisions for not collecting PPP in inclement weather conditions.
- Regarding proposal to include glass deposit containers in calculation of total comingled glass rate. This is overly punitive. If required, appropriate remuneration must be provided to the collector.

### Approval of Policy on Tagging

- Rather than approval of policy on tagging, we would prefer that Recycle BC work with collectors to determine the best approach for individual communities.
- Recycle BC should research and develop best practice approach to ensure that education through tagging and non-collection of contaminated carts is successful and results in behavior change.
- Our City is not supportive of this requirement. We have already been using “oops stickers”. Letters are also being sent to residents informing them of contamination.
- Some respondents supportive of tagging policy, but not reporting. Others supportive depending on the amount of work involved.

### Other Comments

- Many proposed changes are overly prescriptive, such as requiring approval of a policy on tagging contaminated material, requiring approval of a detailed transition plan for changing container types, requiring approval of significant promotion and education materials. This level of control creates unnecessary bureaucracy and cost.<sup>^</sup>
- Request for more user-friendly claims reports. Can we include truck numbers on claim reports?
- Reconciling payments is incredibly difficult with the way data is shared out by Recycle BC. Why is it the collector’s job to do this work? Payments should show that they reconcile as good practice.
- Please collect and distribute data on costs of service for each collection and stream type and Include variances for population density and composition, age, income.

\*Several votes of agreement at consultation session.

<sup>^</sup> Repeated comment and/or submission.

\*\* High number of votes of agreement and/or consistently repeated comments/submissions.

## Multi-Family Collection – Workshop Feedback

### Workshop Purpose

- To discuss proposed changes to the Master Services Agreement (MSA) and Multi-family Statement of Work (SOW).
- To discuss proposed changes to the multi-family payment framework and incentive rates.
- To provide an opportunity for multi-family collectors to share ideas and best practices.

### What We Heard at the Consultation Session and During the Written Feedback Period

#### Incentive Rates and Top-Ups

- Payment structure and proposed increases are too low.\*^
- Would like to see an inflationary mechanism built into new contracts, no inflationary rise over contractual period puts too great a risk on municipalities.
- Incentives should be tied to clean product.
- Multi-family collection incentives should be the same as curbside collection rates. There are many more challenges addressing multi-family than curbside collection.
- Reduction in administrative top-up doesn't recognize work being done by municipalities and requirements for future checking and approval of promotional materials. Rates should remain as previously set at a minimum.
- Consider increased educational top-up per household linked to contamination reductions from multi-family: incentive to do more to get more.
- Would like to see more encouragement towards multi-stream collection, current payment structure doesn't encourage it.\*^

#### Old Corrugated Cardboard Collection

- Requests for further information regarding reduced incentives for cardboard collection: how will reporting requirements look? What will be expected for collectors in determining where collection is provided if done by an alternative collector? How will segregated cardboard locations be identified and monitored? There will be greater admin costs with tracking these locations, but the admin incentive is being reduced so there is a double hit.\*^
- How to identify who has cardboard bins? Is there data available from haulers? It is doubtful hauler would provide the data.
- If the proposal is intended to encourage more cardboard collection, then Recycle BC must provide some resources for these collectors to adapt service levels to be able to collect these commercial sized bins.\*
- Reduced old corrugated cardboard (OCC) rates are overly punitive, will be a major issue if reductions are placed on municipalities if collected via a different stream. Municipality has no control over who collects or records.^

\*Several votes of agreement at consultation session.

^ Repeated comment and/or submission.

\*\* High number of votes of agreement and/or consistently repeated comments/submissions.



- Rather than explore methodology to reduce municipal incentive rates, potential solutions could include: consideration of an additional incentive to encourage municipal collectors to adopt service, and/or Recycle BC to work with private haulers of OCC to collect this tonnage and or value for OCC.^

### Contamination

- Contamination reduction is a challenge across the board with multi-family sites. Would be helpful if Recycle BC provided research and best practices for reducing contamination in this collection stream.
- Request to raise the contamination rate to at least 5% and to increase resources for dealing with contamination in multi-family buildings. It would be more useful to collectors to have ongoing audit feedback, rather than report cards a few times a year.
- Bonuses are almost impossible to achieve. Would like contamination rates linked into the bonus system.^\*
- Would like clarity on methodology for contamination thresholds.\*
- Deposit glass should not be netted off against total weight.

### Multi-family Expansion

- Help municipalities innovate solutions to multi-family collection through pilot project fund. We need to test new approaches to affect change\*
- Collectors would like to have the ability to expand services to any community, regardless of current SOW service areas. Perhaps tie multi-family collection to issuing of curbside contracts.

### Promotion and Education

- Higher turnover rate of residents in multi-family buildings results in higher costs for P&E than curbside homes. Overall admin costs for curbside are the same for multi-family. The same is true for in-house or contracted services, administrative costs are the same.^
- Concern around the top-down approach for approving P&E materials. Collectors don't need approval, nor should they have to wait for it. Suggestion for Recycle BC to look at long standing programs in the province and adapt messaging to align with the successful programs. Collectors should also have a chance to approve Recycle BC's material.
- Would like frequent sharing of best practices on how to deal with multi-family locations.
- Waste Wizard is difficult to use.

\*Several votes of agreement at consultation session.

^ Repeated comment and/or submission.

\*\* High number of votes of agreement and/or consistently repeated comments/submissions.



## Depot Collection – Workshop Feedback

### Workshop Purpose

- To discuss proposed changes to the Master Services Agreement (MSA) and Depot Statement of Work (SOW).
- To discuss proposed changes to the depot payment framework and incentive rates.

### What We Heard at the Consultation Sessions and During the Written Feedback Period

#### Incentives

- Incentive and baling rates do not cover the cost of depot operations including insurance, sorting materials, or providing staff oversight.\*\*
- Depot facilities may be forced to shut down if rates are not reconsidered. Questions about Recycle BC's business plan for depot survival.^\*
- Recycle BC has done an outstanding job of taking over PPP collection in BC, but has totally misjudged our region. The program should provide a different incentive rate structure to depots in isolated locations (e.g. islands).
- Curbside financial incentives are higher than those provided to rural depots which have to do more work, collect more material and operate longer hours.\*^
- Proposed rates appear to download more costs to local governments and tax payers and don't seem to be in line with what the Province set out to accomplish in 2011: *"the Province amended the Recycling Regulation to make businesses supplying packaging and printed paper responsible for collecting and recycling their products. This was done to shift recycling costs from BC taxpayers to producers, and to give producers more incentive to be environmentally friendly by producing less packaging and waste."*^
- Depot funding shouldn't be based on tonnage. We are collecting PPP at a higher rate with low contamination, and bale much of our products, saving Recycle BC's costs.\*^
- Because Recycle BC is presently providing approximately one-fifth of our operating needs, we require top ups from our regional district, community membership, and fundraising to stay viable. Additional funds proposed for tonnage collection is only cost of living increase, baling incentive increases will only shift this income from GBN to collection side.
- There should be a bonus incentive for low contamination.^\*
- If depots are not funded equitably, residents in some communities will be double paying for PPP.^
- Do the new incentives justify the capital cost for new equipment?
- Recycle BC should not dictate how depots are run if they will not pay adequate incentives.
- Request for a time/motion study to properly identify the time/cost to collect/prepare PPP at depots.

#### Materials

- Recycle BC should increase steward payments for PPP that is not recyclable.^\*
- Proposed incentive rate for "other flexible packaging" isn't sufficient.^\*

\*Several votes of agreement at consultation session.

^ Repeated comment and/or submission.

\*\* High number of votes of agreement and/or consistently repeated comments/submissions.

- Acceptance of other flexible packaging at depots should be voluntary if it is to be used as an engineered fuel source.<sup>^</sup>
- Establish a standard to ensure residents from all communities have fair and equitable access to depots. Because we had to expand our depots to include foam packaging, separated glass and film plastic, our operating costs have increased greatly.

### Depot Classification Changes for Depots with Curbside Service

- Concerns about Group 3 categorization, many questions about thresholds, methodology and data used to arrive at the categorizations and incentive rates.\*<sup>^</sup>
- Strong objections to the proposed elimination of incentive rates for paper, cardboard and containers at government and Group 3 depots.<sup>^\*</sup>  
Proposed approach creates an uneven playing field between public and private depots. Criteria should be established that ensure a level playing field, and any depot meeting criteria should be funded, regardless of type of ownership.<sup>^\*</sup>
- Elimination of fees for depot collection of fibre and plastic containers will not be well received by residents and will likely force closures.\*<sup>^</sup>
- Calls to cancel Group 3 depots completely.\*<sup>^</sup>
- Preferential incentives for private depots are counter to the Stewardship Agencies of BC Action Plan to Enhance Extended Producer Responsibility in BC.
- These groupings are not compliant with SABC guidelines.
- Removing fibre incentives is abdicating Recycle BC's mandate in collecting residential PPP materials.<sup>^</sup>
- We fail to see how the reduction in incentives for paper and containers will change behavior. If depots stopped accepting this material, citizens would be paying the same amount of taxes and see a direct reduction in their service, leading to political backlash. The tonnages collected at depots along with low contamination rates, attests to the clear need and desire for public access to depots.
- If incentives are removed for Group 3 depots, a continuous improvement fund should be set up that local governments can apply for. Other stewards help fund capital investment.
- Local governments have made facility investments to further waste diversion, and to meet Recycle BC standards. This provides an opportunity to drop off material that exceeds size or quantity of curbside collection. Proposed changes will impact this collection.
- Our regional district has been working through education and outreach to encourage citizens to recycle only PPP at the curb to reduce contamination, but that all waste is accepted at depots. We cannot stop accepting PPP at our depots.
- Residents with curbside service require depots from time to time, particularly around Christmas, when moving, or during extreme weather conditions.
- Our regional district currently has multi-family residents who do not have access to curbside collection and rely on our depot for recycling. Proposed changes may prevent this.
- Our key take away on this topic is that Recycle BC values private depots over municipal depots.
- Appears as though Recycle BC hasn't researched why residents use depots. This should be done before describing depots as competition duplicating curbside service.

\*Several votes of agreement at consultation session.

<sup>^</sup> Repeated comment and/or submission.

\*\* High number of votes of agreement and/or consistently repeated comments/submissions.

### Promotion and Education, Logo Use Requirements

- No objection to use of Recycle BC logo so long as it does not place a greater burden on municipality. Concern about the use of logo should it not outlive the life of the asset.<sup>^</sup>
- We are currently the only ones advertising for Recycle BC depots. Who should cover this cost? Other municipalities may run Recycle BC depots in their area, but we don't. Perhaps greater incentives needed for this situation, or further requirement for depots to advertise.
- Request for online certification for depot staff training to ensure that staff are able to provide proper information to residents, and maintain consistent messaging.\*\*
- Other requests for additional educational tools for depot staff.\*\*

### Material Storage and Staffing Requirements

- We do not support requirement to store material so that quality is not impacted by inclement weather. The proposed language is broad and does not provide a mechanism for dispute resolution.
- Instead of requiring roofs or covers, perhaps Recycle BC could work with depot operators where there are issues to collectively address the problem.
- If required to cover/protect materials, provide alternative collection bins or subsidy/loan for construction.\*
- Regarding responsibilities of depot staff to check containers regularly, remove improperly stored material and communicate with customers: we recognize the importance of this issue and take appropriate measures when required. Requirement is too prescriptive, interferes with operations.

### Reporting and Working with Green by Nature

- Concerns about unequal service from Green by Nature (GBN), some depots having capital investment covered and others not.
- 3-way communication with Recycle BC and GBN is difficult. Depots need contract clarity, better relationship with GBN.
- Difficulty with reporting requirements between different formats of Recycle BC and GBN. Recycle BC should work with GBN to harmonize reporting.
- Depot EFT reporting: frequency is too high, would rather see monthly reporting.
- Please implement an online portal system where shipment weights, payments, audits etc. can be tracked so depots can check their data rather than individually tracking shipments and payments.

### Other Questions and Comments

- All Encorp depots should have the opportunity to participate in this program.\*
- Re-assess "access to a depot." 98% of the province having access is not realistic or believable. Many in smaller communities do not have vehicles or public transit. Access to depot should be assessed at a regional level not provincial.\*\*
- Depots would like a stronger partnership with Recycle BC- more focus on depots.
- Our community members want to recycle. They honour the first two aspirations of the prevention hierarchy. In your mission statement you pledge to "be a trusted environmental advocate and

\*Several votes of agreement at consultation session.

<sup>^</sup> Repeated comment and/or submission.

\*\* High number of votes of agreement and/or consistently repeated comments/submissions.

community partner offering equitable, effective and efficient residential recycling services”. Our citizens deserve equal opportunity to recycling as other provincial citizens.

- Health and safety concern about glass; should have glass-specific mega bags.
- Through the incentive rate debates, we must not lose sight of the pollution prevention hierarchy.
- Recycle BC’s long-term plans for depots: will the number of depots expand?
- Requests for Recycle BC staff to spend more time at depots.\*^



\*Several votes of agreement at consultation session.

^ Repeated comment and/or submission.

\*\* High number of votes of agreement and/or consistently repeated comments/submissions.

## Three Years of Recycle BC Data – Workshop Feedback

### Workshop Purpose

- To review Recycle BC's program performance from 2014 to 2016 as shown through key metrics and scorecards.
- To discuss findings and implications of these metrics, and explore the feasibility of additional recycling performance indicators.

### What We Heard at the Consultation Sessions and During the Written Feedback Period

#### Strengths

- It's great to see the amount of data that has been gathered; great to see data being taken seriously.
- We like all the data so we can pick and choose for reports to council.

#### Communication of Data

- Concerns that not enough detailed information is being provided, and data is not provided quickly enough to allow for proper response.<sup>^</sup>
- Requests for individual data pack information more often.\*
- Please stop sending us excel spreadsheets of data that each depot/collector has to individually manage.
- Recycle BC should create or borrow a platform to create a backdoor online portal to provide data monthly where collectors can self-serve.\*
- More frequent communication of collection data – monthly or weekly.<sup>^</sup>

#### Collection and Recovery Rates

- Analysis of the single family and multi-family garbage streams suggest 30kg per capita of residential PPP could be misplaced in garbage stream each year. If Recycle BC is recovering 40.7kg of residential PPP per capita, the recovery rate could be as low as 57%, rather than reported 78% rate. This information should be reviewed to determine what additional materials could be recovered.\*
- Request for amount of PPP distributed in BC compared to how much PPP is being recovered through Recycle BC EPR program (by type), by location.\*
- Assess collection and diversion rates on a regional basis and per regional district. Provincial numbers do not adequately represent service levels in most communities outside the lower mainland.\*<sup>^</sup>
- Provide amount and composition of PPP recovered in each municipality (i.e. total tonnage collected by city from all depots, from all curbside, and all multi-family in that city). Will help to understand residential compliance and participation levels and staff planning.<sup>^</sup>
- Compare communities with similar dynamics across all data sets to help develop best practices, share knowledge, benchmarking.<sup>^</sup>
- Provide tonnage per capita, not per household- households are a business construct but don't relate to actual performance. Per capita is a more accurate representation of individual human behavior, to help us drive behavior.<sup>^</sup>

\*Several votes of agreement at consultation session.

<sup>^</sup> Repeated comment and/or submission.

\*\* High number of votes of agreement and/or consistently repeated comments/submissions.



- Provide some analysis on urban versus rural contamination comparisons.\*
- How many tonnes (for each category) of foam packaging of soft plastic, and of multi-laminated packaging are used in BC annually? For each of these three categories, how many tonnes are recovered by Recycle BC?

### Material Marketing and End of Life

- Materials by weight compared to materials by value. A monthly graphic will provide quick understanding of effort versus value. This would help improve efficiency (best use of staff resources, how to improve recycling behaviors and target communication for staff training).^
- Would like more information about end of life of different material types to develop interventions to improve recovery.
- Would like a further breakdown of end of life data (i.e. high vs low value end markets/extent to which replaces use of virgin material/open vs closed loop recycling).\*
- Is recovery rate all recycled? How much is recycled and how much is disposed? How much will become engineered fuel?

### Composition Audits Results

- Request for audit data more often and as completed. Please include truck numbers so we can follow up with specific routes. Include data on what specific materials are to help us target education, and use positive reinforcement when necessary.\*^
- Request for data from all the audits that go into our scorecards, not just bad ones.

### Depots

- Provide individual depot capture rates (by material volume).^
- Provide average population per depot service area broken down by private and local government public depots.^
- Would like to see the source location/address of the person dropping off recycling. This will provide key data with respect to whether people who have curbside service are using depots to drop PPP.
- Please provide capture rate for foam packaging at depots with curbside versus depots without curbside. This will help understand role of depots in locations without other recycling options, and the relative success of different types of depots.

### Other Requested Data or Metrics

- Data related to customer response about the program/results of required customer service reports. What are people asking about recycling?
- Best collectors by quality and quantity (ask the collector if you can share their info publically), to help us develop best practices.
- As a new community to the program, we would like to learn how multi-family and curbside tonnages are determined when the materials are mixed in trucks

\*Several votes of agreement at consultation session.

^ Repeated comment and/or submission.

\*\* High number of votes of agreement and/or consistently repeated comments/submissions.



## Contamination – Workshop Feedback

### Workshop Purpose

- To present a detailed view of contamination as represented by three years of data.
- To discuss findings for non-packaging and printed paper and non-targeted material in the Recycle BC collection network.
- To use presentations by collectors on best practices as a springboard for brainstorming effective strategies to reduce contamination, including public outreach, education, and on-the-ground monitoring.

### What We Heard at the Consultation Session and During the Written Feedback Period

#### Thresholds and Recovery Levels

- Calls to eliminate the 3% threshold. Thresholds should vary based on demographics, collection system, and contamination reduction methods.\*^ Providing a hard percentage target implies contamination is 100% controlled by collector.
- Concern with how contamination is calculated: would be better to have a weighting mechanism to materials such that contamination rates better reflect level of contamination by incorporating volume, weight, item count and severity.^\*
- How was 3% contamination rate determined?^\*
- Current contamination targets are difficult to achieve and proposed revisions will require increased education and costs for municipalities. Recommendation that curbside contamination threshold be adjusted to more attainable levels.\*
- Despite significant education efforts by our city, confusion still exists around items that are recyclable and those that are not. Suggestion that items that are recyclable but not part of Recycle BC program should not be counted as contamination as it is often producers that label items as recyclable.
- Amend program to accept all recyclables, will increase recovery levels and reduce contamination.\*
- Incentivize low contamination rates with bonuses.^
- Introduce fines for contamination; allow processors to impose fines.^
- Support proposal for cross-contamination thresholds (multi-stream and segregated glass). We encourage Recycle BC to revise the definition of non-targeted material to include cross-contaminated PPP.
- Encourage Recycle BC to frame contamination conversation around non-targeted materials rather than non-PPP, particularly when discussing operational performance. Non-targeted is more accurate and real reflection of operational environments.

#### Audits

- Requests for more timely and detailed data and feedback.^\*

\*Several votes of agreement at consultation session.

^ Repeated comment and/or submission.

\*\* High number of votes of agreement and/or consistently repeated comments/submissions.

- Would like more transparency around waste audit procedures: Would like feedback on contamination types identified in waste audits within streams. Better flow of information to allow collectors to act quickly and identify specific areas/buildings for education/enforcement.^
- Contract independent auditors. Conflict with Recycle BC conducting their own; Allow collectors to attend audits on request.^

## Materials

- Soft plastics need higher producer fees. Workshop revealed that miss-sorted plastic bags cause sorting lines to shut down 25% of time.
- Concerns about film being difficult to process and sort, confusing for residents.^ Feasibility of having a separate stream for film?
- Come up with ways to make it easier to recycle film, glass and foam packaging. Many people will not take these to a depot- difficult for seniors.
- Frustration that money is spent researching hard to recycle plastics instead of changing what is allowed in the market.^
- Recycle BC should use influence as an industry organization to steer manufacturers away from products that contaminate the recycling stream.^\*

## Other Suggestions and Requests

- One contamination reduction strategy is to witness material delivery at receiving facilities. It would be helpful to be able to observe delivery without requiring a Recycle BC escort.
- Requests for clarification on future plans for shredded paper rules (paper bags versus clear plastic bags).\*
- Requests to allow load rejection by processors and increased funding for curbside enforcement.^
- Create a gold star program for high performing programs.\*
- We feel supported by Recycle BC in contamination reduction efforts, continued support by field representatives is important to us.
- Recycle BC to help facilitate improved relationships between local governments and collectors doing similar collection.
- Hire ambassadors, province-wide outreach from Recycle BC, similar to BC Hydro. Use summer students to help with inspection programs.\*
- Requests for a breakdown of contamination materials showing volume, weight, and count, instead of just a percentage, to enable focused education.^
- What is the true cost of contamination? Instead of threshold, provide market value.
- Requests for data showing: Top 5 or 10 contaminants as well as the percentage or tonnage of non-targeted PPP; Contamination rates per household; Contamination rates for depot service only versus curbside collection.

\*Several votes of agreement at consultation session.

^ Repeated comment and/or submission.

\*\* High number of votes of agreement and/or consistently repeated comments/submissions.



## Streetscape Recycling – Workshop Feedback

### Workshop Purpose

- To review and discuss the findings from Recycle BC's past streetscape collection pilots.
- To review and discuss the design implication of streetscape collection containers and other program attributes.
- To discuss the proposed Recycle BC program for streetscape collection of packaging and printed paper in BC, including mandatory requirements and incentive rates.

### What We Heard at the Consultation Session and During the Written Feedback Period

#### Proposed Incentive Offer

- The proposed incentives are far too insufficient and will not cover the cost of PPP collection from streetscapes, or administrative efforts.\*\* The proposal will not encourage municipalities to sign on.
- The PPP stewardship plan commits to providing a market-clearing price. What happens if \$400/tonne doesn't clear the market? Will Recycle BC offer a price that clears in order to comply with the plan?
- Our 12-month pilot indicates the costs will be \$6500/tonne for streetscape collection and setup (not including other more difficult public realm areas such as parkscape).
- Recommend an incentive amount per household or per capita.
- Allow communities with single stream streetscape recycling to share audit data to determine if recovery rates and contamination rates are comparable to multi-stream. If they're comparable then offer a market-clearing price for single stream streetscape recycling.^
- Yearly audits should be funded by Recycle BC.
- Reporting is too onerous based on proposed financial incentive.

#### Proposed Streetscape Program Design

- Preference for optional participation in the program, providing adequate time to implement streetscape collection along with our other regional initiatives towards source separation and increased diversion.
- We agree with the proposal's collection method and container design and colors. Our pilots indicate that a 3 stream (containers, paper, garbage) container is the best for obtaining cleanest products.
- Plan requires municipalities to purchase containers. Requiring taxpayers to front the funds to get a provincially mandated EPR program established while also paying at the retail stores doesn't seem correct.^
- Issue of organics: compostable packaging is a reality that will need to be dealt with.
- Collaborate and support municipalities already executing programs. Treat us as partners, learn from our findings.\*
- Would like to see a standardized province-wide or regional system developed (bins, icons, locations).\*^

\*Several votes of agreement at consultation session.

^ Repeated comment and/or submission.

\*\* High number of votes of agreement and/or consistently repeated comments/submissions.



- Questioning inclusion of liquids in reported weights on collection containers and impact on contamination rates.
- Questioning how capture and diversion rates were calculated.

### Streetscape Bin Design

- Streetscape collection is important tool for many communities, particularly those with high tourism. Need to ensure collection bins are designed to be wildlife proof, preventing wildlife from gaining access to waste material.
- Requiring municipalities to have certain bins will exclude a number of municipalities from participating. Recycle BC should work with local governments to determine an approach to developing a streetscapes program that is inclusive of all communities.^
- As long as contamination rules are complied with, communities should be able to determine what waste stream should be collected at each streetscape location, and how bin systems are configured. Flexibility should be given to comingle, segregate, or not include a waste stream in a given location.^

### Program Plan Comments

- Recycle BC's position only focuses on streetscape collection adjacent to residential areas. This is inconsistent with the Recycling Regulation requirement to collect PPP from municipal property including public roadways, public parks, and others.^\*
- The plan doesn't address need for continued and comprehensive public education around the need to recycle properly in the public realm.^  
The proposal seeks to offload processing and marketing requirements to collectors rather than using existing post-collection services. If no LG agrees to accept the offer, will the Ministry view this as non-compliance?
- Plan doesn't address recycling alternatives such as reducing or reusing packaging. Plan should consider opportunities to avoid the need for recycling in the first place and avoid or reduce single-use items being sold by retailers such as disposable cups, take-out containers, and bags.
- Local governments collecting small volumes would need to arrange their own processing contracts.
- Organizing and managing processing and marketing contracts on a larger scale would result in economies of scale, increased management/operating efficiencies and harmonization.
- Spirit of the program is to take responsibility off municipalities and tax payers, proposal seems to veer away from this.
- Blue box began in 1990s- success today is as a result of sustained effort. Streetscape will not be an overnight success but will take work and will pay off over time.\*

**Note: Since the November consultation, a new challenge for streetscape collection and recycling services has emerged: the China ban and global tightening of market specifications. For example, China requires material to have no more than 0.5% contamination with zero tolerance for targeted contamination such as organics; streetscape has greater than 30% contamination. As Recycle BC's pilot studies showed, PPP material can be collected but it is poorly sorted by the user, heavily contaminated, wet with residual liquids, and unclean with food waste. Hazardous material can also be present. It may be that streetscape PPP collection is non-recoverable under current market conditions.**

\*Several votes of agreement at consultation session.

^ Repeated comment and/or submission.

\*\* High number of votes of agreement and/or consistently repeated comments/submissions.

## Research and Development: Other Flexible Plastic Packaging – Workshop Feedback

### Workshop Purpose

- To introduce the new Recycle BC other flexible plastic packaging (multi-laminated plastics) collection program.
- To discuss how residents and collectors will identify and sort this new category of plastic packaging.
- To present Merlin Plastic's research and development project for the processing of other flexible plastic packaging.

### What We Heard at the Consultation Session and During the Written Feedback Period

#### Workshop Exercise

##### Strengths and Benefits

Good to see Recycle BC take on one of the largest outstanding packaging streams, volunteer trial is a good idea; landfill diversion, keeping material out of ocean; consumer convenience; value for producers; less mining of resources; increases materials accepted into program; will increase consumer awareness of product types; investing in local infrastructure (Merlin Plastics).

##### Drawbacks

Significant space taken up at depots, need high quantities to justify cost/ higher incentive fees for depots, time intensive; requires significant education for depot operators and residents, residents may put in blue bins, doesn't promote change; may increase contamination levels; more sorting work for residents; confusing for residents; should instead pressure producers to create 100% recyclable; producers should pay for every step of process including research and development; what is option for areas where no depot exists?; may hurt public perception of Recycle BC.

##### Messaging and Sorting

Recycle BC will need to develop clear messaging, ad campaign; should be called "repurposing" not "recycling"; pointing residents towards research would help; need transparency; need clear distinction between film and multi-laminated plastics; use sounds, stretch and tear outreach on how to distinguish; training resources required; audits during trial period; what is acceptable contamination %?

### Research and Development Engineered Fuel Comments

- Concerns about the negative environmental and health impacts of burning alternative fuel, particularly in sensitive, confined airsheds.\*\*
- Questioning of the claimed environmental benefit of using the material in lieu of coal combustion. Our city has worked with similar air quality concerns, would like further opportunity to discuss the matter with Recycle BC.
- Recycle BC should ensure there is no net increase in air emissions related to alternative fuel. What is in remaining emissions after burning process?^

\*Several votes of agreement at consultation session.

^ Repeated comment and/or submission.

\*\* High number of votes of agreement and/or consistently repeated comments/submissions.

- Our regional district is a strong advocate for health of our residents as per our approved Solid Waste Management Plan. Allowing for any municipal solid waste from our region to be used as alternative fuel would violate our provincially approved plan.
- Requesting Recycle BC to share environmental and health impact assessments, and epidemiological studies used in decision making to use alternative fuel.^
- Request for plans to mediate or compensate health impacts to residents. We will highlight this requirement to the Ministry of Environment and Climate Change Strategy and the Ministry of Health. Can also provide these ministries with research pointing to negative impacts of using garbage as fuel and the inaccuracies of viewing it as a greener alternative than coal.
- Would like participation in alternative fuel to be optional to allow municipalities to decide if the program aligns with their strategic priorities and community values.
- Advocating for voluntary collection, not mandatory.^
- Seems like adding the flex stream is for meeting 2017 Ministry of Environment and Climate Change Strategy requirement to collect all packaging but if it isn't being recycled but used as a fuel source it doesn't fit with Recycle BC.

### Other Flexible Plastic Packaging - Supply to Market

- Pilot studies should be used to confirm recycling viability before adding new materials to the program to avoid materials being unnecessarily marketed as alternative fuel.
- Encourage Recycle BC to continue to work with suppliers and manufacturers to develop and use packaging that has viable recycling end markets.\*\*
- Waste to energy offers producers a non-recycling stream which must be discouraged. Producer payment for such materials should be increased substantially to discourage use of such materials. This option is being encouraged because it is cheaper (low-weight).\*\*
- Recycle BC and Ministry of Environment and Climate Change Strategy should place more effort on trying to limit the use of unrecyclable materials through disincentives or regulatory measures.\*\*
- Using garbage as fuel provides a disincentive to producers to modify product design. It also provides a disincentive for proper public outreach. The more residual material collected, the more fuel available for profit, leading to the commodification of these materials. This is not a zero waste practice or paradigm.^\*
- Encourage producers to adopt a logo to tell consumers how to sort; would money be better spent promoting consumers to purchase recyclable products?

### Resident Education

- Need to be transparent with residents that packing will be used as fuel. This is very different than current messaging.
- Lack of education on the issue, difficult for residents to distinguish various types of these materials.
- Need messaging to say that engineered fuel is part of a journey towards recyclability - it's a step in right direction.\*

**Note: Following consultation feedback the launch date for voluntary collection at depots of other flexible packaging has been moved to June 1, 2018 to facilitate more planning.**

\*Several votes of agreement at consultation session.

^ Repeated comment and/or submission.

\*\* High number of votes of agreement and/or consistently repeated comments/submissions.

## Marketing and Communications – Workshop Feedback

### Workshop Purpose

- To present a detailed overview of the new brand, its rationale and early results.
- To discuss challenges/opportunities with the new brand.
- To identify collector marketing and communications goals.
- To discuss existing communications and marketing support materials and how Recycle BC can support collector goals.
- To identify other materials that may be helpful or useful to support collector goals.

### What We Heard at the Consultation Session and During the Written Feedback Period

#### Positive Feedback

- Some great educational resources are available, informative website and social media site, great materials list, good reach and variety of campaign platforms.
- Our key takeaway is that partnerships and collaboration have emerged as a focus of Recycle BC. This conference is a good start. It hasn't felt this way in the past. Fingers crossed for more in the future.

#### The Brand

- The new brand is consistent, simple, clear and intuitive.\*
- Still confusion about who Recycle BC is. Logo suggests general/broad acceptance of recycling and all types of materials.\*
- Focus less on brand promotion and more on the recycling education.\*

#### Requested Materials and Initiatives

- Requests for further resources for promotion and education, training and various campaigns. Concern that funding is insufficient for long-term behavioral change and contamination reduction.\*\*
- Requests for comprehensive lists of what is and isn't accepted, and where things can be taken. Staff spending too much time looking this information up.\*\*
- Would like “face to face” communications educating residents, and providing training.\*
- Calls for Recycle BC to get into schools, develop material for children.\*^
- Current depot signage is inadequate, uninteresting, needs photos.\*
- Requests for more television and newspaper advertisements and webinars.\*^
- People are always interested in recycling processes, what things are made into, and why certain items cannot be recycled.\*
- Please do more to educate people about PPP and how EPR works. Help residents understand the difference between PPP and recycling, and why only certain materials are accepted at depots.\*^
- Recycle BC should provide province-wide standard promotion and education.\*^
- Would like Recycle BC to stop creating non-adaptable marketing materials, please provide templates.\*

\*Several votes of agreement at consultation session.

^ Repeated comment and/or submission.

\*\* High number of votes of agreement and/or consistently repeated comments/submissions.

- Requests for promotion and education on how to move away from non-recyclable materials, as well as educational pieces around multi-laminated and film plastics.\*
- Education campaigns on danger and other problems caused by non-targeted materials.
- A standardized education and outreach plan for the program to help local governments with their communications.

### Other Requests and Concerns

- Difficulty using Recycle BC files and the confusion it can cause residents in terms of understanding the various stewardship programs.\*
- Collectors wish to see their field service rep more often.\*
- Change wording from "approve" materials to "review, comment, collaborate".\*
- Too much focus on what is included in the program, more focus should be given to what shouldn't be in containers.
- Promotion and education needs to show residents that recycling isn't about convenience. We need to be truthful in informing them how to recycle correctly.
- Some local governments have been educating residents about recycling for 25 years, others just started curbside 3 years ago. Doesn't make sense to reinvent the wheel.
- Suggestion for Recycle BC to partner with other EPR programs to improve promotion and education.
- Promotion and education relies too heavily on online channels, should be more use of other media to distribute messages.
- Too much focus on curbside, not enough on depots.
- The Recycle BC app does not work and is not very useful.
- Request for focus groups/surveys of public habits including demographic information, to help with program planning and design, communications. Also helps inform where dollars should be spent.
- Participants identified items they would like to see from Recycle BC that are already available, or can be made available, indicating a simple communication issue.

### Marketing and Communication Comments Related to Contamination Workshop

- Our regional district has high contamination rates and our staff use much of their time sorting and meeting the needs of Recycle BC. Reducing contamination rates and encouraging the public to understand recycling rules requires sustained education and outreach. Our comprehensive education programs require more funds.^\*
- Request for detailed contamination reduction strategies for areas that have seen success. Was helpful to hear what other communities are doing in the contamination workshop, but a reference document would be helpful to help validate tactics.
- Would like to see education material about how contamination reduces operational efficiencies which municipalities can link to.
- Multi-family buildings: organize a positive reinforcement program that could recognize clean recycling buildings and "feature" buildings in each city annually. Encourage pride in buildings.
- Hold non-PPP events, allow residents an opportunity to dispose of contaminants.
- Hold zero waste challenges with intensive education.

\*Several votes of agreement at consultation session.

^ Repeated comment and/or submission.

\*\* High number of votes of agreement and/or consistently repeated comments/submissions.

## Summary of Consultation Feedback Themes

- Consistently repeated concern that incentives and top ups are insufficient for collection costs.
- Incentive rates should be indexed annually.
- Concerns about the impacts of the transition away from single-use bags on collection methodology, contract costs, and infrastructure costs.
- Concern and frustration that rural depots are not receiving fair incentive and baling rates.
- Concerns about the uneven playing field created by depot categorization, and calls to remove Group 3 depot category.
- Requests for depot staff training and educational tools.
- Questions and concerns about the proposal to reduce the incentive rate for multi-family buildings that do not collect OCC under the Recycle BC program.
- Concerns about unique needs of and challenges for rural areas.
- Strong concerns about program entrance requirements creating barriers for rural areas whose residents deserve equal access to recycling.
- Requests for increased funding for contamination reduction and promotion and education efforts.
- Various concerns and requests around contamination thresholds and targets.
- Collectors are interested in and challenged by contamination, want to learn more about successful approaches. Successful programs want to be acknowledged.
- Requests for more timely and detailed data and feedback on performance and more frequency and transparency of audits.
- Hope for a more favorable streetscape program proposal including better assessment of program costs, methods of reducing contamination, container styles, funding mechanisms and alternate approaches for dealing with some materials.
- 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, public parks, and others.
- Support for Recycle BC taking on one of the largest outstanding packaging streams: multi-laminated plastics- through a volunteer trial.
- Consistently repeated concerns about the negative environmental and health impacts of burning alternative fuel, particularly in sensitive, confined airsheds.
- Concerns about difficult to recycle or unrecyclable materials. Calls for Recycle BC to pressure producers to change material choices or pay higher stewardship fees.
- Recycle BC should collaborate with the Province to include ICI material in the program, as well as non-PPP recyclable materials.
- Program plan should include focus on packaging redesign and the need to ensure that Recycle BC encourages reduction and reuse as required by the Recycling Regulation.
- Repeated calls for evidence-based decision making. Requests for research and best practices to be provided to justify proposed changes.

\*Several votes of agreement at consultation session.

^ Repeated comment and/or submission.

\*\* High number of votes of agreement and/or consistently repeated comments/submissions.



## Next Steps

Thank you for providing your feedback during the consultation process. The next steps of the consultation process are outlined below:







## Packaging and Paper Product Collection Costs

### Five Year Cost Study Refresh

The Packaging and Paper Product (PPP) Stewardship Plan<sup>1</sup> delivers PPP collection services by providing opportunity for those involved in the collection of PPP to provide services directly to their residents and customers<sup>2</sup>. Qualified collectors are offered financial incentives for PPP collection services. In 2013, research into PPP collection costs was completed to assist in the setting of the financial incentive values so that they act as market-clearing prices<sup>3</sup>. Collection costs for curbside, multi-family and depot collection were studied. Costs for both promotion and education (P&E) and service administration were also reviewed. This study is a refresh of the 2013 study.

#### Cost Study Purpose

The purpose of this study was to determine current collection costs and to compare the current costs to those costs from five years earlier.

- The first cost study occurred in Q1 2013 and used 2012 collection cost data,
- This cost study occurred in Q1 2018 and used 2017 collection cost data.

This research into packaging and paper collection costs was completed to assist in the setting of financial incentive values, originally for the 2014 Services Agreements and now for the new Services Agreements being issued in 2018.

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<sup>1</sup> Available via the Recycle BC website at [https://recyclebc.ca/stewards/regulation\\_and\\_stewardship\\_plan/](https://recyclebc.ca/stewards/regulation_and_stewardship_plan/)

<sup>2</sup> The financial incentive is offered for collection services. Collection services are distinct from post-collection services which include receiving PPP from collection vehicles, picking up PPP from depots, consolidation and transfer where required, and processing and marketing of PPP.

<sup>3</sup> A market-clearing price is a payment available to collection service providers (subject to executing an agreement to provide the collection service, complying with the collector qualification standard on a continuous basis, and reporting specified data on a defined schedule) designed to stimulate collection activities such that the quantity supplied is equal to the quantity demanded.

## Study Methodology, 2018

Local governments, including both Regional Districts and Municipalities that participated in the 2013 study were requested to provide collection cost data to the same third-party accountant who performed the 2013 study.

Where Recycle BC now provides collection services directly, the 2017 collection cost data was provided to this independent accounting firm by Recycle BC. Collection costs for curbside, multi-family and depot collection were studied. Promotion and education (P&E) and service administration were also reviewed.

## Study Size

In 2013, collection cost data was requested from 25 local governments. 23 chose to submit data. In 2018, collection cost data was requested from the same 23 locations which equates to 25 collectors due to changes to some local government collection structures and the mix of Recycle BC direct service and local government depot service in some communities.

- Of the 25 local governments requested to provide cost data, 12 submitted data.
- Including the 5 locations with data supplied by Recycle BC, there were a total of 17 locations included in the 2017 data.

The difference in the data sets collected by cost category between the two studies is:

Collection Cost Category	2013 Participation	2018 Participation
Curbside Collection Costs	13	11
Multi-Family Collection Costs	8	5
Depot Collection Costs	16	8
P&E Costs	23	17
Service Administration Costs	23	17

This lack of participation, and limited data set, led the accounting firm to suggest that the data must be used with caution.

## Data Collection Methodology

In early January 2018, local governments were sent a letter from Recycle BC requesting their participation. The local governments were then sent a data collection spreadsheet as well as a guideline document.

Collection costs include both operating and capital costs. Operating costs requested were actual 2017 expenditures. For capital costs, participants were requested to identify all capital assets used in providing the services that had been acquired by the collector within defined lifespans of the assets. These assets were then amortized over the assumed lifespan. No costs

were included for land costs since it is accepted that land does not depreciate. A cost of capital was calculated based on historical interest rates, the year of purchase and the unamortized value of the asset at the start of 2017. No cost of capital was included for any land costs

Meetings with the independent accountant were arranged in January, February and March. All locations – except one – agreed to provide data. Subsequent to the meetings, the local governments submitted their cost spreadsheets. The data was reviewed and various questions asked for clarification. Key indicators were calculated for the summary.

## Five Year Cost Study Refresh Results

### Curbside Collection

Based on the responses received, 11 curbside collection programs were studied in 2018.

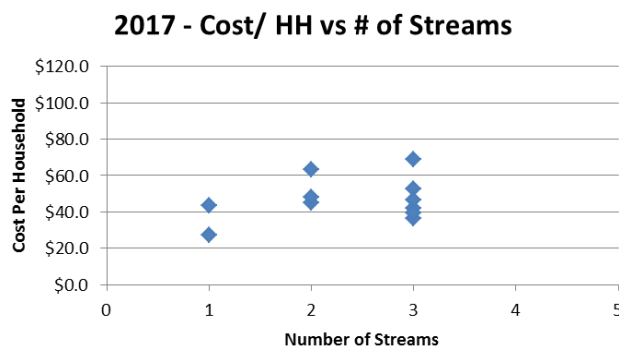
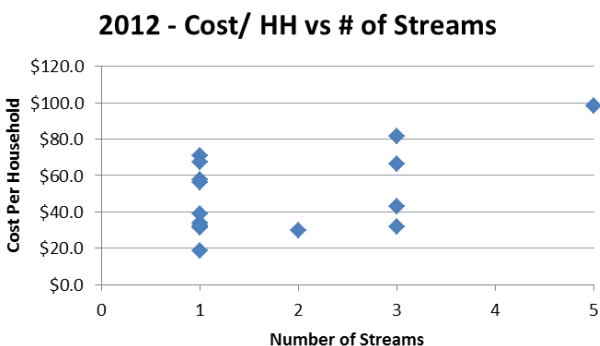
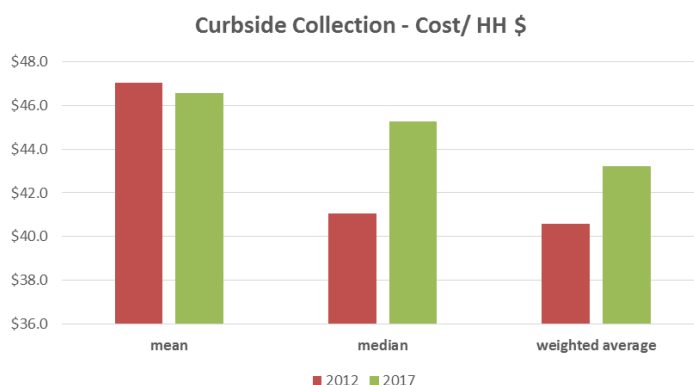
Diversion in 2017 ranged from 42 Kg/HH to 200 Kg/HH. Diversion in 2012 was from 48 Kg/HH to 270 Kg/HH.

Cost/HH in 2017 ranged from \$27 to \$69 (cost/HH in 2012 was from \$19 - \$98).

- Mean<sup>4</sup> \$47
- Median<sup>5</sup> \$45
- Weighted average by HH<sup>6</sup> \$43

The five-year change in cost/HH ranged from a decrease of 55% to an increase of 156%.

- Mean -1%
- Median 10%
- Weighted Average 6%



<sup>4</sup> Mean: the average of the numbers

<sup>5</sup> Median: the middle number in a list of sorted numbers

<sup>6</sup> Weighted Average: the mean in which each item being averaged is multiplied by a number (weight) based on the item's relative importance (in this case, number of households).

## Multi-Family Collection

Based on the responses received, 5 multi-family collection programs were studied in 2018.

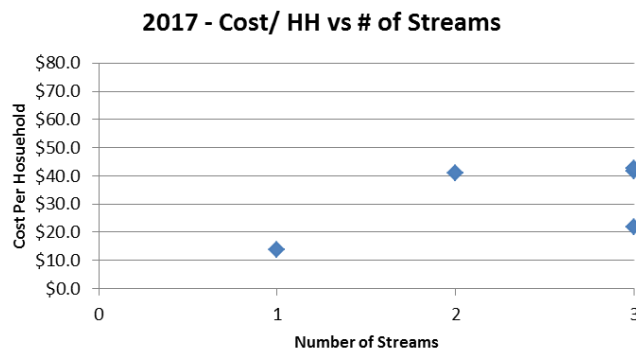
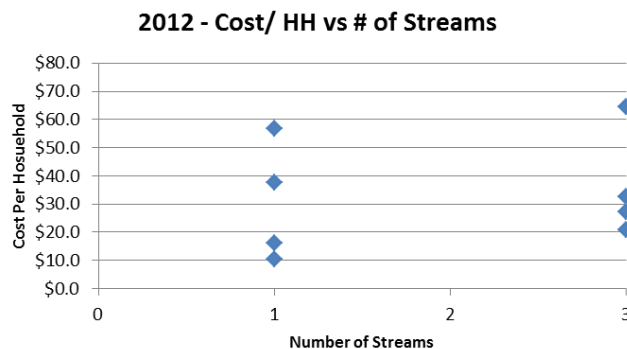
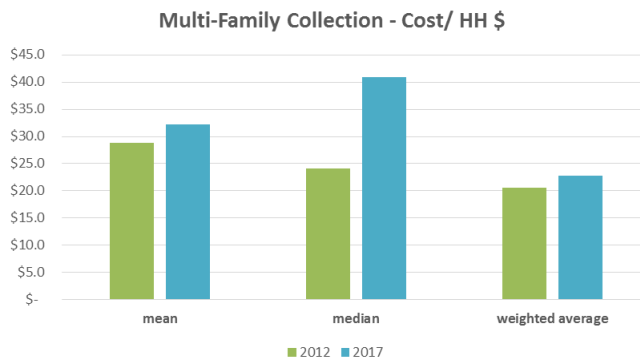
Diversion in 2017 ranged from 67 Kg/HH to 91 Kg/HH. Diversion in 2012 was from 73 Kg/HH to 136 Kg/HH).

Cost/HH in 2017 ranged from \$14 to \$43 (cost/HH in 2012 was from \$10 to \$65).

- Mean \$32
- Median \$41
- Weighted average by HH \$23

The five-year change in cost/HH ranged from a decrease of 28% to an increase of 56%.

- Mean 11%
- Median 70%
- Weighted Average 11%



## Depot Collection

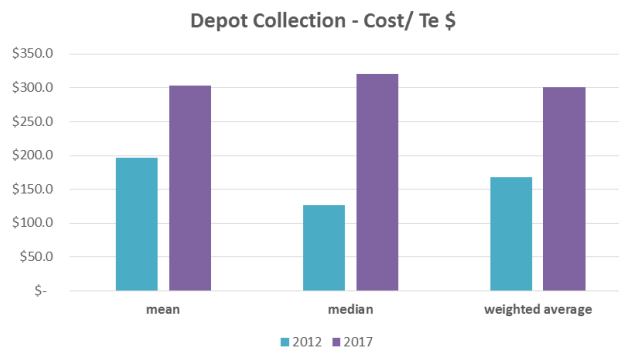
Based on the responses received, 8 depot collection programs were studied in 2018.

Cost/tonne in 2017 ranged from \$148 to \$420 (cost/tonne in 2012 was from \$37 to \$595).

- Mean \$304
- Median \$320
- Weighted average by HH \$301

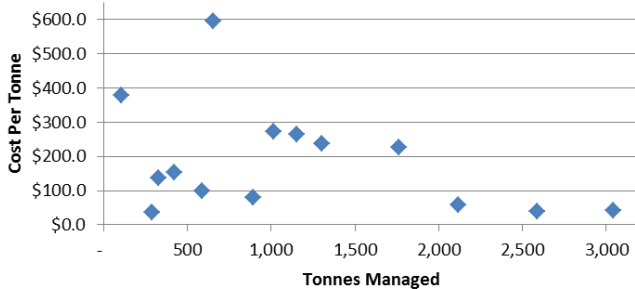
The five-year change in cost/tonne ranged from a decrease of 30% to an increase of 383%

- Mean 54%
- Median 153%
- Weighted Average 79%

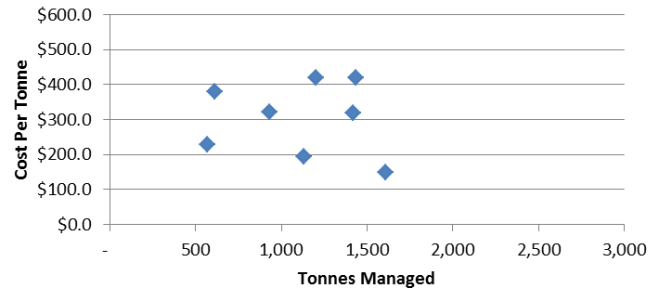


The substantial increase in costs appears to be attributable to a shift from unstaffed depots to staffed depots.

**2012 - Cost per Tonne vs Tonnes Managed**



**2017 - Cost per Tonne vs Tonnes Managed**



## Promotion and Education

Based on the responses received, 17 locations' data were studied in 2018.

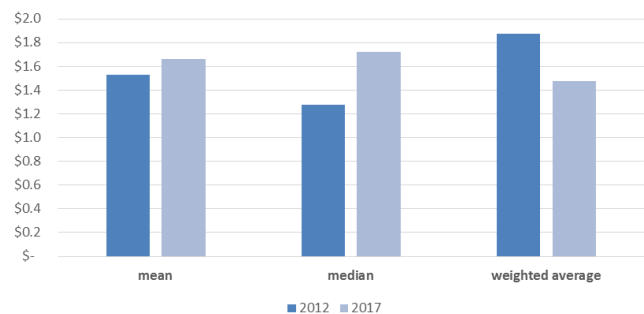
Cost/HH in 2017 ranged from \$0.02 to \$7 (cost/HH in 2012 was from \$0.24 to \$11).

- Mean \$1.70
- Median \$1.70
- Weighted average by HH \$1.50

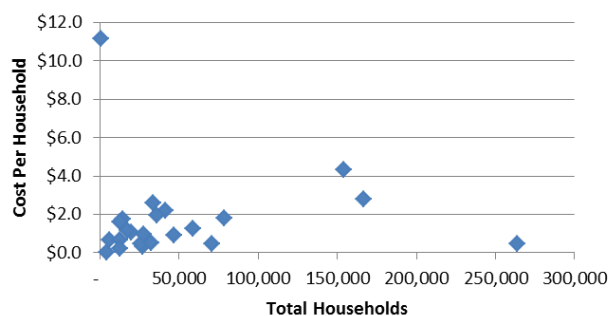
The five-year change in cost/HH ranged from a decrease of 98% to an increase of >2700%

- Weighted Average -39%

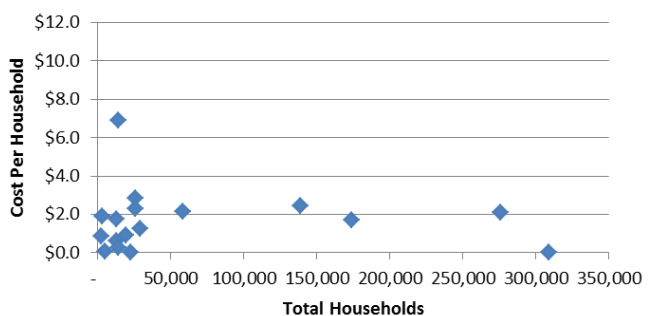
**P & E - Cost/ HH \$**



**2012 - P&E Cost/ HH vs Households**



**2017 - P&E Cost/ HH vs Households**



## Service Administration

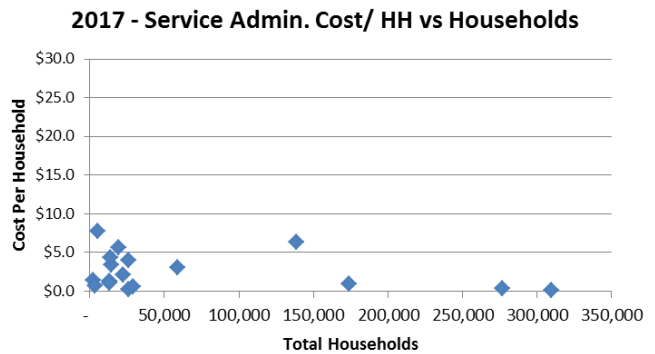
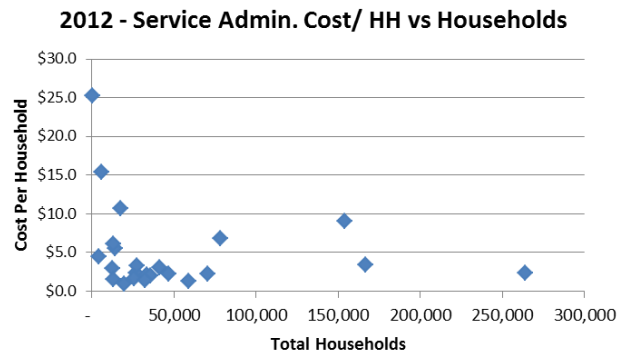
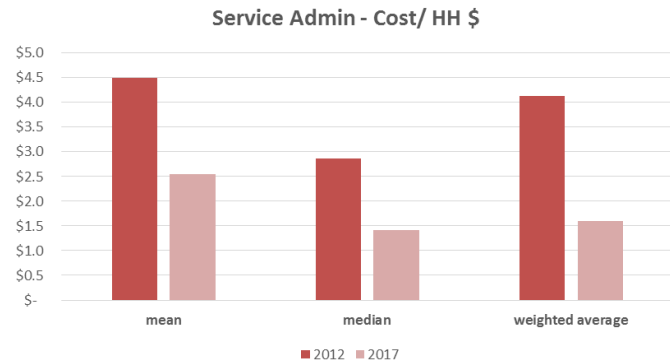
Based on the responses received, 17 locations' data were studied in 2018.

Cost/HH in 2017 ranged from \$0.18 to \$8 (cost/HH in 2012 was from \$0.91 to \$25).

- Mean \$2.50
- Median \$1.40
- Weighted average by HH \$1.60

The five-year change in cost/HH ranged from a decrease of 96% to an increase of 142%

- Weighted Average -62%





# **Consultation Report on Revised Packaging and Paper Product Extended Producer Responsibility Plan**

October, 2018

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## Part 1: Introduction to Consultation and Engagement Approach

### 1.1 Regulatory Context

Section 6 of the [BC Recycling Regulation](#) requires that every five years Recycle BC review its approved program plan and submit proposed amendments to the BC government for review and approval. An important part of the review of the program plan is stakeholder consultation to ensure there is a clear and transparent process for engaging stakeholders in the review process. The [Recycling Regulation Guide](#) provides direction on the essential components of a stakeholder engagement and consultation process followed by Recycle BC, as outlined below.

### 1.2 Report Purpose and Overview of Consultation Process

#### 1.2.1 Consultation Report Purpose

The purpose of this consultation report is to describe the process undertaken by Recycle BC to consult with key stakeholders on the revised program plan; summarize the feedback received from stakeholders; and demonstrate how the feedback was considered in finalizing the program plan. The [Submission Checklist for Product Stewardship Plans Under the Recycling Regulation](#) provides a detailed guidance on what should be included in a consultation report and has been referenced in the preparation of this report:

- A summary of what was heard through the consultation process and how the plan will or will not address these comments or issues;
- When and where the consultation meetings/webinars were held, the number of people that attended and the sectors represented at the meetings;
- How Recycle BC engaged a cross-section of identified stakeholders;
- The materials shared with stakeholders allowing them to easily identify the implication of the plan to their interests and organizations; and
- How Recycle BC provided effective and timely notice of consultation opportunities and the amount of time provided for stakeholders to respond to the draft program plan.

#### 1.2.2 Overview of Consultation Process

Recycle BC undertook a thorough consultation with stakeholders on the revised program plan in line with the requirements for consultation in the Recycling Regulation 5 (1)(b) and in the [Recycling Regulation Guide](#). In accordance with these documents, the stakeholder consultation process was designed to achieve the following:

- Engagement of a full cross-section of stakeholder groups, including: industry affected by or with an interest in the operation of the stewardship plan (retailers, service providers, brand-owners), local government representatives, public interest groups, members of the public and/or consumers that will make use of the stewardship program;
- Effective and timely notification of consultation opportunities;
- Distribution of materials that would allow stakeholders to determine the implications of the updated program plan to their interests and organizations;
- Provide adequate time for stakeholders to respond to draft documents; and
- Provide a consultation report available for public review that documents the consultation process and outlines how stakeholder input was addressed in the program plan.

Consultation occurred in two phases:

- **Phase One** consisted of stakeholder workshops in November 2017, followed by a draft version of the program plan being provided to stakeholders for review and comment in early April supported by a stakeholder webinar and in-person meetings held in mid-April and early May.
- **Phase Two** consisted of a substantially revised program plan being provided to stakeholders in early July, with meetings to review and discuss the revised plan held in mid July. Stakeholders were asked to review the revised plan and provide comment by early September.

More details about each phase of the consultation process are provided below.

### **1.2.3 Phase One Consultations**

In November, 2017, Recycle BC began the consultation process with a two-day series of workshops covering the following topics:

- 3 years of data
- Curbside collection
- Multi-family collection
- Depot collection
- Contamination
- Research and development: Other Flexible Plastic Packaging
- Streetscape
- Marketing and communications
- Program plan updates

Feedback from these workshops was summarized in a consultation report available [here](#). The feedback and discussions from the two-day workshop were considered in preparing the revised program plan which was presented to stakeholders at a webinar on April 17, 2018, at which time Recycle BC reviewed the key components of the draft plan and solicited their feedback. In May, Recycle BC held additional consultation meetings with local communities. One meeting was hosted by Metro Vancouver (May 9) and another was conducted as part of the Recycling Council of British Columbia (RCBC) conference (May 30).

Stakeholder feedback received during Phase One consultations, along with counsel from the BC Ministry of Environment and Climate Change Strategy (MoECCS), indicated that the revised program plan, as drafted, did not sufficiently demonstrate how Recycle BC intended to pursue a program of continuous improvement over its next five years of operation. Nor did it demonstrate sufficient leadership in light of increasing awareness of the global plastics pollution problem and recent actions by the European Union (EU) to set ambitious material-specific recycling targets for plastics. At the June, 2018 G7 Summit in Quebec, Canada tabled a Plastics Charter that also set ambitious plastic recovery and recycling targets. These targets are consistent with recent actions taken by the EU to set material-specific targets for plastics and other materials. Also, in recent months, many of Recycle BC's largest members have publicly announced commitments to achieve 100% recyclable packaging within the next five to seven years. In light of these recent developments and in response to stakeholder feedback including that received from the MoECCS, Recycle BC made substantive updates to its draft program plan. Some of the key updates include:

- An increased general recovery rate;
- Material-specific targets for plastics, metal, glass, and paper; and

- A broadened scope of obligated material to include packaging-like products and single-use plastic products such as drinking straws, plastic cutlery, etc.

#### **1.2.4 Phase Two Consultations**

After review and approval by the Recycle BC Board of Directors, the updated draft program plan was posted on the Recycle BC website on July 12, 2018. Invitations were sent to 1,574 stakeholders on June 27, 2018 inviting them to attend a meeting either in-person or via webinar to review the key elements of the updated program plan. A full list of communications sent to stakeholders, the distribution lists for these communications as well as a full list of all the organizations that participated in these three meetings are provided in [Appendix A](#).

Phase Two Consultations consisted of three meetings targeting different stakeholder groups were held in North Vancouver on July 17, 18 and 19, 2018, as described below:

- The July 17, 2018 meeting was designed for the steward community. 1,343 members of the steward community were invited to attend, including industry associations. Five organizations participated in person in Vancouver and 74 joined by webcast.
- The July 18<sup>th</sup> meeting was held for collectors, local governments and First Nations communities. 193 stakeholders were invited to join the meeting. Nine attended the meeting in Vancouver and 63 joined by webcast.
- The July 19, 2018 meeting was held for the ENGO community. Twenty organizations were invited. Three participants joined that session.
- A recording of the meetings, the material presented as well as a Q&A document for each meeting were posted on the Recycle BC website and emails were sent to all stakeholders advising them of the availability of these materials and inviting them to provide feedback on the updated plan by September 6, 2018.
- Appendix B provides links to the presentations from each meeting as well as the Q&A documents that summarize the questions asked and answers provided at each meeting.
- Stakeholders were given 45 days to review the plan together with presentation materials and to provide their feedback to Recycle BC. Appendix C of the stakeholder report provides all written submissions received from stakeholders.

## Part 2: Stakeholder Engagement

Consultation on the updated program plan was directed at five primary stakeholder groups: stewards, local governments, collectors and other service providers, First Nations communities and environmental non-governmental groups. Recycle BC received 29 written submissions from stakeholders, all of which can be found at Appendix C of this report.

### 2.1 Steward Community

Stewards have financial and operational responsibility for the packaging and paper product recycling services provided to the residents of British Columbia. Stewards' points of view are also represented by their steward associations and/or packaging material supplier associations. Recycle BC received written submissions from 10 members of the steward community:

- Food and Consumer Products of Canada
- Retail Council of Canada
- Costco
- Scott's
- Clorox
- Premier Tech Home and Garden
- Canadian Plastics Industry Association
- Carton Council of Canada
- Paper and Paperboard Packaging Environment Council
- Canadian Federation of Independent Business

### 2.2 Local Governments

Many local governments play a key role as partners with Recycle BC as either communities that receive recycling service provided directly by Recycle BC, as contracted service providers to Recycle BC, or are communities that do not participate in the Recycle BC program because they are on the waitlist or they have chosen to opt out. Recycle BC received 13 written submissions from local governments:

- City of Vancouver
- Metro Vancouver
- City of Victoria
- Capital Regional District
- City of Chilliwack
- Regional District of Kitimat-Stikane
- Fraser Valley Regional District
- District of Kitimat
- District of Mission
- Qathet Regional District
- Cowichan Valley Regional District
- Cariboo Regional District
- Town of Whistler

### 2.3 Collectors (Depot Operators and Private Sector Service Providers)

Recycle BC contracts local governments, First Nations, private and not-for profit companies and waste management companies to deliver recycling services on its behalf to the residents of British Columbia.



Recycle BC and local governments contract depot operators to provide depot collection services for many smaller and rural communities. Recycle BC received four written submissions from the service provider community<sup>1</sup>:

- Mayne Island Recycling Society
- Saturna Community Club Recycling Centre
- Galiano Island Recycling Resources Society
- Waste Management Association of BC

## 2.4 First Nations Communities and their Representatives

Recycle BC contracts First Nations communities as service providers of recycling services to their residents and also provides curbside service or depot accessibility to several First Nations communities through Recycle BC's collection agreements with local governments, direct service contractors and depot operators. Some First Nations communities are waiting to join the Recycle BC program through Recycle BC's wait list. Recycle BC received two written submissions from organizations representing First Nations communities:

- Indigenous Services Canada
- Indigenous Zero Waste Technical Advisory Group

## 2.5 Environmental Non-Governmental Organizations (ENGOS)

While Recycle BC did not receive any written submissions from the ENGO community, the following issues were raised by environmental organizations during the July 19<sup>th</sup> consultation meeting:

- A request that Recycle BC report recovery rates for additional sub-categories of plastic packaging beyond rigid and flexible plastics.
- A better understanding of how Recycle BC identifies the First Nations communities that are eligible to receive service from Recycle BC.
- How and the extent to which Recycle BC is engaging consumers in order to improve the quality of material collected through streetscape recycling.

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<sup>1</sup> Please note that Mayne Island Recycling Society, Saturna Community Club Recycling Centre and Galiano Island Recycling Resources are all members of the Capital Regional District (CRD) and provide services under the CRD's contract with Recycle BC.

## Part 3: Stakeholder Feedback

### 3.1 Summary of Key Issues Raised During Phase Two Consultations

Recycle BC received submissions from a total of 29 stakeholders on the revised program plan presenting many different viewpoints. Key issues raised include:

#### 3.1.1 *Expanded Scope of Designated Materials*

The steward community does not support the expanded scope without amendments to the regulation to provide a clear regulatory backstop. Some members of the steward community argue that the definition of “packaging” as provided in the Environmental Management Act (EMA) does not legally designate either packaging-like product or single-use plastic items. Other members seem to accept the inclusion of packaging-like products in the revised plan but argue that the definition of “packaging” in the EMA does not obligate single-use plastic items. The steward community is also concerned that there has not been sufficient consultation on the broadened scope of designated materials, given the potential impact to stewards. They have requested that more extensive consultation be conducted with the steward community if the BC MoECCS intends to amend the Recycling Regulation to designate “packaging sold as product” and “single-use plastic items” and/or provide clarification and guidance on a broadened scope to the definition of PPP. They also request that amendments to the Regulation mirror similar changes to the scope of obligation made by other jurisdictions in Canada, e.g., EEQ’s recent designation of packaging-like products and paper products.

#### 3.1.2 *Steward Reporting of Newly Designated Materials*

With respect to reporting an expanded scope of materials, stewards indicate that they will be challenged to report on these materials in 2019 based on 2018 sales, as proposed by Recycle BC. Stewards believe that reporting on any newly designated materials should begin after the plan is approved and should allow for a year to gather the requisite data. Alternatively, they suggest that Recycle BC consider a phased-in approach to reporting on new materials.

#### 3.1.3 *Methodology to Prepare Revised Incentive Rates*

Local governments expressed dissatisfaction with the incentive rates provided for depot and curbside collection, stating that they are not sufficient to adequately cover their operating costs as required by the Recycling Regulation. They also contend that Recycle BC does not provide a transparent methodology for calculating the incentive rates as required by the Ministry in its recent guidance document, *Producers Paying the Cost of Managing Obligated Materials and Dispute Resolution* (April 24, 2018).

#### 3.1.4 *Program Expansion Criteria*

Local governments support the expansion of curbside, multi-family, depot collection and increased accessibility for First Nations communities but are concerned about the restrictions contained in the eligibility criteria for new curbside collection programs. As currently proposed they believe that the eligibility criteria prohibit too many communities from joining the program due to the requirement that communities be an “incorporated municipality”. Additionally, local governments want more flexibility in garbage service timing. Some local governments also expressed concern that the plan is unclear on how depot expansion will take place and how potential new depots are on-boarded. First Nations communities requested that Recycle BC accelerate its plans for expansion of services to their

communities and provided suggestions on how that could take place. In addition, ineligible small communities located close to large communities with recycling services would like to be provided with services despite the fact they do not meet the eligibility criteria.

### ***3.1.5 Material-Specific Recovery Rate Performance Reporting***

Widespread support was expressed for Recycle BC's proposal to report more detailed material-specific recovery rates including recovery rates for Paper, Plastics, Metal and Glass, as well as the plastics sub-categories of rigid plastics and flexible plastics. However, some stakeholders requested further disaggregation in material-specific performance reporting.

### ***3.1.6 Managing Program Costs***

While the steward community expressed support for the four delivery principles outlined in the plan, it was suggested that, in light of the more ambitious performance targets proposed in the plan, it include a fifth "economic sustainability" principle to encourage economic analysis when prioritizing projects and implementing the program plan. In addition, stewards requested more information about the extent of non-compliance in the Recycle BC program and the financial impact as a result of non-compliant businesses.

### ***3.1.7 Streetscape Recycling***

While Recycle BC committed in the plan to further study and research into ways to optimize streetscape recycling, local governments are looking for a clearer commitment that Recycle BC fulfil its responsibilities under the BC Recycling Regulation to provide streetscape recycling. In contrast, the steward community, given the results of the Recycle BC Streetscape Pilot Project, questions the practicality and feasibility of continued investment in streetscape collection and whether it can be an efficient or cost-effective way of collecting recyclables.

### ***3.1.8 Managing Environmental Impacts***

#### ***3.1.8.1 Energy from Waste***

Concern was expressed by local governments that Recycle BC identifies energy from waste as a feasible method for managing collected material particularly given the air quality impacts of that disposal method.

#### ***3.1.8.2 PPP in Organics Waste Stream***

There was agreement across stakeholder groups of the need to support Recycle BC's commitment to further research into the extent to which the quantity of PPP in organic waste collection programs is actually composted at end of life. They also support Recycle BC's intention to determine if the quantity of packaging and paper product recovered annually in organic waste collection programs can be included in the end-of-life disposition of this material in Recycle BC's Pollution Prevention Hierarchy report.

### ***3.1.9 Pollution Prevention Hierarchy***

Due to the increasing volume of difficult-to-manage materials entering the waste stream, local governments are looking for assurances that producers are designing their packaging and paper products in accordance with the pollution prevention hierarchy. Local governments and collectors have



an expectation that producers are placing a priority on opportunities for reduction and reuse in the PPP they supply to market.

## **3.2 Summary of Feedback by Stakeholder Group**

### **3.2.1 Steward Community**

Recycle BC received 10 submissions from the steward community all of whom reiterated their ongoing commitment to the responsible management of their packaging and paper through participation in the Recycle BC program. Their positions on a variety of issues is summarized below.

#### **3.2.1.1 Expanded Scope of Designated Materials**

The steward community does not support the expanded scope without amendments to the regulation to provide a regulatory backstop. Some members of the steward community argue that the definition of “packaging” as provided in the Environmental Management Act (EMA) does not legally designate either packaging-like product (e.g. aluminum pie plates, and plastic film sandwich bags sold as product) or single-use plastic items. Other members of the steward community argue that the definition of the packaging in the EMA does not obligate single-use plastic items. Alternatively, the Canadian Plastics Industry Association (CPIA) as well as local governments expressed support for the expansion of designated materials to include single-use plastics and packaging-like-products and support the alignment of the expanded scope to the G7 Plastics Charter and other international efforts to address plastic pollution.

The steward community is also concerned that there has not been sufficient consultation on the broadened scope of designated materials, given the potential impact to stewards. Their view is that if the BC MoECCS intends to amend the Recycling Regulation to designate packaging-like products and single-use plastic items or provide clarification guidance on a broadened scope then the MoECCS and by extension, Recycle BC, has a duty to consult prior to including the broadened scope in the program plan. As part of the consultation process, they would like a definitive list of newly designated materials to be developed along with a clear set of criteria used to establish the expanded list. They also request that amendments to the Regulation mirror similar changes to the scope of obligation made by other jurisdictions in Canada, e.g., EEQ’s recent designation of packaging-like products and paper products.

Additionally, they request that in developing a list of designated materials, Recycle BC determine how it will manage these newly designated materials through the recycling stream given that they are currently considered contaminants in the system. They also contend that much of this material is currently managed in the ICI and public space waste streams and since it is not prevalent in the residential recycling stream it should not be obligated.

#### **3.2.1.2 Reporting of Newly Designated Materials**

With respect to reporting any newly designated materials, stewards and their associations argue that reporting on any newly designated materials should begin after the plan is approved and should allow for a year to gather the requisite data, i.e. they would prefer to first report these material in 2020 using their 2019 sales and this data would be used to calculate the 2021 steward fees. Alternatively, they suggest that Recycle BC consider a phased-in approach to reporting on new materials.

#### *3.2.1.3 Data Transparency*

Stewards and their associations would like to see more transparency from Recycle BC in providing data related to the program. While they acknowledge that Recycle BC may not be able to provide some data due to its commercial interests, they request that Recycle BC consider providing at least one of the following alternatives:

- disaggregated material-specific recovery rates beyond the commitments in the plan to report recovery rates for Paper, Plastics, Metal and Glass, as well as the plastics sub-categories of rigid plastics and flexible plastics;
- fee revenues by material type; and
- the volume of obligated material supplied into the marketplace by material-type.

#### *3.2.1.4 Managing Costs*

While the steward community expressed support for the four delivery principles outlined in the plan, it was suggested that, in light of the more ambitious performance targets proposed in the plan, it include a fifth “economic sustainability” principle to encourage economic analysis when prioritizing projects and implementing the program plan. In addition, stewards requested more information about the extent of non-compliance in the Recycle BC program and the financial impact as a result of non-compliant businesses.

#### *3.2.1.5 Continuous Improvement*

Many stewards have made global commitments to make measurable improvements to the environmental footprint of their packaging and paper products and therefore support Recycle BC’s design principle of continuously improving the effectiveness and efficiency of the recovery of PPP in British Columbia.

#### *3.2.1.6 Research and Development*

Stewards are supportive of the work Recycle BC is doing to expand the range of materials that are collected for recycling. Extending the range of materials that can be managed through the recycling system requires collaborative partnerships and investments in innovation and R&D as demonstrated by Recycle BC’s pilot projects on recycling of other flexible plastics and plastic squeeze tubes.

#### *3.2.1.7 Promotion and Education*

The steward community supports ongoing investments in resident education and awareness programs and are willing to partner with Recycle BC to provide any relevant consumer insights that may help to improve resident engagement and recycling behaviours.

#### *3.2.1.8 Compostable Packaging*

Support was expressed for Recycle BC’s ongoing research into compostable packaging and paper products with a request that Recycle BC play a role in advancing a single, national harmonized standard or definition of compostability.

Stewards are committed to the ongoing success of the Recycle BC program and the effective and cost-efficient management of their materials but did express some reservations about specific aspects of the draft program plan. The following are their primary areas of concern:

#### *3.2.1.9 Streetscape Recycling*

Some stewards do not believe that streetscape recycling should be the responsibility of stewards because most material found in the streetscape stream comes from the ICI sector. It was also suggested that if this material is indeed going to be collected by Recycle BC as required by the Recycling Regulation, Recycle BC should consider directing this material to an energy from waste facility.

#### *3.2.1.10 Curbside Collection Containers*

Stewards with a specific business interest have asked that Recycle BC reconsider its planned phase-out of single-use bags for curbside collection.

### **3.2.2 Local Governments**

Recycle BC received written submissions from 13 local governments as part of the Phase Two consultation process. Feedback from this sector was diverse due to the different interests of various communities: some communities receive recycling services provided directly by Recycle BC, some communities are contracted service providers to Recycle BC, and some communities are not yet participants in the Recycle BC program. Their positions on a variety of issues is summarized below.

#### *3.2.2.1 Methodology to Prepare Incentive Rates*

Local governments expressed a dissatisfaction with the incentive rates provided for depot and curbside collection indicating that they are not sufficient to adequately cover their operating costs. They also contend that Recycle BC does not provide a transparent methodology for calculating the incentive rates as required by the Ministry in its recent guidance document, Producers Paying the Cost of Managing Obligated Materials and Dispute Resolution (April 24, 2018).

#### *3.2.2.2 Program Expansion Criteria*

Local governments support the expansion of curbside, multi-family, depot collection and increased accessibility for First Nations communities, but they are concerned about the restrictions contained in the eligibility criteria for new curbside collection programs. As currently proposed they believe that the eligibility criteria results in the exclusion of too many communities from the program. Some suggested that expansion of the Recycle BC program could be more quickly achieved if electoral areas adjacent to existing Recycle BC curbside collection routes be eligible to join the program. In addition, the plan is unclear on how depot expansion will take place and suggest that in order to ensure widespread and fair access to recycling, Recycle BC adopt 'depots per capita' as an accessibility indicator.

#### *3.2.2.3 Expanded Scope of Designated Materials*

Local governments do not share stewards' concern about the expanded scope. In fact, they expressed support for Recycle BC's proposal to expand the scope of designated materials to include packaging-like products and single-use plastic items and the alignment of this proposal with the G7 Plastics Charter and other global initiatives.

#### *3.2.2.4 Performance Targets*

They support the more aggressive performance targets outlined in the plan including the 78% program recovery rate and the material-specific recovery rates.

#### *3.2.2.4 Performance Reporting*

They support Recycle BC's proposal to report material-specific recovery rates for paper, plastics, metal and glass -- giving communities more insight into how materials are performing through the system.

#### *3.2.2.6 Promotion and Education*

Local governments agree with Recycle BC that effective resident engagement is essential to the success of the program. There was universal support for Recycle BC's approach to resident P&E efforts designed to further engage BC residents in proper recycling behaviours and a willingness to work with Recycle BC on enhanced P&E efforts.

While local governments do support elements of the plan as noted above, they also contend there are opportunities for improvement. They continue to be concerned with the following aspects of the plan:

#### *3.2.2.7 Streetscape Recycling*

While communities appreciate Recycle BC's intentions to continue studying ways to improve streetscape recycling, they are looking for a commitment from Recycle BC that it will provide public space recycling.

#### *3.2.2.8 Managing Environmental Impacts*

Due to the increasing volume of difficult-to-recycle materials entering the waste stream, communities are looking for assurances that producers are designing their packaging and paper products in accordance with the pollution prevention hierarchy. They contend that if producers place a priority on opportunities for reduction and reuse, it is hoped that the program can achieve an absolute reduction in the amount of material requiring management.

There is concern that Recycle BC identifies energy from waste as a feasible method for managing collected material particularly given the air quality impacts of that disposal method.

### **3.2.3 Collectors (Depot Operators and Private Sector Service Providers)**

Recycle BC received four submissions from collectors. The submissions received reflect the views of these depot operators and a waste management association. Their positions on a variety of issues is summarized below.

#### *3.2.3.1 Expanded Scope of Designated Materials*

Collectors support Recycle BC's proposal to expand the scope of designated materials to include single use plastics and packaging like products.

#### *3.2.3.2 Program Expansion*

There is general support for the proposal in the program plan for increased flexibility around satellite depots. Collectors believe the establishment of satellite depots will allow more underserved communities to participate in the program and divert their recyclables from landfill.

Collectors would like to see more flexibility in the eligibility criteria for joining the Recycle BC program particularly for smaller and more remote communities. Collectors believe that the program can collect more materials if Recycle BC were to permit bulk drop-offs from remote areas at Recycle BC depots. Collectors oppose the ban on this method for the collection of materials from underserved areas.

### *3.2.3.3 Incentive Rates*

There were strong opinions expressed on the incentive rates provided for the operation of depots stating that they are inadequate and do not sufficiently cover the costs required to provide this service. As a result, depot operators are overly reliant on volunteers and other sources of funding to continue to provide services.

### *3.2.3.4 Stakeholder Collaboration*

While supportive of Recycle B.C.'s four principles, the waste management industry recommends the Recycle B.C. Program include a collaborative effort from all stakeholders along the material chain of custody and that Recycle B.C.'s Industry Advisory Council include representatives that are directly involved in the private waste services industry specifically in the collection and processing side of the business.

## **3.2.4 First Nations Communities**

Recycle BC received two submissions from organizations representing First Nations communities. The submissions put forward the following recommendations on the updated program plan:

### *3.2.4.1 Program Expansion*

- A request that Recycle BC accelerate its plans for expanding its program to First Nations communities. This could be achieved by revising the target number of First Nations communities that are eligible to join the Recycle BC program, allowing existing Recycle BC collectors to expand service to First Nations communities within their vicinity and/or allowing First Nations residents to access Recycle BC depots in their regions.
- Another suggestion was for Recycle BC to consider a step-wise approach to bringing First Nations communities into the program, many of whom are reluctant to sign a membership agreement that contains heavy penalties for exceeding contamination thresholds. First Nations communities would be willing to work with Recycle BC to receive training and audits in order to achieve the quality control requirements prior to registering as full participants.
- It was suggested that Recycle BC track and report the progress being made in closing the gap between the number of First Nations communities receiving Recycle BC services in relation to the rest of the province.

## **3.2.5 Environmental Non-Governmental Organizations (ENGOS)**

While Recycle BC did not receive any written submissions from the ENGO community, the following issues were raised by environmental organizations during the July 19<sup>th</sup> consultation meeting:

- A request that Recycle BC report recovery rates for additional sub-categories of plastic packaging beyond rigid and flexible plastics.
- A better understanding of how Recycle BC identifies the First Nations communities that are eligible to receive service from Recycle BC.
- How and the extent to which Recycle BC is engaging consumers in order to improve the quality of material collected through streetscape recycling.

## Part 4: How Feedback was Considered by Recycle BC

### 4.1 Responses to Key Issues

Recycle BC gave careful consideration to the feedback received from stakeholders on the updated program plan and conducted a thorough review of the plan to determine how best to incorporate the feedback received. In this section, we address the key issues as listed in Section 3.1 of this report and how they were considered by Recycle BC.

#### 4.1.1 Expanded Scope of Designated Materials

In light of the steward community's concerns about the broadened scope of designated materials, Section 3.1 of the program plan has been revised to reflect its original scope of packaging and paper product. References to packaging-like products and single-use plastics have been removed.

When it submits its program plan to the government for approval, Recycle BC will request that the BC government conduct a consultation on potential amendments to the regulation to expand the scope of designated materials and that it provide clarifying guidance documents to avoid confusion about products that will be included and excluded from the program. We will also request that in the interests of regulatory harmonization, the government, in drawing up its lists of designated and exempted products, consider EEQ's recently broadened scope of designated materials.

Once a regulatory backstop for a broadened scope is in place, Recycle BC will amend its Program to reflect the amendments.

#### 4.1.2 Steward Reporting of Newly Designated Materials

Following the completion of potential regulatory amendments to the scope of designated materials, Recycle BC will amend its plan and in conversation with the steward community, determine steward reporting requirements, including timing for data gathering and submission.

#### 4.1.3 Methodology to Prepare Revised Incentive Rates

In response to local governments' concerns that Recycle BC does not provide a transparent methodology for calculating incentive rates, the program plan has been revised as follows:

- *Section 4.3.2 Methodology to Prepare Revised Financial Incentives* has been amended to require that the next cost study be overseen by the Recycle BC Advisory Committee. Membership of the Advisory Committee includes local governments such as Metro Vancouver, Regional District of East Kootenay and the Town of Comox.
- *Section 4.3.2* has been amended to contain a commitment that Recycle BC will conduct its next cost study in 2020, rather than 2021, as originally planned.
- *Appendix B Summary of Performance Measures* has also been amended to reflect both these commitments.

It is hoped that the Advisory Committee's oversight of the Cost Study will address concerns about transparency of the methodology and will provide confidence that the resulting incentive rates are based on a fair and reasonable costing process that includes efficiency benchmarks.

In addition, Recycle BC will continue to publish a summary report of each cost study as they are completed. The most recent study, completed in 2018, is available on Recycle BC's website [here](#).

#### **4.1.4 Program Expansion Criteria**

To address local governments' concerns regarding eligibility criteria for receiving recycling services, the program plan has been amended as follows:

- *Section 4.3.5 New Curbside Programs* has been amended to enable communities to qualify for recycling services if they have had a curbside garbage collection program in place for a minimum of two years prior to the proposed introduction of curbside recycling, instead of by 2014, as originally required.
- *Section 4.3.5* has also been amended to contain a commitment to develop an equivalency definition for communities with 5,000 residents that does not require incorporation as a criteria for eligibility.

To address concerns expressed by ineligible small communities located close to large communities with PPP recycling services that they should be provided with services:

- *Section 4.3.8 Depot Collection* has been amended to contain a commitment by Recycle BC that upon completion of its current expansion phase, we will conduct a province-wide depot accessibility assessment to determine the adequacy of depot coverage, with the objective of continuing to improve our current accessibility metric that 98% of B.C. households have access to depots.
- *Appendix B Summary of Performance Measures* has also been amended to reflect the addition of this commitment.

In addition to these amendments, to address First Nations request that expansion of services to their communities be advanced, Recycle BC has developed a working group with Indigenous Services Canada to collaborate on the provision of services to First Nations communities as outlined in Section 4.3.9 of the program plan.

#### **4.1.5 Material-Specific Recovery Rate Performance Reporting**

Recycle BC is pleased that there was widespread support for our proposal to report on material-specific recovery rate performance for paper, plastics, metal and glass, as well as the plastics sub-categories of rigid plastics and flexible plastics. Based on the results of this first level of reporting, Recycle BC will determine if it is appropriate to provide further sub-category recovery rate information as the program matures over its next five years. Recycle BC will also explore opportunities to publish performance information used to set steward fees to the extent that this information does not compromise Recycle BC's commercial interests.

#### **4.1.6 Managing Program Costs**

Recycle BC is pleased that the steward community expressed support for the four delivery principles outlined in the plan. We also appreciated the suggestion that, in light of the more ambitious performance targets, the plan be revised to include a fifth "economic sustainability" principle to encourage economic analysis when prioritizing projects and implementing the plan. However, a review of the EMA and related policy documents indicated there is nothing in the regulations that would permit producers' economic interests to override or mitigate their extended producer responsibility obligations under the law. This does not preclude Recycle BC from realizing the economic benefits of operating an efficient program, as supported by the first principle: "Focus on outcomes, not process – maximize recovery, maximize efficiency, enhance resident service levels while minimizing complexity."



#### ***4.1.7 Streetscape Recycling***

While the steward community questions the practicality and feasibility of continued investment in streetscape collection, given high levels of contamination, local governments are looking for a commitment from Recycle BC that it will provide streetscape recycling services.

The Recycling Regulation requires that Recycle BC provide streetscape services for packaging and paper products and that Recycle BC members fund this work. Despite the fact that our pilot projects indicated a very high level of contamination in streetscape material, we are committed to continuing to work in partnership with local governments to conduct more streetscape collection studies to determine how to best reduce the contamination levels such that streetscape material can meet marketability criteria.

#### ***4.1.8 Managing Environmental Impacts***

##### ***4.1.8.1 Energy from Waste and the Pollution Prevention Hierarchy***

Recycle BC appreciates the concern expressed by local governments regarding the potential air quality impacts of recognizing energy-from-waste as a material management option. However, as a method of addressing packaging formats that cannot currently be recycled, it is preferable to disposal in landfill until recycling solutions are identified. That said, we applaud the many Recycle BC members that have made global commitments to make 100% of their packaging recyclable by 2025 because designing packaging for recyclability will be a critical contributor to improving the economics of recycling without having to resort energy from waste as the final disposition for PPP.





## Part 5: Conclusion and Next Steps

Recycle BC greatly appreciates the substantive investments in time, involvement, and thoughtful feedback provided by our many stakeholders over the last ten months.

As discussed in this report, revisions were made to the plan to reflect this feedback. This consultation report and the Recycle BC program plan will be submitted to the BC Minister of Environment and Climate Change Strategy for approval.

## Appendix A: Stakeholder Communication and Distribution

Below is a list of all communications sent to stakeholders during the **Phase Two** consultation:

Date Sent	Topic	Stakeholder Group	Open Rate	Click Rate
June 27 2018	<a href="#">Invitation sent to collectors for July 18 consultation meeting</a>	Collectors/Local Governments/First Nations Communities	48%	26%
June 27 2018	<a href="#">Invitation sent to stewards for July 17<sup>th</sup> consultation meeting</a>	Stewards	31%	16%
June 27 2018	<a href="#">Invitation sent to ENGOs for July 19<sup>th</sup> consultation meeting</a>	ENGOs	56%	36%
July 12 2018	<a href="#">Reminder e-mail regarding the July 18<sup>th</sup> consultation meeting</a>	Collectors/Local Governments/First Nations Communities	50%	33%
July 12 2018	<a href="#">Reminder e-mail to Stewards regarding the July 17<sup>th</sup> consultation meeting</a>	Stewards	30%	17%
July 12 2018	<a href="#">Reminder e-mail to ENGOs regarding the July 19<sup>th</sup> meeting</a>	ENGOs	60%	20%
July 17 2018	<a href="#">Meeting materials sent to stewards</a>	Stewards	32%	14%
July 18 2018	<a href="#">Meeting materials sent to collectors, local governments and First Nations communities</a>	Collectors/Local Governments/First Nations Communities	47%	24%
July 19 2018	<a href="#">Meeting materials sent to ENGOs</a>	ENGOs	45%	8%
July 31 2018	<a href="#">Notice that consultation meeting QAs now available</a>	All stakeholders	33%	18%

A list of affiliations invited to participate in Recycle BC's program plan consultation can be [found here](#).

Below are lists of attendees for each Phase Two consultation meeting:

### Steward Meeting – July 17, 2018:

A.Lassonde	Canadian Beverage Association
Aritzia	Canadian Franchise Association
Bayer Inc.	Canadian Plastics Industry Association
BC Ferries	Canadian Tire Corp
Bell	Capital One
Bell Mobility	Carton Council Canada
BMW Canada Inc.	Chaser's Fresh Juice Vancouver
Bonduelle	City of Vancouver

CKF Inc.
Comox Valley Regional District
Corinthian Distributors
Costco
CPIA
CropLife Canada
Dare Foods Limited
Dart Canada Inc.
Eatmore Sprouts & Greens Ltd.
EEQ
Envirotech Associates Limited
EPI
FCA Canada
Food & Consumer Products of Canada
Fortis BC
Golden Boy Foods
Great Canadian Plastics Association
Guy Perry & Associates
Home Hardware
ICBC
LEGO
Lindt & Sprungli Canada
Loblaw Company Ltd.
Loyalty One
Multi-Material Stewardship Manitoba Inc.
North Coast Regional District
Pacific Blue Cross
Pfizer Inc.
PPEC
PPG
Quality Foods Ltd
Retail Council of Canada
Salt Spring Coffee
Saputo
Scotts Canada Ltd.
Scout Environmental
Smucker Foods of Canada
Staples Canada
Taro Pharmaceuticals
Telus

The Oppenheimer Group
Tree of Life
V.I.P. Soap Products Ltd
Village of Cumberland
Whirlpool
Whistler Blackcomb
Yamaha Motor Canada Ltd.

**Local Government/Collector/First Nations/Waste Management Meeting – July 18, 2018:**

Abbotsford Mission Recycling Program	London Drugs
BC Bottle and Recycling Depot Association	Manor Hall Group
Bottle Depot	Metro Vancouver
Cariboo Regional District	PIRS
City of Abbotsford	Pitt Meadows Bottle & Return Depot
City of Burnaby	Regional District of Central Kootenay
City of Chilliwack	Regional District of Central Okanagan
City of Kamloops	Regional District of Fraser-Fort George
City of Nelson	Regional District of Kitimat-Stikine
City of North Vancouver	Regional District of Okanagan-Similkameen
City of Penticton	Ridge Meadows Recycling Society
City of Richmond	Salt Spring Island Recycling
City of Vancouver	Squamish-Lillooet Regional District
Columbia Bottle Ent.	Sunshine Coast Regional District
Columbia Shuswap Regional District	Super Save
District of Mission	Town of Golden
District of Summerland	Township of Langley
Emterra Environmental	UBCM
Green by Nature	Village of Cumberland
Indigenous Services Canada	VitalAire
Jeff Ainge & Associates	Waste Control Services
Let's Talk Trash	

**ENGO Meeting – July 19, 2018:**

Canopy
Georgia Strait Alliance and Global Ghost Gear Initiative
West Coast Environmental Law



## Appendix B: Presentation Materials and Q&A Documents

All Phase One and Phase Two presentations, meeting recordings and questions & answers documents for the individual stakeholder meetings are posted on Recycle BC's website and can be found [here](#).



Reference: 345241

June 28, 2019

Tamara Burns  
SVP Western Operations  
Canadian Stewardship Services Alliance  
(on behalf of Recycle BC)  
171 Esplanade West, Suite 230  
North Vancouver, BC V7M 3J9

Dear Tamara Burns:

Thank you for submitting proposed amendments to the Packaging and Paper Product Extended Producer Responsibility Plan (the plan) in fulfillment of the requirements of section 6 of the [Recycling Regulation](#) (the Regulation) made under the *Environmental Management Act*. I appreciate the industry's continued commitment to achieving compliance in this regard.

Under the Regulation, the director has the ability to both amend an approved extended producer responsibility (EPR) plan on his own initiative, and to approve amendments to an approved plan that have been proposed by a producer. I have completed my review of, and approve, the amendments proposed by Recycle BC in the plan submitted on June 21, 2019.

Recycle BC was provided with my preliminary decision letter dated May 22, 2019 and had the opportunity to propose further amendments or provide additional information for consideration. Recycle BC addressed several of the identified deficiencies either in the revised plan itself or through information provided; however, certain components remain outstanding. Therefore, in addition to the amendments proposed by Recycle BC, and approved by me in this letter, I am further amending the plan, pursuant to section 5(5) of the Regulation concerning the following areas:

1. Producers paying the costs

The plan does not indicate how or when the results of the process will be reflected in a future plan amendment once the cost study and consultation process is complete. Pursuant to section 5 of the Regulation, "the plan [itself] must adequately provide for the producer paying the costs..." A more detailed commitment in this regard is required. I am therefore requiring the following amendment to address this deficiency:



- By August 31, 2020, Recycle BC will propose amendments to the plan that demonstrate how the plan itself meets subsection 5(1)(c)(i) of the Regulation. These amendments will summarize and justify the cost study and methodologies consulted upon, the process involved, how stakeholder comments were solicited and addressed, the resulting basis of compensation being proposed and how any adjustments to compensation/producers paying costs will be applied.

## 2. Reasonable and free consumer access to collection

Pursuant to subsection 5(1)(c)(iii) of the Regulation, the plan must adequately provide for reasonable and free consumer access to collection facilities or collection services.

### a) Curbside equivalency definition and adjacency criteria

The amended plan commits to, in 2019, determining an equivalency definition regarding curbside collection eligibility criteria for local governments. As indicated in my May 22, 2019 letter, the plan does not indicate how or when the plan will be revised in a future plan amendment to reflect this definition. The amended plan also commits to, in 2021, assessing the feasibility of servicing smaller, densely populated communities located adjacent to communities with curbside service; however, the plan does not indicate how or when the plan will be revised in a future plan amendment to reflect such adjacency. I am therefore requiring the following amendments to address these deficiencies:

- By August 31, 2020, Recycle BC will propose amendments to the plan that demonstrate how the plan itself meets subsection 5(1)(c)(iii) of the Regulation. These amendments will justify the methodology, the process involved, how stakeholder comments were solicited and addressed, and include equivalency definition parameters, including timelines for offers to communities meeting the equivalency definition.
- By August 31, 2021, Recycle BC will propose further amendments to the plan that demonstrate how the plan itself meets subsection 5(1)(c)(iii) of the Regulation. These amendments will justify the methodology, the process involved, how stakeholder comments were solicited and addressed, and include adjacency criteria, including timelines for offers to communities meeting that criteria.

### b) Streetscape

The plan does not indicate how or when the results of the advisory group consultation process will be reflected in a future plan amendment including specific service commitments once the consultation is completed. Pursuant to section 5 of the Regulation, the plan must adequately provide for the collection of the product "...from municipal property that is not industrial, commercial or institutional property."

A more detailed commitment in this regard is required. I am therefore requiring the following amendment to address this deficiency:

- By August 31, 2020, Recycle BC will propose amendments to the plan that demonstrate how the plan itself meets subsection 5(1)(d)(ii) of the Regulation. These amendments will summarize the advisory group consultation methodologies, the process involved, how stakeholder comments were solicited and addressed, and the resulting service and funding commitments, and program deliverables.

c) Multi-family awareness and service

While the plan does address a comprehensive means to increase consumer awareness in this sector, and demonstrates a 4% increase from 2017-2018 in multi-family households served, as indicated in my May 22, 2019 letter, the plan does not include a graduated multi-family servicing target for multi-family expansion. A more detailed commitment in this regard is required. I am therefore requiring the following amendment to address this deficiency:

- By August 31, 2020, Recycle BC will propose amendments to the plan that include a service target for multi-family expansion.

The above additional amendments form part of Recycle BC's plan and take effect on June 28, 2019.

These additional amendments are required to ensure the plan adequately provides for the elements set out in Subsections 5(1)(c)(i), (iii), and 5(1)(d)(ii) of the Regulation. Specifically, I must be satisfied that:

- the producer will propose amendments to the plan that demonstrate how the plan itself meets subsection 5(1)(c)(i) of the Regulation following completion of the cost study;
- the producer will propose amendments to the plan that demonstrate how the plan itself meets subsection 5(1)(c)(iii) of the Regulation, including equivalency definition and adjacency criteria;
- the producer will propose amendments to the plan that demonstrate how the plan itself meets subsection 5(1)(d)(ii) of the Regulation, including streetscape service and funding commitments, and program deliverables; and
- the producer will propose amendments to the plan that demonstrate how the plan itself meets subsection 5(1)(c)(iii) of the Regulation, including a service target for multi-family expansion.

Pursuant to section 6 of the Regulation and based on the plan's original approval date of April 15, 2013, Recycle BC's next plan review must be completed by April 15, 2023. However, a director under the *Environmental Management Act* may amend the approved plan pursuant to section 5(5) of the Regulation or rescind approval of the approved plan pursuant to section 6.1 of the Regulation, should Recycle BC fail to meet the commitments set out in the approved plan. Please also note that failure to comply with an approved plan may result in the imposition of an administrative monetary penalty of up to \$40,000 or a fine of up to \$200,000.



### **Future plans and amendments**

As has been conveyed to other stewardship agencies, 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.

I acknowledge that some plans better address these various concerns than others, and that collaboration between some producers/appointed agencies and the ministry is also underway. Additionally, the ministry intends to develop further guidance on select areas of concern.

Related to the above concerns, but beyond my approval in this letter, I note the following opportunities for continuous improvement specific to Recycle BC:

1. Given the recently stated recovery rate of 78.1 % in Recycle BC's 2018 Annual Report, and the currently projected recovery rates of 75% in 2019, 77% in 2020 and 2021, and 78% through 2022, there may well be an opportunity to set more realistic recovery rates within the term of this plan as it continues to evolve; and
2. With all levels of government focusing on reducing plastics and single-use items, as well as the various tools such as Extended Producer Responsibility, bans, levies, recycled content and/or procurement standards, etc. being considered, it will be in Recycle BC's interests to continue to proactively advance practical means to support this direction.

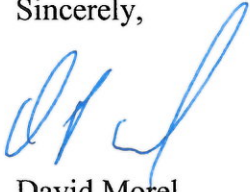
### **Third Party Assurance for Non-Financial Information in Annual Reports**

Third party assurance for non-financial information in Annual Reports is required through Section 8(2)(h) of the Regulation. The assurance report should be completed in accordance with the document entitled, "Third Party Assurance Requirements for Non-Financial Information in Annual Reports" dated October 2018 and revised from time to time, which is enclosed.

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

If you have any questions regarding the implementation of your plan, or suggested opportunities for improvement, please contact your ministry file lead.

Sincerely,



David Morel  
Assistant Deputy Minister  
Environmental Protection Division

cc: Kris Ord, Executive Director, Environmental Standards Branch  
Bob McDonald, Director, Extended Producer Responsibility Section  
Hanna Vovk, Ministry file lead, Extended Producer Responsibility Section