

Consultation Summary for Recycle BC's Packaging and Paper Product Extended Producer Responsibility Plan

June, 2019

Recycle BC's stewardship plan can be found at https://recyclebc.ca/stewards/regulation_and_stewardship_plan/



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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.

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

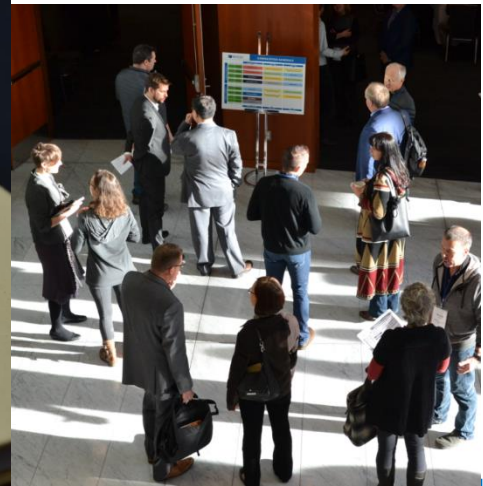
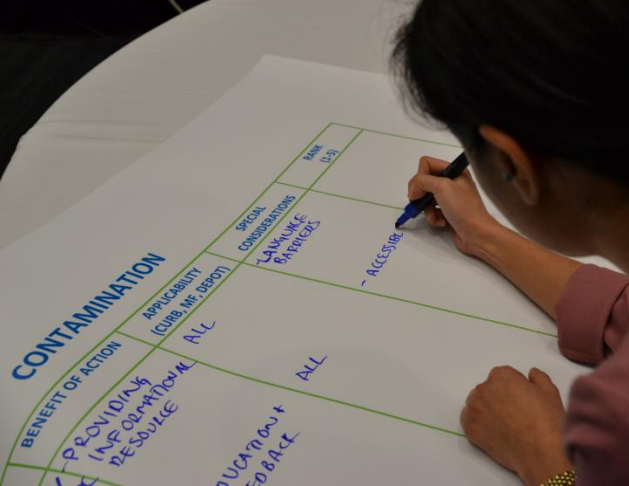
Recycle BC has been in dialogue with Ministry of Environment and Climate Change Strategy on suggested feedback to the Program Plan.

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



RECYCLEBC™

November 2017 Consultation



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:

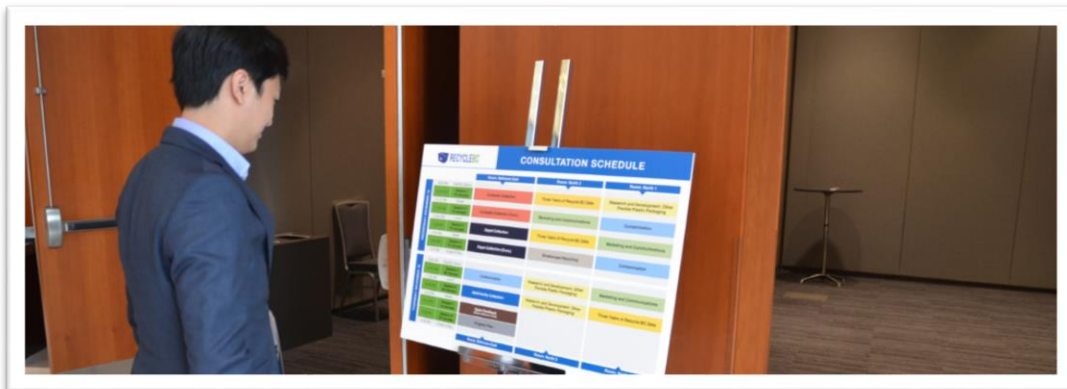
- Pre-consultation survey
- Activities during the event including: group workshops, comment boards, webinar questions, Q&A sessions
- Post consultation feedback period (Written Feedback Period)

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.

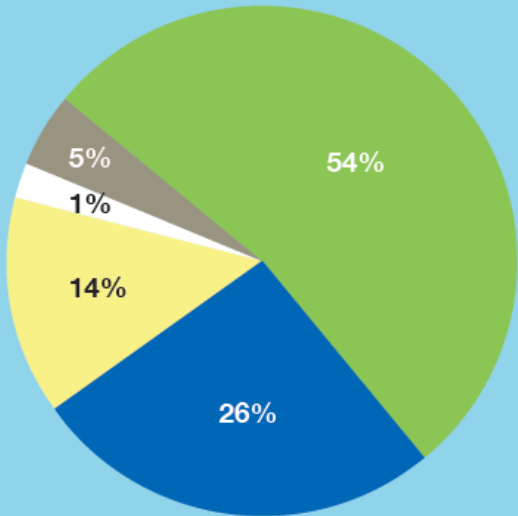


Recycle BC Consultation Participation

ABOUT

| | | |
|--|---|--|
| <p>2 days</p>  | <p>9 workshop topics</p>  | <p>18 workshop sessions</p>  |
|--|---|--|

PARTICIPATION

| | |
|---|--|
| <p>137 organizations</p> <hr/> <p>24 of 29 Regional Districts represented (by local governments and contracted collectors)</p> <hr/> <p>253 attendees 222 in person / 31 via webcast</p> | <p>Sectors represented (by individuals attending in-person):</p> <ul style="list-style-type: none"> ● 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

| | | |
|--|---|--|
| <p>900+ questions and comments recorded at the consultation</p> | <p>46 online feedback form submissions</p>  | <p>10 formal letter submissions</p>  |
|--|---|--|



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

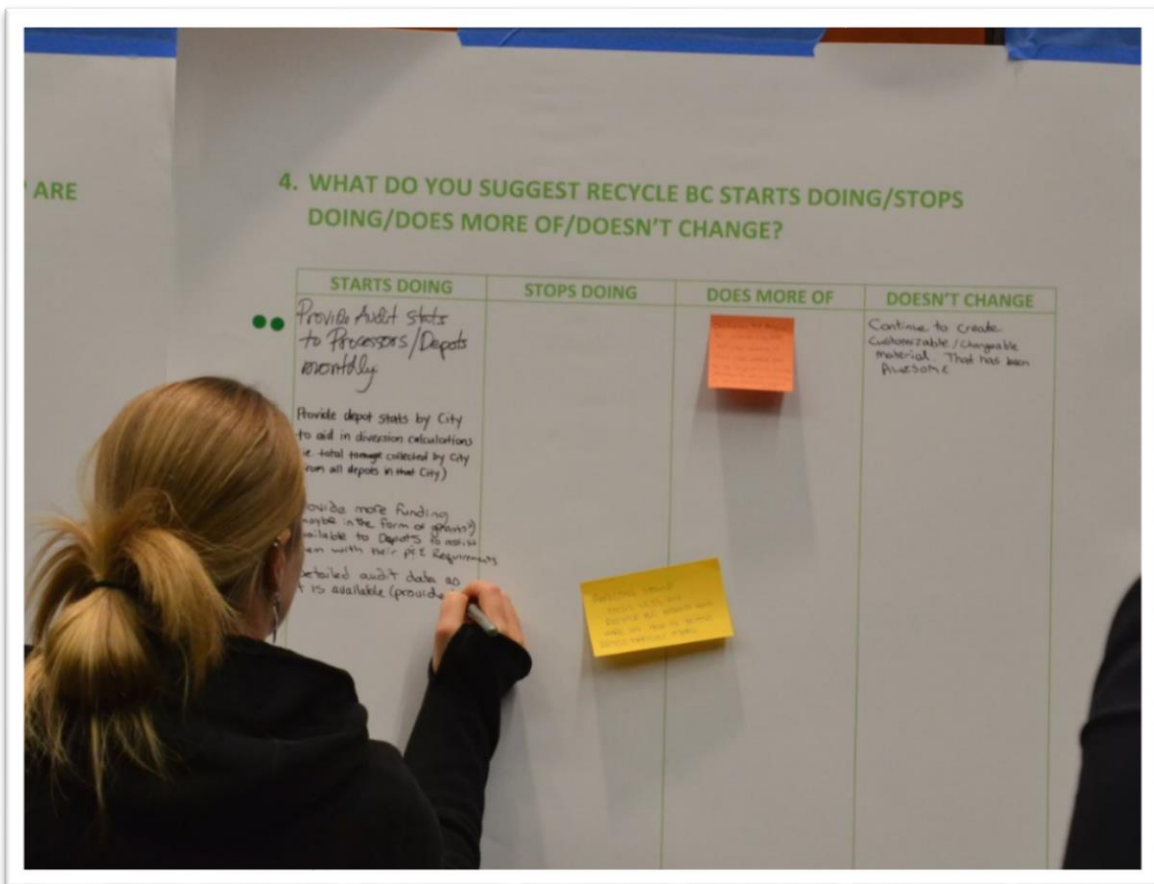
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considering recycling. Why not incentivize both reduction and recycling based on the region's yearly study?

- 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.^
- 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.

^ 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.^
- 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.*^
- Strong objections to the proposed elimination of incentive rates for paper, cardboard and containers at government and Group 3 depots.^*
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.^*
- Elimination of fees for depot collection of fibre and plastic containers will not be well received by residents and will likely force closures.*^
- Calls to cancel Group 3 depots completely.*^
- 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.^
- 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.

^ 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.[^]
- 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

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[^] 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.*^



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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.[^]
- 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.[^]

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.*[^]
- 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.[^]
- Compare communities with similar dynamics across all data sets to help develop best practices, share knowledge, benchmarking.[^]
- 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.[^]

*Several votes of agreement at consultation session.

[^] 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

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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.

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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.

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- 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 results 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.

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- 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:



Appendix A: Online Feedback Submissions

| Stakeholder Group | Topic | Question/Comment | Response (if direct question posed, otherwise noted as feedback) |
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| Regional District | Program Plan | <p>We understand that Recycle BC can only present 5-year plans but we assume Recycle BC will have a vision for 25 years. 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 (contracted service) for any regional district in BC, therefore, when a regional district is planning their infrastructure, diversion goals or even stating strategies to reach their goals, how are those valid if there is no guarantee that Recycle BC will change its direction every 5 years? In particular, what is the Recycle BC vision going forward for expanding recyclables from PPP to other items such as glass (we assume some jurisdictions have started this already).</p> <p>Proposed changes discussed incentives for more tonnage received; we assume, apart from business requirements, this also helps in increased diversion. However, in the Regional District's Solid Waste Management Plan we are asked by the Province to look into reducing before considering recycling. Most regional districts now have their waste composition studies completed. Why not incentivize both reduction and recycling based on the region's yearly study?</p> | |
| Regional District | Program Plan | <p>The Regional District of Kitimat-Stikine submits the following in response to the presentation by Recycle BC of their proposed 5-year plan and the consultation forum which took place at the Anvil Centre in New Westminster, BC on November 15 & 16, 2017.</p> <p>Firstly, the Regional District wishes to thank Recycle BC for the opportunity to participate in the consultation process and the roundtable forums and discussion which took place at the event. The Regional District is hopeful that the feedback generated at the event is sincerely taken into consideration by Recycle BC and that</p> | |

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| | <p>any changes implemented by Recycle BC take into account the many challenges facing communities in rural and un-incorporated areas of British Columbia.</p> <p>With regards to the projected 5-year plan introduced by Recycle BC at the consultation event, the Regional District has concerns regarding several points identified in the plan. Under the proposed plan, expansion of the current Recycle BC curbside program is limited to incorporated municipalities over 5000 population, where curbside garbage collection was in place by May 2014. These standards for program expansion severely restrict rural areas and completely exclude unincorporated communities. It is the position of the Regional District of Kitimat- Stikine that these standards are unnecessarily restrictive and do not fairly allow for access to the program for all British Columbians.</p> <p>During the presentation for the Program Plan, it was identified that the goal of the Program was to review eligibility requirements for communities wishing to be included in the curbside program and that Recycle BC would continue to add waitlisted collectors, including those who originally declined inclusion in the program. The Regional District of Kitimat-Stikine was originally denied inclusion in the program because it did not have curbside collection in place during the initial program roll-out. The Regional District has repeatedly expressed a desire for inclusion in the program and in turn have been told that we are on the waitlist. The Regional District would like to know the status of the waitlist and what is the criteria Recycle BC uses to select communities from the waitlist for inclusion in the program. The Regional District disagrees with the current practice of expanding the program to communities which previously declined inclusion over those which did not initially meet program requirements but have since introduced curbside collection to their communities independent of Recycle BC.</p> <p>The Regional District is concerned that the standards Recycle BC uses to measure program success do not fairly represent the challenges faced by those living in rural BC communities. As an example, Recycle BC asserts that 98% of the Province has access to a depot. The measure used is related to driving distance, 30 minutes urban and 45 minutes rural. The Regional District feels that this is not an accurate measure as geographic distance alone should not define reasonable access. Demographics of the</p> | |
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| | <p>community must be taken into account. Several communities in the Regional District are not served by public transit, many residents do not own vehicles or have driver's licenses, and the referenced 45 minute driving time likely does not take into account adverse weather conditions or other issues affecting rural travel. The Regional District believes that rather than Provincial measurement standards, access to the program and depots should be assessed at a regional level.</p> <p>It was mentioned during the Program Plan Workshop that the Program was to focus on the outcome, not the process and that the stage would be set for evolution. The Regional District of Kitimat-Stikine did not meet program entrance requirements in 2014. Under the proposed program expansion, the majority of the Regional District still does not meet those requirements; the only exceptions are the City of Terrace, which is already a Recycle BC community and the District of Kitimat. For its part, the Regional District has, in the past 3 years introduced 3 stream curbside collection (Garbage, Recycling and Organics) to the Greater Terrace area, serving 2884 households. If the Regional District still does not meet the requirements for inclusion in the Program, then the Program needs to evolve further.</p> <p>While the Regional District ultimately wants to be fully included in the Recycle BC curbside program, alternate forms of assistance from Recycle BC to serve more remote and rural communities would be welcome. In the past, the Regional District has proposed operating satellite collection depots at rural, manned landfill sites. The Regional District would like to transport the collected materials and drop off at the Recycle BC depot, (which is located in the unincorporated community of Thornhill) for processing through Recycle BC. The same depot currently serves as the Recycle BC Depot for the City of Terrace. This proposal represents an evolution of the Recycle BC program; bulk drop off of Printed Paper and Packaging (PPP). One party dropping off recyclable materials from 200 households must be recognized as a practical alternative to the same 200 households travelling 45 minutes or more by car to drop off the material individually for inclusion in the same Recycle BC material stream.</p> <p>It must be acknowledged that the Regional District vehemently argued for inclusion in the initial uptake of the Program. We have since rolled out a full service curbside collection program and have introduced rural recycling and diversion initiatives. The</p> | |
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| | | <p>Regional District wishes for a collaborative and cooperative relationship with Recycle BC for the benefit of all of our residents.</p> <p>While Recycle BC takes the position of delivering the Program to those communities which make the most economic sense from a business delivery perspective, the Regional District counters that Recycle BC is ultimately funded by all British Columbians and as such all British Columbians deserve access to the program.</p> | |
| Recycling society (depot) | Program Plan | <p>I have a question about your business plan for small rural isolated depots. Since the onset of the original MMBC plan, we at the Southern Gulf Islands Recycling Coalition have made it very clear that the payments from RBC do not come close to covering our costs to collect PPP. Since you have been aware of this and have not changed your payment approach to our depots, I am wondering what your business plan is for our survival, or if your business plan is for us to close our doors. This would be helpful for us to know for our ongoing planning.</p> | <p>Recycle BC's ultimate aim is to contract with depot partners in communities that support Recycle BC's goals and commitments pertaining to depot accessibility. It is our intent to continue to support the collection of PPP on Mayne Island through a depot contract with the Capital Regional District.</p> |
| Local Government | Curbside Collection | <p>The Village of Salmo has raised our concerns with the proposed 5,000 threshold under which communities will not be provided curbside recycling services and we would like to ensure this concern is noted in your consultation paper.</p> <p>Even though Salmo is a small rural community of 1,100, we are primarily residential and have curbside garbage pickup. Small rural communities are also often faced by higher energy consumption costs as a result of many people commuting to work in surrounding larger centers. We also have very limited tax bases (low property costs, low income, mostly residential) and have the most limited capacity of all municipalities to provide these services on our own (if Recycle BC does not provide financial incentive). That being said, we are generally civic minded and care about the environment, this was proven in our exhaustive community consultations over 2016-2017 and we found that what our people value the most is our clean air, water and access to nature and value being good stewards of these things. These values are enshrined in our document www.sustainablesalmo.ca Having every resident personally drive to a depot to deposit their recycling not only reduced recycling rates, but also increases GHG emissions and compounds an existing problem.</p> | |



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| | | <p>Our community, in particular, has submitted a "community expression of support for curbside recycling" to Recycle BC with 178 signatures. We were further told in May of 2015 that we on the waiting list for curbside recycling and promised that to our community and pleaded for their patience while we waited for our turn to come up to initiate negotiations with Recycle BC.</p> <p>Now we have been told that day may never come. Please register our objection to this and sincere hope that you will reconsider this policy position.</p> | |
| Regional District | Curbside Collection | <p>Proposed Payment Structure and Rates Under your proposed rate structure, the Capital Regional District's (CRD) financial incentive would increase from \$37.00 to \$40.65 per household (HH) a year. We are pleased to see an increase in the incentive rate; however, the rate will be fixed for the next five years. This does not reflect rising costs associated with collection services. We ask that you index the rate annually, based on the Consumer Price Index.</p> <p>Proposed Reduction in Service Administration Top-Up Rate You are proposing to reduce the service administration top-up rate from \$2.50 to \$1.10 per HH a year as you are removing reporting requirements in the new collection agreements. However, at the same time you are adding new service requirements which will result in more administrative work for our staff. We believe that the current top-up rate should be maintained or increased.</p> <p>Curbside Collection Performance Bonus In the past three years, the weight of PPP collected in the CRD's blue box program has remained consistent at 150 kg of PPP per HH per year, despite a reduction in materials such as newspapers and an increase in the number of households. You are proposing to pay a performance bonus of \$1 per HH starting at 160 kg per HH. This appears unattainable. The CRD program is very successful with high participation. We propose that you adjust your performance bonus to reflect the universal reduction in capture rates of kilograms per household across the province due to lighter material weights.</p> | |
| Regional District | Curbside Collection | <p>Boundaries: The CVRD curbside program services 13 000 homes and approximately 6500 homes are serviced outside the 60 km boundary that defines where Recycle BC is responsible for getting curbside material to the processor. The cost to the program is</p> | |

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| | | <p>significant as the collection program is charged \$35 a ton to have the curbside material transferred to the processor in Nanaimo. The CVRD would like to see Recycle BC use distance from home as the boundary line as the CVRD boundary is 9000 square kilometres and the boundaries are not a fair representation of where the actual service takes place. Electoral Areas A, B, C, F and I all have homes outside the 60 km boundary.</p> <p>Further the CVRD requests that 60 km boundary be lowered or scaled to reflect the reality of curbside collection. Many routes require the collection trucks to dump twice in one day and having a curbside truck travel 240 kms per day to service a route is a significant barrier in terms of time and expense to service a route. On a ten hour day you could see a curbside truck travelling up to 4 hours to just dump loads. That would see up to 40% of the CVRD collection routes spent driving to and from the processing plant. The CVRD sees the 60 km boundary as an unusually high burden to place on a collection program and request that it be lowered or a scaled system could be introduced.</p> <p>Given that due entirely to the Regional district boundary being less than 60 km away from the processor this adds \$56 000 per annum to transfer material to the processor that Recycle BC share in that expense. This \$56 000 represents 13% of the per home rebate that is currently provided to the CVRD for curbside collection.</p> <p>Proposed New Rebate: The proposed curbside collection rebate per home does not fully cover the operating expenses of the program. In fact, the CVRD still issues utility bills to all residents for recycling collection. The rebate dollars only cover the fuel and labour to run the program. The cost of maintenance and repairs of the three trucks is not covered by the program nor is any of the administrative costs to run the program. There are other expenses such as land, office space used to store and maintain the trucks and staff that are not covered by the program.</p> <p>These issues could be assisted through fuel surcharges, maintenance allowances and infrastructure assistance.</p> | |
| Local Government | Curbside Collection | Good idea to net out contamination from the bonus calculations. We are concerned with how contamination is calculated: | Contamination scorecards provided by Recycle BC will break down the Overall Non-Targeted |

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| | | <ul style="list-style-type: none"> Is there a way to provide a weighting mechanism to materials such that contamination rates better reflect the level of contamination? | <p>rate by various types of contamination, including Non-PPP, Commingled Glass, Unsortable, Plastic Bags and Overwrap, Contaminated PPP – Non Hazardous, and Foam Packaging. The sum of these six different rates will also be shared and represents the Overall Non-Targeted rate. This breakdown of the different contamination types will help collectors understand their performance within each of the contamination types.</p> |
| Anonymous | Curbside Collection | <p>Recycle BC proposes to increase the incentive rates based on collector collection programs. The proposed incentive rates for single stream collectors using automated carts has been increased by approximately 4% for curbside and 8% for multi-family, which is lower than other curbside groups given the lower ongoing collection cost associated with automated cart-based systems and the high levels of contamination typically found in these systems.</p> <p>Furthermore, Recycle BC is proposing to provide a higher service administration top-up rate to those local governments and First Nations that operate curbside recycling programs using local government or First Nations employees as collection staff, compared to those that contract collection services to an external service provider, given the increased administrative costs associated with managing internal collection employees.</p> <p>Our concerns are as follows:</p> <ul style="list-style-type: none"> Contamination is covered through a separate mechanism in the contract (penalties) which seems that Recycle-BC is doubling dipping through lowering single-stream incentives and performance bonuses; | |

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| | | <ul style="list-style-type: none"> • Need to consider mobility or transportation inflation or flexibility to include new mobility costs • There is still an additional cost component for maintenance of automated carts; • There are still significant contract administration costs which include overseeing day-to-day contract operations, processing progress payments, cart management, customer service, addressing collection failures. • It seems by reducing incentive for separate cardboard bins at MFD's is punishing the collectors for decisions that strata councils and property managers make regarding the management of their waste. <p>Recycle-BC requires advance approval by Recycle BC of a detailed transition plan in order to change recycling container type. Approval will not be reasonably withheld upon receipt of plan. Additionally, you are proposing inclusion of Recycle BC logo on additional collection containers or replacements moving forward. Recycle BC will reserve the right to approve hot-stamps or other design features of collection containers. Our concerns are:</p> <ul style="list-style-type: none"> • Single-stream municipalities have invested significant money into the cart based system • To change carts would be significant cost implication and may be out of scope with our automated waste collection program. • Carts are typically interchangeable amongst the various streams of waste collected. • The Recycle BC requirement that they reserve the right to approve hot stamps and design features will have a significant impact on cart management operations and well as increase costs. • What happens if Recycle-BC dissolves? <p>Recycle BC proposes it will exercise its right to develop a methodology to net out non-packaging and printed paper and commingled glass from calculation of capture rate when calculating applicable bonus payments. Our concerns are:</p> <ul style="list-style-type: none"> • We are paying for contamination through a separate mechanism in the contract (penalties) which seems that Recycle-BC is doubling dipping. • View this as challenging and difficult to do. | |
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| | | <ul style="list-style-type: none"> • If intention is to use average contamination, this will not work for all loads as each route/area | |
| Local Government | Curbside Collection | <p>The City of Salmon Arm is currently running a single stream curbside collection process with single use clear bags. We acknowledge Recycle BC's concerns regarding the use of single use plastic bags for a variety of reasons including manual processing and environmental concerns. The City, however, wishes to continue to use the bags for the collection container until a suitable alternative is readily available on the market (ie. a see-through reusable bag). Our reasons for this request are as follows:</p> <ul style="list-style-type: none"> • The largest opportunity the City has for reducing our contamination rate is curbside enforcement by the contractor. Clear bags offer an opportunity to review the materials unmatched by any other collection container (blue bins and opaque reusable bags offer a look at the TOP only, carts offer no opportunity to review). Reducing contamination is a high priority to Recycle BC, affects your bottom line in resale value, and as such it seems short-sighted to ban the use of clear bags without a suitable alternative. • Open bins, the next best option for contamination rates, require a significant amount of plastic to create, are not recyclable through Recycle BC's program and significantly contribute to neighborhood littering, making them arguably less beneficial to the environment than the bags. Additionally, they do not offer a solution for excess materials and the majority of our residents put out material in excess of one bin per collection and collectors generally do not seem enthusiastic about the bins for their own operational reasons. • We note that Recycle BC is offering a staggered payment rate for the different types of containers. This suggests that Recycle BC is already making up the increase in operational costs for the manual bag opening by paying collectors less. This is fair considering the extra time and issue the bags cause for Recycle BC processors. <p>In conclusion, the City is petitioning to continue the use of the single use clear bags indefinitely into the future until such time as an EQUIVALENT reusable alternative is available on the market in order to continue to provide Recycle BC with low contamination rates. We feel that the staggered payment rates offered by Recycle BC</p> | |



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| | | are fair given the additional processing issues created by the bags and that the reduced payment should offset the concerns provided by Recycle BC. | |
| Local Government | Curbside Collection | The City is worried about the proposal to phase out use of blue bags. If this change is implemented, than the City will need to purchase different collection equipment and collection methodology. Currently the City is able to collect garbage bags and recycling bags utilizing a split truck with manual loading on a bi-weekly basis. Prior staff experience with open blue bins at curbside leads us to believe that lidded carts will be required, necessitating automated pick up. The City has been looking at a number of different automated pieces of equipment but has not to date been able to identify a piece of equipment that is believed would feasibly allow for biweekly pickup. At this point we are concerned that we will need to switch to the cart style pick up on a weekly basis. Unfortunately, this approach appears to require a doubling of our collection efforts which the City is concerned will equate into doubling our collection costs. | |
| Local Government | Curbside Collection | <p>Thanks again for providing us with the opportunity to participate in the recent Public Consultations in New Westminster. As I expressed to you at the conference I have a few concerns with the proposals Recycle BC presented and so I am sending them to you in writing as requested.</p> <ul style="list-style-type: none"> • The elimination of Blue Bags in our community will not be well received by our citizens. Recently we asked several groups about switching to a cart based curbside collection system and the over whelming response was NO. Our elderly citizens find carts cumbersome, hard to maneuver and difficult to store and they are adamantly opposed to any sort of container based curbside collection system. We are also of the opinion that implementing this home based source sorting will drive residents to simply place recyclable items in the garbage entirely defeating the goal of recycling. The Town of Osoyoos is also entering into a new curbside collection contract within the next month which has pricing based on our existing blue bag curbside collection system. We are not sure what effect your forced elimination of our blue bag program will have upon pricing in this new 7 year contract. At the very least the Town will have to purchase and distribute blue bins to all residence which will result in a substantial cost for our very limited | |

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| | | <p>operations budget. Will Recycle BC be administrating the maintenance and distribution on these new blue bins or will this be something which will be downloaded to the Town of Osoyoos?</p> <ul style="list-style-type: none"> The proposed elimination of fees for depot collection of fibre will also not be well received by our community. Our community frequently utilizes the large 40 Yard container at our Landfill to dispose of fibre and the elimination of this service will certainly be noticed by the citizens. | |
| Local Government | Curbside Collection | <ul style="list-style-type: none"> No inflationary rise in rates over contractual period put too great a risk with the Municipality, would prefer to see some form of inflationary mechanism, built into new contracts. More detail required as to requirement for collectors policy on tagging with a view that this should not result on a greater burden being placed on the Municipality. No objection to use of Recycle BC logos so long as it does not place a greater burden on the Municipality. Concerned over use of logo should it not outlive the life of the asset (blue box/gags). No objection to approval of promotional material with the provision that any approval will not hinder Municipal operations. Reduction in administrate top up does not recognize work being done by Municipalities and requirements for future checking and approval of promotional materials - rates should remain as previously set as a minimum. Bonuses (KG/household) are almost impossible to achieve and with a reduction in packaging from suppliers and resident education reducing packing at curbside this should be reconsidered - link contamination rates into the bonus system, deposit glass should not be netted off against total weight. | |
| Anonymous | Curbside Collection | <p>Require Recycle BC approval of policy on tagging contaminated material at the curb and tracking of associated metrics. Additionally, Recycle BC can exercise its right to require advance approval of significant promotion and education materials, including annual recycling guide/calendar, regardless of whether it includes the Recycle BC. Our suggestions:</p> | |

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| | | <ul style="list-style-type: none"> • Prefer that Recycle BC work with collectors (given the diverse nature of each municipality) to determine best approaches for tagging based on individual community. • Recycle BC should develop and research best practice approach and criteria (that can be tailored to different community programs) developed to ensure that education through tagging and non-collection of contaminated carts is successful and it results in behavior change amongst residents towards properly recycling. • We would rather prefer that Recycle BC work with collectors to develop applicable material instead of mandating approval. We view this as partnership not one-way direction. • Potential delays to publishing materials could arise. Require timelines to be established with Recycle BC for response and should solely be for recycling. | |
| <p>Producer (Steward)</p> | <p>Curbside Collection</p> | <p>The Clorox Company of Canada Ltd. has been a registered steward under the Recycle BC program since the program’s inception. Additionally, we have a long established history of supporting British Columbia municipalities since the early 1990’s with the design and implementation of highly successful waste diversion strategies that include the utilization of the GLAD® See Through Blue Bag. Our Glad® brand is the category leader in the trash space and Glad® is Clorox Canada’s largest revenue business, playing a critical role in supporting 377 direct and approximately 1,200 indirect Canadian jobs.</p> <p>We are writing today to voice our strong opposition to the proposed 18 month transition away from bags and ask that this stipulation be struck from existing and future contracts between Recycle BC and its municipal partners.</p> <p>As a steward facing a double digit cost increases to our stewardship fees in BC next year, we don’t support the elimination of a waste management solution that has been shown to have lower all-in operational and capital costs than either carts or blue boxes with similar, if not better, diversion and contamination rates.</p> <p>Looking forward, China’s National Sword initiative has changed the dynamic for end markets that the program has relied on for the recovery of approximately 20% of its costs. While Recycle BC has chosen not to increase tonnage rates this year and dip into reserves, the demonstrated ability of none of the present cart, bag or blue box</p> | |

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| | <p>curbside collection strategies to hit the extremely low contamination rates being demanded by the Chinese, make the viability of this strategy suspect and the likelihood of additional cost increases highly likely. In this scenario, elimination of provincial markets for blue recycling bags as we work with partners from Green by Nature to investigate the opportunity to become a potential domestic off-taker of post-consumer resin is counterproductive to the goal of a domestic circular economy. Additionally, transitioning out of bags eliminates important sources of revenue for the very stewards that support your programs that sell either branded, as is our case, or private label blue recycling bags in the province. This business supports well-paying jobs for hard working Canadians, generates tax revenues at the local, provincial and federal level, as well as investments in manufacturing and R&D here in Canada. Presently, communities across British Columbia including the District of Mission, Abbotsford, Chilliwack and Salmon Arm have implemented highly successful recycling collection programs that include the use of see through blue bags. The option to use bags is popular with residents and municipal waste systems alike because they are scalable, easier to manage for disabled or elderly residents, resistant to wind and don't take up a lot of increasingly dear space in BC homes and garages as they can go directly from the kitchen to the curb. Residents in these communities should continue to have the option to use bags.</p> <p>Even municipalities with cart-based systems have voiced the support for the use to bags for surge capacity. Why should recycled material end up in the trash when there is an easy option available to keep this material out of the landfill? Additionally, bags should be viewed as a complement to blue boxes in communities where this approach is used as they can help solve wind and surge capacity issues, can go seamlessly from the kitchen to the curb and can help improve the quality of the recyclables in the boxes.</p> <p>Recycle BC's proposed move to promote a blue box system as the preferred choice for curbside collection was preceded by a similar approach in Ontario in the 1990s and 2000s. B.C. can learn important lessons from their experience. Today, Ontario municipalities continue to wrestle with the limitations of blue box systems beyond their lack of all-in cost-competitiveness, specifically: litter issues caused by wind and</p> | |
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| | | <p>limited scalability. Subsequently, Ontario is experiencing a resurgence of interest in evolving programs to enable residents to utilize see through blue bags to place recyclable contents curbside either with blue boxes or as a stand-alone. This spring, the region of Halton, Ontario decided to allow residents to use recycling bags to collect and store their recycling materials for collection. Other jurisdictions across the country, like those in Atlantic Canada continue to expand curbside blue bag recycling programs.</p> <p>In analyzing the processing side of the equation, separating a collection mechanism or tool (blue recycling bag) from waste (shopping bag) is critical. Any survey of MRF operations will show that the overwhelming majority of the bags getting wrapped around machinery are shopping bags not blue recycling bags. As such, blue recycling bags shouldn't be made the culprit for down time at municipal recycling facilities. Investments in bag breakers or additional sorting staff to better accommodate recycling bags will also help deal with the shopping bags (which are the real issue) and pale in comparison to the capital investments necessary to implement cart or blue bin programs.</p> <p>We thank you for the opportunity to provide our feedback and look forward to the opportunity to continue the dialogue with Recycle BC about this proposal.</p> | |
| Local Government | Multi-Family Collection | <p>Good idea to net out contamination from the bonus calculations. We are concerned with how contamination is calculated:</p> <ul style="list-style-type: none"> • Is there a way to provide a weighting mechanism to materials such that contamination rates better reflect the level of contamination? • Contamination reduction is a challenge across the board with multi-family sites. It would be great if Recycle BC provided research and best practices for reducing contamination. | |
| Local Government | Multi-Family Collection | <ul style="list-style-type: none"> • No inflationary rise in rates over contractual period put too great a risk with the Municipality, would prefer to see some form of inflationary mechanism, built into new contracts. • More detail required as to requirement for collectors policy on tagging with a view that this should not result on a greater burden being placed on the Municipality. | |

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| | | <ul style="list-style-type: none"> • No objection to use of Recycle BC logos so long as it does not place a greater burden on the Municipality. • Concerned over use of logo should it not outlive the life of the asset (blue box/gags). • No objection to approval of promotional material with the provision that any approval will not hinder Municipal operations. • Reduction in administrative top up does not recognize work being done by Municipalities and requirements for future checking and approval of promotional materials - rates should remain as previously set as a minimum. • Consider increased educational top up/household linked to recorded reduction in contamination from multi-family - incentive to do more to get more. • Bonuses (KG/household) are almost impossible to achieve and with a reduction in packaging from suppliers and resident education reducing packing at curbside this should be reconsidered - link contamination rates into the bonus system, deposit glass should not be netted off against total weight. • Cardboard is going to be a major issue if reductions are placed on the Municipality if collected via a different stream - Municipality has no control over who collects or records. • Who will fund the purchase of any containers required to collect cardboard. | |
| Regional District | Depot Collection | <p>Proposed Payment Structure and Rates</p> <p>The proposed per tonne incentive rate increases for some materials and the new baling incentive are welcome but do not come close to covering the cost of collecting PPP at Gulf Island depots in our region. We understand that Recycle BC's original per tonne incentive was based on data from private and public depots in the province which are not comparable to the unique service model provided by non-profit recycling societies on the Gulf Islands. We ask that your plan adequately provide for paying the costs of collecting and managing PPP at those depots, as stipulated in the BC Recycling Regulation.</p> <p>Proposed new Approach to Depots in Areas with Curbside Service</p> | |

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| | | <p>Your new approach to depots in areas with curbside service creates an uneven playing field between private and public depots. You are proposing to eliminate incentives for the collection of fibres and containers for local government and First Nations depots only, but plan to continue offering applicable incentives for the same materials if they are collected at private depots. The same approach should be used for all depots in areas with curbside service, regardless of type of ownership.</p> <p>We understand that there may be some duplication of service at depots in areas with curbside service. The best indicator of whether a depot is worthwhile is the PPP tonnage received. The CRD's Hartland recycling depot is located in an area with curbside service and collects about 600 tonnes of PPP a year; thus indicating demand for the service. The CRD has surveyed users of the depot twice and found that 93% are residential. The Hartland depot provides a needed service for unusual situations like a household move, clearing an estate and the Christmas season to deal with large volumes of PPP that cannot practically be put at the curb due to time constraints and/or volumes and would exceed the usual truck capacity. We ask that you reconsider your approach to depot services in curbside collection areas based on the merit of the depot's contribution to increasing the PPP recovery rate.</p> | |
| Regional District | Depot Collection | <p>Removal of incentives for depot collection of PPP: The CVRD strongly discourages Recycle BC from removing the incentives for paper and containers from government run depots. Recycle BC stated that the impetus for changing incentives was to encourage the public to recycle paper and containers at the curb rather than at the depot. We fail to see how the reduction in incentives will change public behavior. If depots stopped accepting this material, citizens would be paying the same amount of taxes and see a direct reduction in their service. Rather than encouraging a change in behavior, this would lead to public outcry and political backlash. There is clearly a need and desire for the public to have access to the depots as the tonnages collected at depots can attest.</p> <p>At the CVRD, the recycling depot facilities are run on the principle that they are one-stop shops for accepting all recyclable items. The CVRD has been working on long-term behavioral change through education and outreach to encourage citizens to recycle</p> | |

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| | | <p>only paper and containers at the curb to reduce contamination, but that all waste is accepted at the depots. It is unfeasible that CVRD stop accepting paper and containers at its depots. The expense of the labour and capital requirements to ensure that the CVRD is meeting Recycle BC requirements for paper and containers is greatly assisted by the revenue attached to these waste streams. The depot revenue received will be reduced by \$30,000 and this will have to be made up through reductions in other services. The CVRD is interested in meeting the diversion targets set out by Recycle BC through behavioral change relating to public recycling with the ultimate goal to encourage citizens to recycle paper and containers at the curb, funding for communications and education and should be implemented rather than removing material incentives.</p> | |
| Local Government | Depot Collection | <p>Currently, we are essentially the ones providing advertising for Recycle BC depots. Who should be covering this cost? Other municipalities may run the Recycle BC depots in their area, but we do not in our case. Perhaps greater incentives are needed for depot advertising.</p> | |
| Local Government | Depot Collection | <p>The City understands that Recycle BC is proposing to discontinue the mixed paper and containers financial incentive for local government recycling depots in communities that receive curbside recycling collection. Local governments have made investments in providing “one-stop” facilities to further waste diversion, and many have invested in facility upgrades to meet Recycle BC standards. Depots operated by local governments provide residents with an opportunity to drop off material that exceeds the size or quantity suitable for curbside collection, and offer recycling opportunities for residents that do not receive municipal curbside service, such as the multi-family sector in Abbotsford.</p> <p>The Abbotsford Mission Recycling Depot (AMRD) drop-off depot is part of the Recycle BC network and is jointly owned by the City and the District of Mission. The proposed changes to the depot agreements would create an uneven playing field between the private and public sector, place additional cost on local ratepayers and result in a significant loss in revenue for the AMRD. In addition, the City expects to provide residents with the collection of mixed paper and containers at this depot as part of the basic service levels expected at all depots in the Recycle BC network.</p> | |

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| Local Government | Depot Collection | <ul style="list-style-type: none"> • General issue of residential recycling and cardboard being refused at Depot's will cause general upset amongst residents and complaints to Municipalities. • No objection to use of Recycle BC logos so long as it does not place a greater burden on the Municipality. • Concerned over use of logo should it not outlive the life of the asset (blue box/bags). • No objection to approval of promotional material with the provision that any approval will not hinder Municipal operations. • Depot proposals for Level 3 depots are unacceptable and need to be completely reviewed with an alternative model being presented. Some residents prefer to use depot rather than curbside as they produce large amounts or from time to time (Christmas) produce large amounts of cardboard not suitable for curbside collection. | |
| Private depot | Depot collection | <p>There should be an increase in handling fees for products, especially for glass jars. It takes up too much space in the Depot.</p> | |
| Recycling society (depot) | Depot Collection | <p>Recycle BC views the recyclables Depots collect as a commodity and pays for them as such. Depots provide a service, and the cost of providing that service is in no way correlated to the value of the material. Please accurately determine the cost of collection for depots for different materials (e.g., Styrofoam, soft plastics, paper products containing a liquid) and pay accordingly. Pass the cost of collection on to producers, as the BC Recycling regulation sets out.</p> <p>Most Depots are underpaid for collecting these materials. On the Gulf Islands, we do an excellent job of providing the service at a very low cost. Trucking fees more or less cover our trucking expenses, so our remote location is not really what is driving the financial shortfall. We are simply underpaid for the service we provide. Bailing incentives also do not cover the cost of bailing.</p> <p>Recycle BC is proposing to pay Depots the same low rate for collecting multi-laminate plastic as for collecting soft plastic. If we are underpaid to collect the material, this savings is passed on to the producer who can continue to use the material at a discounted rate. The cost of recycling packaging needs to be built in to the cost of</p> | |

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| | | <p>using it, and that can't happen if we are paid for the materials value rather than the cost of collection. Producers use these materials at Depots expense.</p> <p>A lot of these low value materials are collected primarily at Depots, and without Depots, these materials would end up in landfills, roadsides and bodies of water; thus Depots provide an invaluable service.</p> | |
| Recycling society (depot) | Depot Collection | <p>Paying Island Depots (no curbside here) so much less to do so much more than curbside is a travesty! We give more service to the public by being here five days a week, take curbside materials plus plastic film, expanded foam, and glass. The materials we bale save shipping on those materials by more than 90%. Those savings alone amount to much more than we receive from Recycle BC. As we bale at a ratio of at least 10 to 1...our Plastics Roll-off Bin (22 trips this year) would have been at least 220 trips in loose form. That alone saves you folks \$90,000 a year! We service 6000+ households plus have a large population living on boats. The app \$55000 per year paid for PPP service by Recycle BC = about \$9 per household per year. Our Cost for PPP service alone is \$40 per household. This is most certainly not "fully funding PPP collection throughout the Province". The Capital Region is not obliged to subsidize us and probably will not in the future. While Recycle BC has done an outstanding job of taking over responsibility for PPP collection in BC, you seem to have totally misjudged the Gulf Island section and in effect, have put a death sentence on Depots that are probably the most efficient around. Why is a household on Salt Spring worth only \$9 a year??? It is actually quite insulting. Even with new improved funding outlined in the Meetings..we will still be far far from sustainable. Our other EPR funders are paying their share, why not Recycle BC?? We love working with you folks but there has to be some equity here. Thanks for the opportunity to provide feedback.</p> | |
| Recycling society (depot) | Depot Collection | <p>The Depot presentation was disappointing. Depot operators repeatedly asked why Recycle BC didn't want to pay for cardboard collected from Depots in areas with curbside collection. The Recycle BC presenter said that Recycle BC wanted to avoid a duplication of service. When operators questioned this logic and pointed out that the product collected at Depots was cleaner, drier and less contaminated, the presenter still insisted that residents shouldn't have any reason to bring their cardboard in to Depots. Operators offered several possible reasons why residents might choose to</p> | |

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| | | <p>bring their cardboard in to Depots (moving, large clean out of basement, etc.) and why this might be advantageous to Recycle BC (less trips back to the unloading station for the collection trucks; cleaner, drier product, etc.) with no real conversation on the Recycle BC representatives part. The conversation went back and forth and back and forth - until finally she commented that Recycle BC doesn't want to fund the collection of ICI material, which could be being dropped off at Depots.</p> <p>That sounds like the real reason Recycle BC doesn't want to pay for Depot cardboard in areas where there is curbside collection, and any Depot can understand this concern. However, if the conversation with Recycle BC isn't open and direct, we can't get to the root of the concerns Recycle BC has in representing Producers interests, and also, the concerns that Depots have in collecting recyclables and being fairly compensated for it.</p> <p>In a true consultation, Recycle BC and the Depots collecting cardboard in areas with curbside collection could work out the pros and cons of Depots in areas with curbside service continuing to collect cardboard. However, if Recycle BC withholds their concerns and no real dialogue happens, then the relationships between Depots and Recycle BC become strained. Only in partnership with the recycle Depots, can Recycle BC fulfill its obligations to producers in the most cost effective and environmentally sound manner.</p> | |
| <p>Recycling society (depot)</p> | <p>Depot Collection</p> | <ul style="list-style-type: none"> • Small rural depots need additional funding. The current funding is inadequate. • Small rural depots need an alternative to funding by tonnage. Unless the plan is to starve these depots to death, a better system needs to be found during this round of consultation. Small depots are producing a product with very low contamination. The average contamination (contamination plus non-recyclable material in the program) rate of 15% (from the contamination seminar) means we are saving you 15% on your costs per tonne by our lack of contamination. (This doesn't even include the cost to the processor (ultimately born by RBC) of one hour in down time per every four hours of operation needed to unplug the incorrectly recycled plastic bags from the sorting line. There are virtually no miss-sorted plastic bags coming from our depots to plug up the sorting lines in the processing plants.) In addition, by baling almost all the products we can, we are | |

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| | | <p>saving GBN and ultimately RBC a huge amount in transportation costs. Because the baling incentive doesn't fully cover the cost of baling, we are spending money to save you money.</p> <ul style="list-style-type: none"> • Waste to Energy (dressed up as engineered fuel) is something that needs to be avoided. While it is superior to landfill, it offers producers a non-recycling stream that should not be present in a recycling program and must be discouraged. The producer payment for this material must be increased substantially to discourage the use of this non-recyclable material and its subsequent use for fuel. Because it is such a low weight alternative, the waste to energy option and relatively low producer payment encourages its use rather than discouraging it. This must be changed. • Producers' fees need to be significantly increased for styrofoam to discourage its use. There are other ways to package breakables, and they need to be encouraged over the lightweight and therefore cheap (cheap for the producer and expensive for the environment) alternative of styrofoam. • Soft plastic needs substantially higher producer fees. According to the contamination seminar, miss-sorted plastic bags cause sorting lines to be shut down 25% of the time. That means that 25% of sorting costs are attributable to soft plastic. That cost should be borne by the producers/users of the material. | |
| <p>Recycling society (depot)</p> | | <p>Recycle BC's evolving Packaging & Printed Paper (PPP) program is still missing a depot group: Isolated, PPP Primary.</p> <p>The Pender Island Recycling Society's (PIRS) recycling depot is accurately described by this depot label: PPP collection is our primary function, rather than ancillary as is the case with Encorp bottle depots. PIRS' recycling depot has fixed operating costs in collecting PPP regardless of the other recyclables accepted at our facility. Our depot is efficient; at every turn, trying to deliver services in an economical and environmental responsibility manner. Visits by Recycle BC, CRD, and GBN staff concluded the same thing: "No other efficiencies to be found here." (Note: Funding of non-PPP services and our "Reduce and Reuse" initiatives are independent of PPP collection financing.) In addition to per tonne incentive financing paid to the Capital Regional District (CRD) for PPP collection by our island depot, baseline funding needs to be provided to the</p> | |

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| | <p>CRD to cover the fixed costs of PIRS collecting PPP from residents on the local government’s behalf. This baseline funding from Recycle BC would not vary with the tonnage of PPP collected (our PPP tonnage is principally fixed due to our isolation). While the proposed Recycle BC Incentive Rates (\$/Tonne) for depots would increase revenue to the CRD by 11.5% (for the PIRS depot operation), the total dollar figure generated still falls far short of the funding necessary for Pender Island Recycling Society to deliver efficient and entitled packaging and printed paper collection to Pender Islands’ residents. Proposed Group 1 No Curbside/Multi-Family Applicable Incentive Rates would cover only 20-30% of PIRS’ annual operating costs in collecting PPP (costs that are likely going to increase with a focus on heightened product quality).</p> <p>Recognizing an additional depot group type and adding a baseline funding component is central to Recycle BC providing appropriate funding for the collection of PPP by Pender Island Recycling Society and the other Southern Gulf Islands Recycling Coalition (SGIRC) depot operators. The relatively small amount of additional income needed for Recycle BC to provide this baseline funding to the CRD for PPP collection on the Southern Gulf Islands can be easily offset by a small increase in fees paid by PPP producers, in particular those using non-recyclable or difficult to recycle packaging. During Session 4 Depot Collection, Recycle BC’s Jordan Best said: “. . . of course we need to properly support the [Southern Gulf Islands Recycling Coalition] depots.” He was unable to answer when I asked: “At what percentage of our PPP collection operating costs does “properly support” equate to”</p> <p>Recycle BC should keep in mind that Pender Island Recycling Depot, and the other SGIRC depots, collect PPP at a higher rate than most other residents of British Columbia (53.3kg vs 40.7kg - Recycle BC 2016 Annual Report) and with very low contamination rates (saving Recycle BC a substantial amount of money).</p> <p>The late (and truly missed) Ann Johnston would have made several comments about the “updated: Recycle BC program. Two of these points would have been:</p> <ol style="list-style-type: none"> 1. Southern Gulf Islands residents MUST NOT pay twice for PPP recycling collection (a core principle of the B.C. Recycling Regulation); SGIRC members continue to argue that the CRD subsidy provided to its depots for PPP collection, to top up the underfunding | |
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| | | <p>by Recycle BC, is a double charge of consumers: therefore in breach of the B.C. Recycling Regulation.</p> <p>2. In all of this debating, we MUST NOT lose sight of the provincial pollution prevention hierarchy. (BCRR 5(3): pollution prevention is not undertaken at one level unless or until all feasible opportunities for pollution prevention at a higher level have been taken: (c) reduce . . . and (d) reuse the product; that the PPP producer must be deterred from using difficult to recycle or non-recyclable packaging. And, waste-to-energy should be an expensive option.</p> <p>During Thursday morning's Contamination workshop, Recycle BC's Bill Patton proudly pointed out the Recycle BC slogan: Making a difference together. He then said: "We really believe this . . . [working cooperatively with] residents, producers, collectors, and post-collection partners and other stakeholders."</p> <p>Ann Johnston would have replied: "Show us the money; that our island residents are entitled to." And: "Your slogan would better read - Making the environment healthier together."</p> <p>Please let me know if you would like to discuss the content of this feedback submission further.</p> | |
| Regional District | Depot Collection | <p>The Alberni-Clayoquot Regional District (ACRD) operates 2 Recycling Depots (run by contractors). One located in the City of Port Alberni and one at the Alberni Valley Landfill which is located in the Sproat Lake Electoral Area. Both depots have a high volume of traffic and material collection.</p> <p>The depot located in the city is used by multi-family residents and residents of our Cherry Creek Electoral Area, and of course by everyone who recycles their foam packaging, plastic bags and overwrap and glass bottles and jars. This Depot also hosts many of the other stewardship programs who are contracted out with the contractor who runs the depot. This depot bales all material, which is a very efficient method to transport the material to the mainland.</p> <p>The depot at the Alberni Valley landfill is used by residents of Sproat Lake and other multifamily residents in the area of town. This depot does not bale any material; it is all hauled in mega bags to the mainland.</p> | |

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| | | <p>Both depots are supported by the Regional District and Recycle BC incentives. The ACRD provides curbside collection to the City of Port Alberni single-family residents and the Beaver Creek Electoral Area. We do not provide or ever will provide curbside pick up to any multi-family residences as this is not in our jurisdiction. Therefore, the only option is to run depots to provide the opportunity for recycling.</p> <p>The ACRD purchased the property and building to operate the depot in the city. We pay the contractor to run the facility and we pay for all of the upgrades and maintenance. We do not make any money running the depots. Removing the incentives we receive for Categories 1, 2, 3b and 3a, 6, 7 would put a huge cost on the Regional District. One, which may force the ACRD to close the sites. These services are not part of the tax requisition of the ACRD or the City of Port Alberni.</p> <p>Please do not eliminate these depot incentives, it would be a huge step back for the Recycle BC program, as there would be limited recycling opportunities to a great portion of the Alberni Valley.</p> | |
| <p>Recycling society (depot)</p> | <p>Depot Collection</p> | <p>Thank you for the opportunity to give feedback. With regard to depot collection, with respect to all-inclusive depots in “remote” areas (i.e. areas where no other recycling services exist or can be accessed owing to geographical situation), the funding model which you present, even with the proposed increases in returns from cost of living increases and the addition of new categories and consequent incentives, is completely inadequate for us to continue operation.</p> <p>At the present time you are providing, on a tonnage analysis, approximately one fifth of our operating needs. This leaves our depot in need of “top up” funding from our regional district (double dipping) as well as community memberships and donation/fundraising to make our depot viable. The increases in baling incentives which you offer will only mean the shift of this income from GBN to the collection side of the register. The additional funds for tonnage collection is only a cost of living increase. We need more money for our depot’s existence in the first place.</p> <p>Depots such as ours were founded and offer a complete range of PPP recovery, including the styrofoam, glass and plastic bags which are unavailable to curbside residents, except at designated depots in their communities. Our collections are</p> | |

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| | <p>cleaner and result in far less contamination than curbside pickup. As well, these depots are the only game in town for any sort of recycling and, consequently, save our environment from the dumping of these items as garbage should our depot not exist. Given that your programme was to offer a “seamless” transition (BC regulation statement) from our previous contract with the CRD and that we have received numerous fruitless examinations of our depots for operational efficiencies, i.e. no further efficiencies could be suggested, we suggest that depots such as ours need to be placed in an entirely new and separate depot designation with the realization that ours is an economy of scale that cannot exist on tonnages produced. I note that the curbside programme has no reference to such a measuring stick. Further, as PPP continues to evolve. Packaging weighs less and becomes more bulky. Added to this problem is the need to sort and place apparently recyclable PPP materials in the garbage stream at present, an additional cost to our depots. I am hopeful that with the addition of a category 9, a good portion of this problem will be addressed. However, we cannot rely on present practices to change in a sufficient and timely fashion to solve the problem. There needs to be some sort of pressure that can be applied by your organization to effect change in the behaviour of its members. How can this be done? Greater participation fees, fines?</p> <p>Our community members want to recycle. They honour the first two aspirations of the recycling hierarchy, reduce and reuse, incorporate OCB, glass, newspaper and plastic containers in their daily lives in gardens and workshops. Given that consumerism on the ever increasing scale that exists, is a threat to the existence of our planet, such behaviour should be acknowledged.</p> <p>In your mission statement you pledge ‘To be a trusted environmental advocate and community partner offering equitable, effective and efficient residential recycling services.’ For us on Galiano Island, this would mean finding a different formula and designation for our depot which would provide us with a realistic operating budget, so that we can continue to offer a high quality service to our residents who are citizens of our province and deserve a recycling programme which is equal to that offered to the greater provincial community.</p> | |
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| | | Thanks for the opportunity to express my concerns. The question I have is: CAN YOU PROVIDE US WITH GREATER FUNDING TO MATCH OUR NEEDS AND ENSURE OUR CONTINUED EXISTENCE? | |
| Depot operator | Depot Collection | Could you let me know how you came about formulating the new proposed incentive rates for depot collection in 2019? Also, would Recycle BC assist in financing balers or densification equipment? | <p>Recycle BC considered a number of factors when developing the new proposed depot incentive rates for depot collection, including feedback from depot collectors, value to the Recycle BC program of the depot network, industry standards, implications of new material streams (e.g. addition of other flexible packaging), market conditions and other factors.</p> <p>We will consider the feedback on financing balers and densification equipment.</p> |
| Regional District | Depot Collection | <p>Comments arising from the Nov. 15 webinar on proposed changes to the Depot Collectors Agreements</p> <ul style="list-style-type: none"> • The cost of insurance required by Recycle BC for Depots is not compensated at either the present or proposed incentive rates. • The cost of storing materials is not covered by either present nor proposed materials incentive rates. • The cost of providing staff over-site of the Recycle BC drop off depots is not covered by the present or proposed incentive rates • The increase in incentive rates proposed (Plastic, Styrofoam, glass) will not cover the costs associated with providing depot space, insurance, storage space, and staff time. • The proposed description of the different depot types discriminates against First Nations and Local Governments. Clearly Recycle BC would like to end their relationships with these service providers. | |

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| | | <ul style="list-style-type: none"> The proposed incentive rate for 'other flexible packaging' is not sufficient to provide staffing time, insurance, depot space or storage space. It does not appear that Recycle BC has researched why residents actually use depots. I would suggest that this be done prior to addressing a problem that may or may not actually exist. More research needs to be done before simply describing depots as a competing duplication for the curbside service. <p>The business model for Recycle BC is urban (quantity) biased. Most rural areas will not make the threshold for profitability. Yet the resident has paid the Recycle BC recycling levy and the tipping fee as the material inevitably ends up in the environment (landfill).</p> <p>This is a business model that does not work throughout all of BC.</p> | |
| Local Government | Three Years of Data | As a new community to the program we did not receive a data package but we are curious about how multi-family and curbside tonnages are determined when the materials are mixed in the truck? | Communities which collect a mixture of curbside and multi-family material in the same truck at the same time will see all of the tonnage of that truck reported as curbside tonnes. Only when the truck collects just multi-family material during any given route will it be reported as such. |
| Recycling society (depot) | Three Years of Data | How many tonnes (for each category) of styrofoam packaging, of soft plastic packaging, and of multi-laminate plastic packaging are used in BC annually? For each of these three categories, how many tonnes are recovered by Recycle BC? | Recycle BC does not report supplied tonnes or recovery rates to this level of detail. |
| Industry Association | Three Years of Data | Carton Council commends Recycle BC for sharing a large quantity of data during the 3 Years of Recycle BC Data workshop session. Missing from this body of data, however, are material-specific recycling rates. As you are aware, the packaging and paper stewardship programs in Quebec, Ontario, and Manitoba publish material-specific recovery rates on an annual basis. In all three provinces as well as in BC, these are in turn used to calculate material-specific fee rates. | Recycle BC does not report supplied tonnes or recovery rates to this level of detail. |
| | | Having this information would allow organizations such as ours to measure our progress in BC. It would also allow Recycle BC members (brand holders and first | |

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| | | importers) to report out against the targets they have set as part of their corporate social and environmental goals, as well as equipping them with the necessary information to address consumer enquiries on this matter. | |
| Regional District | Contamination | Contamination Bar (3%): Depending on the areas of service (rural vs urban, availability of curbside garbage service and other factors), Recycle BC should have a gradual goal of lowering the contamination, e.g. 10% or more should aim at 7% in 2 years and then 4% the following 2 years. Less than 3% will always be a challenge for automated curbside service. We understand the mounting pressure on Recycle BC, but we also need to recognize that human behavior will change slowly. Recycle BC branding and unified messaging for recycling by Recycle BC will help residents understand what is accepted in the blue bins and why. | |
| Regional District | Contamination | <p>Education and outreach: The CVRD sees the education and outreach funding from Recycle BC as insufficient for effecting long-term behavioral change relating to public recycling practices. The average resident of CVRD does not understand the details of Recycle BC items, and finds the difference about what's accepted at curbside, at depots, and not accepted at all very confusing. The CVRD recommends that Recycle BC have a standardized education and outreach plan for the program to help local government with their communications.</p> <p>Communication and education is crucial to reducing recycling contamination. Within the CVRD, the contamination rates within PPP recycling are high, and as a result staff at the CVRD work on paid staff time to sort and meet the needs of the Recycle BC program. Reducing the contamination rates within recycling, and encouraging public to recycle particular items at the curb while bringing others to depots requires sustained and penetrating education and outreach to make an impact. Studies show that education in the form of personal contact and feedback is the most effective for reducing contaminations rates (i.e. face-to-face contact at depots and tagging of recycling at curbside) and these programs are very costly. If CVRD is to meet the requirements of Recycle BC, funding for education and outreach must be sufficient.</p> | |
| Local Government | Contamination | <ul style="list-style-type: none"> Shredded paper in paper bags or clear plastic bags- we understand current rules, but we'd like some clarification on future rule plans (i.e. will everyone be going | |

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| | | <p>towards paper bags?) so that promotional materials are created using appropriate messaging for residents.</p> <ul style="list-style-type: none"> • We feel well supported by Recycle BC in contamination reduction work. Continued support by field representatives is important. • Could Recycle BC share detailed contamination reduction strategies by collection method (i.e. single stream auto carts) for areas that have seen success? It was good to hear about what other communities are doing in the workshops but a reference document would be helpful to refer to and help validate tactics in the field. For example, how much contamination should be tolerated before leaving a cart behind? • One of the suggested contamination reduction strategies is to witness material delivery at the receiving facility. Collection staff require a Recycle BC escort to enter the receiving facility. It would be helpful to be able to observe material delivery without requiring an escort. | |
| Local Government | Contamination | <p>The proposed changes to the curbside and depot collection agreements appear to result in more stringent contamination requirements. Based on the material presented at the workshop and subsequent discussions with collectors, the current contamination targets are difficult to achieve, and the proposed revisions will require increased education and costs for municipalities. The City recommends that curbside contamination thresholds be adjusted to more attainable levels, and that consideration be given to the sorting process that provides the final contamination level of materials prior to marketing.</p> <p>In addition, there is still resident confusion regarding items that are recyclable and those that are not, which further contributes to contamination levels. This is despite significant efforts by the City’s solid waste education program to guide residents in the transition to the Recycle BC program. The City suggests that items that are “recyclable” but not part of the Recycle BC program should not be counted as contamination as it is often producers that label items as recyclable.</p> | |
| Local Government | Contamination | <ul style="list-style-type: none"> • More transparency required in waste audit procedures. • Feedback on contamination types identified in waste audits within streams. | |

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| | | <ul style="list-style-type: none"> Better flow of information to allow collectors to act quickly and identify specific areas/buildings for education/enforcement. | |
| Local Government | Streetscape | <p>The Recycling Regulation requires producers to develop a plan to collect packaging and printed paper from residential premises and municipal property that is not industrial, commercial or institutional property; however, Recycle BC has not addressed collection on municipal property and streetscapes to date. The proposed approach for streetscape recyclables collection is a deviation from the current Recycle BC Program Plan in several aspects, and the proposed incentives do not reflect the cost of collecting packaging and printed paper from streetscapes. In addition, the City prefers to see participation in the Recycle BC streetscape collection service as optional. This would provide the City with an adequate timeline to implement streetscape packaging and printed paper collection along with other regional initiatives towards source separation and increased diversion.</p> | |
| Local Government | Streetscape | <ul style="list-style-type: none"> Incentive offered to carry out recycling is not sufficient to encourage Municipal sign on. Container requirements are onerous and purchase should be supported in full or part by Recycle BC. Yearly audits to be funded by Recycle BC. Reporting is too onerous based on financial incentives proposed. | |
| Anonymous | Streetscape | <p>The Recycling Regulation mandated the collection of PPP from residential premises and streetscapes. In its Stewardship Plan, Recycle BC included a qualifying statement related to streetscape collection where they will develop a preferred approach to streetscape collection services which included carrying out pilot projects with stakeholders. To date, Recycle BC has not addressed its obligations on municipal property/streetscape.</p> <p>Concerns:</p> <ul style="list-style-type: none"> Packaging Stewardship Plan: The proposed approach for streetscape is a deviation from the Recycle BC stewardship plan, as the new proposal seeks to offload processing and marketing requirements to collectors rather than using existing post-collection services. | <p>Recycle BC conducted four pilot projects including a nine-month pilot in the City of Vancouver. More information and reports can be found here: https://recyclebc.ca/education/on-street-recycling/</p> |

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| | | <ul style="list-style-type: none"> • Streetscape Offer: Recycle BC’s proposed offer is significantly lower than the costs to provide streetscape collection? If no local government agrees to accept the offer, will the Ministry view this as non-compliance? • Proposing that in order to participate in the streetscapes program, municipalities must have certain types of bins. <ul style="list-style-type: none"> • This will exclude a number of municipalities from participating in the program. • Recycle BC should work with local governments to determine an appropriate approach to developing a streetscapes program that is inclusive of all communities (this has not been the case at all) • Taking the current approach will still result in all costs for streetscape/public space recycling management on local governments. | |
| Local Government | Streetscape | <p>Streetscape collection would be an important tool for many communities, especially for communities that support tourism; inviting pedestrian traffic who generate streetscape waste.</p> <p>It would be important for Recycle BC to remain flexible in its approach to this program as not all communities are the same.</p> <p>Some communities are required to ensure that all collection bins use are designed to be Wildlife proof, which means that local Wildlife cannot gain access to waste material stored inside. Preventing the destruction of Wildlife by demanding that waste be stored securely should be a Recycle BC directive for all programs.</p> <p>Recycle BC should also be flexible when it comes to configuring streetscape bin systems. As long as communities comply with cross contamination rules, they must be granted the flexibility to self-determine what waste stream should be collected at each streetscape location. Flexibly to comingle, segregate or not include a waste stream due to a lack of specific waste generated around that location.</p> <p>We look forward to seeing how Recycle BC intends to roll out this program in 2019.</p> <p>Thank you for the opportunity to provide feedback.</p> | |
| Local Government | Research and Development | <p>The proposed research and development program for additional flexible packaging contains elements that are of concern to the City. In particular, the City is concerned with the proposed use of this material as an alternative fuel source and the potential impacts to the regional air shed. The City questions the claimed environmental benefit</p> | |

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| | | of utilizing this material in lieu of coal combustion, considering the increase in pollutants and greenhouse gases. The City has worked on similar air quality concerns with its partners at the Fraser Valley Regional District, who would welcome the opportunity to provide additional information and discuss this matter further with Recycle BC. The City would like participation to be optional in order for municipalities to decide if the program aligns with their respective strategic priorities and community values. The City also encourages Recycle BC to continue to work with suppliers and manufacturers to develop and use packaging that has viable recycling end markets. | |
| | Marketing and Communications | <ul style="list-style-type: none"> • ReCollect: request that Recycle BC share materials lists with member municipalities • Recycle BC could do more to educate people about packaging and printed paper. In our community there is a lack of understanding among many about the difference between [question was cut off when exported] | We will look into the best mechanism to share its Waste Wizard material list |
| Regional District | Other | You advise that you plan to make formal offers to collectors by summer 2018 and expect answers as early as October 1, 2018. We are concerned that this creates extremely tight timelines for review and recommendations by our Environmental Services Committee and approval by the CRD Board. Would it be possible to provide this information earlier? | Recycle BC is aiming to provide the formal offers and final agreements to contracted collectors in June 2018, which will provide collectors with over three months to review, sign and return the agreements as applicable. Given the time required to properly review the feedback received at the consultation event, adjust the original proposals as applicable and develop the finalized agreement language, Recycle BC is not in a position to provide the final agreements at an earlier date. |
| Private collector | Other | With respect to feedback on the proposed changes and information presented at the consultation, Emterra would like to comment on the following: | |

| | | | |
|--|--|--|--|
| | | <ul style="list-style-type: none"> • We support the proposal for curbside collection fees to be structured based on the container type, not just the material stream. This is a more accurate reflection of operational costs. • Education Top Up and Service Administration Top Up should be offered to organizations who subcontract with Recycle BC directly (not just municipal or First Nations subcontractors). These organizations are doing comparable levels of work but do not receive compensation for it. • We support the proposal for the establishment of thresholds for cross-contamination (both in multi-stream collections and segregated glass). Accordingly, we encourage Recycle BC to revise the definition of “Non-Targeted Material” to include cross-contaminated PPP. • We encourage Recycle BC to frame the conversation around “contamination” based on “Non-Targeted Material”, rather than “Non-PPP”, particularly when discussing operational performance (i.e. measuring collector performance, rate setting, key messages in education, etc.). Non-Targeted Material is a more accurate and real reflection of operational environments (e.g. for all collectors and processors, contaminated PPP is contamination). | |
| | | | |



RECYCLEBC™

230-171 Esplanade West, North Vancouver, BC



Engineering Department

2017 December 13

FILE: 36600 01

Mr. Allen Langdon,
Managing Director
Recycle BC
230-171 Esplanade West
North Vancouver BC V7M 3J9

Dear Mr. Langdon:

SUBJECT: PROPOSED CHANGES TO COLLECTOR MASTER SERVICES AGREEMENT AND STATEMENT OF WORK FOR PPP

The City has reviewed the proposed changes to the Collector Master Services Agreement and Statement of Work for PPP as presented at the Recycle BC Workshop on 2017 November 15-16, and would provide the following comments:

1. Curbside and Multi-Family Collection

- Introduce threshold for cross-contamination in multi-stream programs (e.g. plastic containers in paper/cardboard stream. Threshold rate to be defined.

Comment: It is recognized that the paper/cardboard markets are becoming increasingly stringent. However, in absence of data related to cross-contamination it is difficult to determine the significance of this issue and related threshold rate. In addition, if this is to be required, appropriate remuneration must be provided to the collector for this new requirement.

- Require collection drivers to assist in cleaning up bulk-head failures or high levels of cross contamination at receiving facilities of be charged for associated costs.

Comment: It is acknowledged that bulkhead failures may arise due to driver error, mechanical damage or equipment design and/or shortfalls in equipment performance. However, the requirement for collection drivers to assist in cleaning must only arise if it a driver error. Due notice and correction timelines must be provided for other factors.

- Introduce thresholds and penalties for cross-contamination in segregated glass (e.g. plastic containers in segregated glass stream). Threshold and penalty rate to be defined.

Comment: In absence of data related to cross-contamination it is difficult to determine the significance of this issue and related threshold rate and or penalties. In addition, if this is to be required, appropriate remuneration must be provided to the collector for this new requirement.

- Include glass deposit containers in calculation of total comingled glass rate when calculating associated 3% contamination by weight threshold.

Comment: It is understood that Recycle BC's goal is to direct all Category 8 glass collection (only glass containers included in Recycle BC program, excluding deposit glass) to depot or segregated glass collection. If this is to be required, appropriate remuneration must be provided to the collector for this new requirement.

- Require Recycle BC approval of policy on tagging contaminated material at the curb and tracking of associated metrics.

Comment: The City is not supportive and does not see a value of adding this requirement in the MSA and SOW. The City has already been using "oops stickers" when contaminated materials are noted in blue box. In addition, letters are being sent to residents informing them of the contamination.

- Require advance approval by Recycle BC of voluntary consolidation of material by collector at a site other than the designated receiving facility and make all associated changes to all applicable Recycling BC requirements.

Comment: No comment.

- Introduce required timeline of 18 months (beginning at start of the new agreements) for transition from single-use bags (clear blue bags) to re-usable containers provided to residents by the collector.

Comment: The City is not supportive of including this in the City's MSA and SOW as it does not apply to us. The City already requires the use of blue box and re-usable bags for collection of PPP.

- Require advance approval by Recycle BC of a detailed transition plan in order to change recycling container type. Approval will not be reasonably withheld upon receipt of the plan.

Comment: The City is not supportive of including this in the City's MSA and SOW. The City requires the use of blue box and re-usable bags for collection of PPP and does not see the benefits of moving from multi-stream to single stream.

- Require inclusion of Recycle BC logo on additional collection containers or replacements moving forward. Recycle BC will reserve the right to approve hot-stamps or other design features of collection containers.

Comment: The City is not supportive of including this in the City's MSA and SOW.

- Recycle BC will exercise its right to develop a methodology to net out non-packaging and printed paper and comingled glass from calculation of capture rate when calculating applicable bonus payments.

Comment: No comment.

- Replace Customer Service Reporting requirements with reporting of key customer service metrics (e.g. missed collection complaints per month).

Comment: No comment.

- Recycle BC can exercise its right to require advance approval of significant promotion and education materials, including annual recycling guide/calendar, regardless of whether it includes the Recycle BC logo.

Comment: The City is not supportive of including this in the City's MSA and SOW. It is understood that Recycle BC's primary concern is to ensure accuracy and consistency of information. To address this, Recycle BC can instead review the City's existing education and outreach material and recommend changes for City's consideration.

- Explicitly require that residents Education Top Ups (or equivalent amounts) be used for associated promotion and education activities. Recycle BC will reserve the right to request proof that equivalent funding (or more) has been spent on this purpose.

Comment: The City does not have any objection on this requirement. However, Recycle BC's right to request proof that the funding has been spent on this purpose is must be limited to the amount allocated only.

- Provide Recycle BC with the right to develop methodology to reduce the applicable incentive rates associated with those buildings where cardboard is collected as a separate stream and managed outside the Recycle BC Program

Comment: All collected cardboard from multi-family residence serviced by the City is collected separately and provided to Recycle BC. As such, this requirement should not be included in the City's MSA and SOW.

- Proposed Curbside and Multi-Family Payment Structure and Rates (2019-2023)

Comment:

The proposed increase in fees is insufficient. It does not even cover the annual inflationary cost from 2013-2018 or the actual collection cost. It is noted that the Consumer Price Index (CPI) 2014 to 2018 change is projected to be 9.9%. In addition, it is noted that this is a onetime increase over a 5 year contract term starting 2019. It is proposed that the fees reflect the annual cost of living to 2018 and that the fee subsequently be increased annually to cover the cost of living for the term of the contract.

2. Depot Collection

- Introduce threshold for cross-contamination between material categories (e.g. containers in paper/cardboard stream. Threshold rate to be defined;

Comment: It is recognized that the paper/cardboard markets are becoming increasingly stringent. However, in absence of data related to cross-contamination it is difficult to determine the significance of this issue and related threshold rate. In addition, if this is to be required, appropriate remuneration must be provided to the collector for this new requirement.

- Introduce thresholds and penalties for cross-contamination in segregated glass (e.g. plastic containers in segregated glass stream). Threshold and penalty rate to be defined.

Comment: In absence of data related to cross-contamination it is difficult to determine the significance of this issue and related threshold rate and or penalties. In addition, if this is to be required, appropriate remuneration must be provided to the collector for this new requirement.

- Include glass deposit containers in calculation of total comingled glass rate when calculating associated 3% contamination by weight threshold.

Comment: It is understood that Recycle BC's goal is to direct all Category 8 glass collection (only glass containers included in Recycle BC program, excluding deposit glass) to depot or segregated glass collection. If this is to be required, appropriate remuneration must be provided to the collector for this new requirement.

- Reduce the Comprehensive General Liability coverage limit from \$5 million to \$2 million.

Comment: No comment.

- Provide Recycle BC with the right to require collected material be stored in such a way that material quality is not impacted by inclement weather, such as rain and snow.

Comment: The City is not supportive of including this in the City's MSA and SOW. The proposed language is broad and does not provide mechanism for dispute resolution. In addition, if this is required, appropriate remuneration must be provided to the collector for this new requirement.

- Provide further clarification on responsibilities of depot staff requiring that they check the containers into which residents place packaging and printed paper regularly throughout operating hours, remove improperly stored material and communicate as required with customers.

Comment: The City is not supportive of including this in the City's MSA and SOW. The City, however, recognizes the importance of this issue and takes appropriate measures when required.

- Replace Customer Service Reporting requirements with reporting of key customer service metrics.

Comment: No comment.

- Provide Recycle BC with the right to require advance approval of major promotion and education material, including depot signs, regardless of whether it includes the Recycle BC logo.

Comment: The City is not supportive of including this in the City's MSA and SOW. It is understood that Recycle BC's primary concern is to ensure accuracy and consistency of information. Recycle BC can instead review the City's existing education material and depot signage, and recommend changes for City's consideration.

- Explicitly require that residents Education Top Ups (or equivalent amounts) be used for associated promotion and education activities and allow Recycle BC the right to request proof that equivalent funding (or more) has been spent on this purpose.

Comment: The City does not have any objection on this requirement. However, Recycle BC's right to request proof that the funding has been spent on this purpose is must be limited to the amount allocated only.

- Proposed Depot Incentives

For Group 3 - Local governments and First Nations depots, Recycle BC is proposing to eliminate incentives for the collection of paper, cardboard and containers. Recycle BC does not wish to support the duplication of the service in a way that directly or indirectly encourages residents to use a less convenient and unnecessary option to recycle their paper and containers.

Comment: The City objects to the proposed elimination of incentive rates for paper, cardboard, and containers to Group 3 – Local government and First Nation. Recycle BC is abdicating its mandate in collecting residential PPP materials. It has no basis for establishing these requirements other than to signal that they would like to see local governments and First Nations get out of PPP collection at their depots.

At the workshop, attendees heard Recycle BC speaker state that this change is being proposed as residents, on a weekly basis, are dropping PPP related materials at depots rather than using the curbside service. In doing so, the residents are also increasing the GHG footprint. There is "double dipping" on incentives being paid to the collector. The local governments are also in better position to tell residents to divert PPP materials at curbside and not bring them to the depot. Private depots contracted by Recycle BC are not in position to do so. When challenged to provide data to support these claims at the Workshop, there was no response.

3. Streetscape Collection

- Recycle BC is proposing a financial incentive of \$400/tonne subject to meeting Recycle BC's criteria. This incentive is fully inclusive of all required activities by the local government.

Comment: The proposed incentive of \$400/tonne is insufficient as it does not include the total cost of providing streetscape collection for PPP.

In addition to the above comments, the City wishes to have further discussion with Recycle BC on matters relating to contamination threshold of 3% and related penalties, split weighing loads, audits, and provisions for not collecting PPP in inclement weather conditions.

Yours truly,



Dipak Dattani
Deputy Director Engineering

DD/ac



Allen Langdon
Managing Director
Recycle BC
230-171 Esplanade West
North Vancouver, BC V7M 3J9

December 13, 2017

File No: 5380-01
Engineering Department

Dear Mr. Langdon:

Re: Recycle BC Consultation – City of Chilliwack Feedback

The City of Chilliwack has reviewed the changes proposed by Recycle BC and has concerns with a number of the proposed changes, as summarized below:

| Topic | Comments |
|---|---|
| Curbside Collection Financial Incentives | <ul style="list-style-type: none">• The financial incentives do not cover the cost of providing recycling collection services.• The administration top up for curbside collection should not be reduced from \$2.50/household, and should be the same regardless of whether collection services are carried out in-house or by a contractor. Providing a lower amount of compensation to communities with contracted collection service does not reflect the fact that contractors' administration costs are ultimately passed on to local government through the contract fees.• The depot top up for curbside collection should be available regardless of whether the local government provides depot services through an agreement with Recycle BC. Regardless of what organization operates the depots, there are depot-related education and promotion costs borne by the local government.• The financial incentives should include an annual inflationary increase.• Many of the proposed changes regarding the curbside collection program are overly prescriptive (e.g. requiring Recycle BC approval of a policy on tagging non-compliant materials, requiring approval of a detailed transition plan in order to change container types, requiring approval of significant promotion and education material regardless of whether it includes the Recycle BC logo, etc.). This level of control creates unnecessary bureaucracy and cost. |

| | |
|----------------------------------|--|
| Single-Use Bags | <ul style="list-style-type: none"> • The use of single-use bags for curbside recyclables should be discouraged but not prohibited. Many residents prefer to use blue bags (e.g. easier in windy conditions) and prohibiting their use may discourage participation in the program. |
| Other Flexible Plastic Packaging | <ul style="list-style-type: none"> • 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. • Recycle BC should ensure no net increase in air emissions related to alternative fuel. The City of Chilliwack is very concerned about air quality in the sensitive, confined, Lower Fraser Valley Airshed. • Given the processing challenges posed by certain types of packaging, Recycle BC and the Ministry of Environment should place more effort on trying to limit the use of unrecyclable packaging materials, either through disincentives or regulatory measures. For example, Recycle BC could charge producers a higher levy if they select packaging that is unrecyclable or is very difficult to recycle. |
| Recycling Depots | <ul style="list-style-type: none"> • A standard should be established to ensure residents from all communities have fair and equitable access to Recycle BC supported depots. There are only two Recycle BC depots in Chilliwack and the City has been bearing the expense of operating two additional depots to handle the local demand. Our depot operating costs increased from \$200,000/year to \$340,000/year due to the Recycle BC program because we had to expand the depots to include foam packaging and separated glass and film plastic. • Depot financial incentives should be consistent regardless of whether the depots are owned/operated by local government or the private sector. It is not reasonable to eliminate compensation for fibres and plastic containers at government depots. Even residents with curbside recycling service require depots from time to time (e.g. Christmas holidays, moving, etc.) and many residents in multi-family dwellings do not receive collection through Recycle BC. The depots would not be economically viable without compensation for fibres and plastic containers. |

If you have any questions regarding the City of Chilliwack’s feedback, please contact the undersigned at 604.793.2701 or tfriesen@chilliwack.com.

Sincerely,



Tara Friesen, P.Eng.
 Manager of Environmental Services



Making a difference...together

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December 15, 2017

File: 0220-20
General Correspondence

Allen Langdon
Managing Director, Recycle BC
220 – 171 Esplanade West
North Vancouver, BC
V7M 3J9

Dear Mr. Langdon:

RE: 2017 RECYCLE BC CONSULTATION

Thank you for the opportunity for consultation on Recycle BC's residential packaging and printed paper (PPP) recycling program. The purpose of this letter is to present CRD staff feedback on various aspects of proposed changes to your program.

CURBSIDE COLLECTION

Proposed Payment Structure and Rates

Under your proposed rate structure, the Capital Regional District's (CRD) financial incentive would increase from \$37.00 to \$40.65 per household (HH) a year. We are pleased to see an increase in the incentive rate; however, the rate will be fixed for the next five years. This does not reflect rising costs associated with collection services. We ask that you index the rate annually, based on the Consumer Price Index.

Proposed Reduction in Service Administration Top-Up Rate

You are proposing to reduce the service administration top-up rate from \$2.50 to \$1.10 per HH a year as you are removing reporting requirements in the new collection agreements. However, at the same time you are adding new service requirements which will result in more administrative work for our staff. We believe that the current top-up rate should be maintained or increased.

Curbside Collection Performance Bonus

In the past three years, the weight of PPP collected in the CRD's blue box program has remained consistent at 150 kg of PPP per HH per year, despite a reduction in materials such as newspapers and an increase in the number of households. You are proposing to pay a performance bonus of \$1 per HH starting at 160 kg per HH. This appears unattainable. The CRD program is very successful with high participation. We propose that you adjust your performance bonus to reflect the universal reduction in capture rates of kilograms per household across the province due to lighter material weights.

DEPOT COLLECTION

Proposed Payment Structure and Rates

The proposed per tonne incentive rate increases for some materials and the new baling incentive are welcome but do not come close to covering the cost of collecting PPP at Gulf Island depots in our region. We understand that Recycle BC's original per tonne incentive was based on data from private and public depots in the province which are not comparable to the unique service model provided by non-profit recycling societies on the Gulf Islands. We ask that your plan adequately provide for paying the costs of collecting and managing PPP at those depots, as stipulated in the BC Recycling Regulation.

Proposed new Approach to Depots in Areas with Curbside Service

Your new approach to depots in areas with curbside service creates an uneven playing field between private and public depots. You are proposing to eliminate incentives for the collection of fibres and containers for local government and First Nations depots only, but plan to continue offering applicable incentives for the same materials if they are collected at private depots. The same approach should be used for all depots in areas with curbside service, regardless of type of ownership.

We understand that there may be some duplication of service at depots in areas with curbside service. The best indicator of whether a depot is worthwhile is the PPP tonnage received. The CRD's Hartland recycling depot is located in an area with curbside service and collects about 600 tonnes of PPP a year; thus indicating demand for the service. The CRD has surveyed users of the depot twice and found that 93% are residential. The Hartland depot provides a needed service for unusual situations like a household move, clearing an estate and the Christmas season to deal with large volumes of PPP that cannot practically be put at the curb due to time constraints and/or volumes and would exceed the usual truck capacity. We ask that you reconsider your approach to depot services in curbside collection areas based on the merit of the depot's contribution to increasing the PPP recovery rate.

TIMING OF NEW AGREEMENTS

You advise that you plan to make formal offers to collectors by summer 2018 and expect answers as early as October 1, 2018. We are concerned that this creates extremely tight timelines for review and recommendations by our Environmental Services Committee and approval by the CRD Board. Would it be possible to provide this information earlier?

CONCLUDING COMMENTS

We would like to commend Recycle BC on their current consultation process. The Pre-Read Workbook, Custom Information Package and Consultation Event in November 2017 were well planned, organized and executed. We believe it created a new standard of excellence for stewardship plan consultation in our province.

Thank you for considering our input.

Yours truly,


per/

Tom Watkins,
Manager, Policy & Planning,
Environmental Resource Management
Parks & Environmental Services

TW:ac

cc: Teresa Conner, PPP File Lead, Ministry of Environment (Teresa.Conner@gov.bc.ca)



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December 15, 2017

File No. 0230-20-MMBC

Jordan Best
RecycleBC
230 - 171 Esplanade West
NORTH VANCOUVER BC V7M 3J9

Dear Mr. Best:

Re: RecycleBC Feedback for Consultation

This letter is being written to provide feedback based on the recent RecycleBC consultation and the proposed changes to the program and also to provide general feedback from the Cowichan Valley Regional District (CVRD) on both depot and curbside collection.

Cowichan Valley Regional District Curbside Collection

Boundaries: The CVRD curbside program services 13,000 homes and approximately 6,500 homes are serviced outside the 60 km boundary that defines where RecycleBC is responsible for getting curbside material to the processor. The cost to the program is significant as the collection program is charged \$35 per tonne to have the curbside material transferred to the processor in Nanaimo. The CVRD would like to see RecycleBC use distance from home as the boundary line as the CVRD boundary is 9,000 square kilometres and the boundaries are not a fair representation of where the actual service takes place. Electoral Areas A, B, C, F and I all have homes outside the 60 km boundary.

Further, the CVRD requests that the 60 km boundary be lowered or scaled to reflect the reality of curbside collection. Many routes require the collection trucks to dump twice in one day and having a curbside truck travel 240 kms per day to service a route is a significant barrier in terms of time and expense to service a route. In a ten-hour day a curbside truck is travelling up to 4 hours just to dump loads. That would see up to 40% of the CVRD collection routes spent driving to and from the processing plant. The CVRD sees the 60 km boundary as an unusually high burden to place on a collection program and request that it be lowered or a scaled system could be introduced.

Given that the Regional District boundary is less than 60 km away from the processor, this adds \$56,000 per annum to transfer material to the processor and that RecycleBC share in that expense. This \$56 000 represents 13% of the per home rebate that is currently provided to the CVRD for curbside collection.

Proposed New Rebate: The proposed curbside collection rebate per home does not fully cover the operating expenses of the program. In fact, the CVRD still issues utility bills to all residents for recycling collection. The rebate dollars only cover the fuel and labour to run the program. The cost of maintenance and repairs of the three trucks is not covered by the program nor is any of the administrative costs to run the program. There are other expenses such as land, building space used to store and maintain the trucks, and staff that are not covered by the program. These issues could be assisted through fuel surcharges, maintenance allowances and infrastructure assistance.

Bings Creek Recycling Centre Administration: The recycling centre is used by all member municipalities and the CVRD's curbside collection programs as a transfer point to get curbside material to the processor in Nanaimo. Part of this process involves CVRD operations staff

collecting material for RecycleBC audits. There is significant amount of operations staff working to get the bags loaded and processed to RecycleBC standards. There is also the administrative efforts to receive the request for audits, record and process for the approximately 52 audits a year we collect in the recycling centre. Given that it is not feasible for any of the municipalities to haul the curbside recycling material to the processor in Nanaimo in garbage trucks, the CVRD would like to see additional funding for the operation and administration of the Bings Creek Recycling Centre.

Education and Outreach: The CVRD has continuously embarked on educational programs to ensure that residents are utilizing the curbside recycling program. In order to run a comprehensive program the CVRD well exceeded the allotted education amounts in the current contract. Staff time, design and production of supporting materials is very costly when educating and enforcing the program requirements. The CVRD would request that the education amounts be increased in the new contract.

Depot Collection

Removal of Incentives for Depot Collection of PPP: The CVRD strongly discourages RecycleBC from removing the incentives for paper and containers from government run depots. RecycleBC stated that the impetus for changing incentives was to encourage the public to recycle paper and containers at the curb rather than at the depot. We fail to see how the reduction in incentives will change public behavior. If depots stopped accepting this material, citizens would be paying the same amount of taxes and see a direct reduction in their service. Rather than encouraging a change in behavior, this would lead to public outcry and political backlash. There is clearly a need and desire for the public to have access to the depots as the tonnages collected at depots can attest.

At the CVRD, the recycling depot facilities are run on the principle that they are one-stop shops for accepting *all* recyclable items. The CVRD has been working on long-term behavioral change through education and outreach to encourage citizens to recycle *only* paper and containers at the curb to reduce contamination, but that all waste is accepted at the depots. It is unfeasible that CVRD stop accepting paper and containers acceptable under the RecycleBC program at its depots. The expense of the labour and capital requirements to ensure that the CVRD is meeting RecycleBC requirements for paper and containers is greatly assisted by the revenue attached to these waste streams. The depot revenue received will be reduced by \$30,000 and this will have to be made up through reductions in other services. The CVRD is interested in meeting the diversion targets set out by RecycleBC through behavioral change relating to public recycling with the ultimate goal to encourage citizens to recycle paper and containers at the curb, funding for communications and education and should be implemented rather than removing material incentives.

Education and Outreach: The CVRD sees the education and outreach funding from RecycleBC as insufficient for effecting long-term behavioral change relating to public recycling practices. The average resident of the CVRD does not understand the details of RecycleBC items and finds the difference about what's accepted at curbside and at depots, and not accepted at all very confusing. The CVRD recommends that RecycleBC have a standardized education and outreach plan for the program to help local government with their communications.

Communication and education is crucial to reducing recycling contamination. Within the CVRD, the contamination rates within PPP recycling are high and as a result staff at the CVRD work on paid staff time to sort and meet the needs of the RecycleBC program. Reducing the contamination rates within recycling, and encouraging public to recycle particular items at the curb while bringing others to depots requires sustained education and outreach to make an impact. Studies show that education in the form of personal contact and feedback is the most effective for reducing contaminations rates (i.e. face-to-face contact at depots and tagging of recycling at curbside) and

these programs are very costly. If CVRD is to meet the requirements of RecycleBC, funding for education and outreach must be sufficient.

General Notes

Education incentives should be based on automated vs manual pick-up trucks; it is not a secret that there is more contamination in blue recycling totes for areas where curbside pick-up service is provided by the automated trucks. CVRD is currently engaged in manual auditing of the blue totes and education. It is a long and tedious process that requires additional labour for auditing as well as the follow up education program.

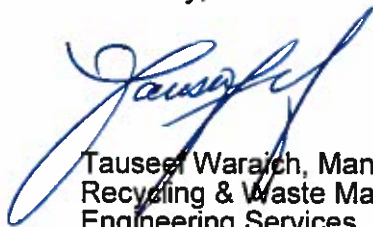
Contamination Bar (3%): Depending on the areas of service (rural vs urban, availability of curbside garbage service and other factors), RecycleBC should have a gradual goal of lowering the contamination, e.g. 10% or more should aim at 7% in 2 years and then 4% the following 2 years. Less than 3% will always be a challenge for automated curbside service. We understand the mounting pressure on RecycleBC, but we also need to recognize that human behavior will change slowly. RecycleBC branding and unified messaging for recycling by RecycleBC will help residents understand what is accepted in the blue bins and why.

Long-Term Plan: We understand that RecycleBC can only present 5-year plans but we assume RecycleBC will have a vision for 25 years. The Province has a Solid Waste Management Plan template for a 10-year plan with a vision of 25 years. RecycleBC is a significant partner (contracted service) for any regional district in BC, therefore, when a regional district is planning their infrastructure, diversion goals or even stating strategies to reach their goals, how are those valid if there is no guarantee that RecycleBC will change its direction every 5 years? In particular, what is the RecycleBC vision going forward for expanding recyclables from PPP to other items such as glass (we assume some jurisdictions have started this already).

Proposed changes discussed incentives for more tonnage received; we assume, apart from business requirements, this also helps in increased diversion. However, in the Regional District's Solid Waste Management Plan we are asked by the Province to look into reducing before considering recycling. Most regional districts now have their waste composition studies completed. Why not incentivize both reduction and recycling based on the region's yearly study?

In closing, the CVRD has enjoyed working with RecycleBC and appreciate the opportunity to provide feedback for the next contract. If you have any questions regarding our program please do not hesitate to contact me at 250.746.2530.

Sincerely,



Tauseef Waraich, Manager
Recycling & Waste Management Division
Engineering Services

:pl/dm

December 15, 2017

Mr. Allen Langdon, Managing Director
Recycle BC
230-171 Esplanade West
North Vancouver, BC V7M 3J9
VIA EMAIL: alangdon@recyclebc.ca

Dear: Mr. Langdon

RE Recycle BC Collector Consultation – City of Vancouver Submission

Thank you for inviting us to participate in the recent collector consultation conference. We appreciate the opportunity to provide comments on the material presented at the conference as well as the 2017 Consultation Pre-Read Workbook.

Our comments are as follows:

Recycle BC's Program Plan: We recommend the next version of the Program Plan include the following:

- A recovery target beyond 75% for specific materials or types of packaging and printed paper (PPP), particularly those that are present in the largest quantity and/or have the most persistence in the environment, to facilitate program planning and PPP design.
- Plans focussed on PPP redesign to facilitate reduction in use and overall volumes as well as designing for recovery rather than recycling only, as required in section 5(3) of the B.C. Recycling Regulation.
- Development of specific targets for gains through redesign, reduction and reuse initiatives.
- Sharing data at least annually on the amount and composition of PPP recovered in the host municipality.
- Specific initiatives to drive reduction, reuse and recycling of single-use items like plastic and paper bags, disposable cups and take-out containers, such as:
 - Collaborating with producers to expand EPR to these materials generated by the industrial, commercial and institutional (ICI) sector;
 - Education and behaviour change programs aimed at reduction and reuse;
 - Cup, container and bag exchange programs;

- Targets and key performance indicators to reinforce the reduction, reuse and recycling of these materials.

Streetscape:

- We believe the proposed approach, financial incentives and administrative requirements for municipalities don't support more efforts towards removing PPP materials from the public realm. In fact, we see it as a disincentive to further program development both logistically and financially. Specific areas of concern include:
 - The proposed eligibility requirements would result in significant administrative effort and cost to participating municipalities. Current program costs borne by the municipality would exceed the incentive offered, and administrative requirements including quarterly reporting and annual audits would be incremental.
 - Municipalities that collect small volumes of material 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.
 - The collection of PPP from municipal property that is not industrial, commercial or institutional property is an important part of the Recycling Regulation. In our view, participation in streetscape collection of PPP only in areas adjacent to residential property would be inconsistent with Regulation's requirements.
- We look forward to collaboration through the extension the City's streetscapes pilot project with Recycle BC, which we hope will inform a more favorable program proposal. This would include a better assessment of program costs, methods of reducing contamination, container styles, funding mechanisms and potentially alternate approaches for dealing with some materials.

Recycle BC Depots:

- Universality/Level Playing Field: The proposed plans to reduce funding to government depots compared to private depots causes us concern. We believe that Recycle BC should establish criteria for depots that ensure a level playing field, and fund any depot that meets the criteria. Preferential financial incentives for private depots are counter to the Stewardship Agencies of BC Action Plan to Enhance Extended Producer Responsibility in BC.
- The position that material collected through depots in areas served by curbside collection for single and multi-family dwellings is 'double-paying' for the same service is of significant concern to us.
 - All depots are currently paid only for materials collected (\$ per tonne), and they are only paid for materials which the resident has deemed more convenient to bring to the depot.
 - Data provided by Recycle BC shows that fiber and containers collected at depots have lower contamination rates and lower collection costs compared to curbside collection, both of which are pillars of Recycle BC's program.
 - Depots accepting all Recycle BC products, including fiber and containers, offer a ready and effective location that residents can bring Recycle BC products to, in the event that curbside service is interrupted, such as the severe winter conditions of 2016/2017.

Plastic Laminates:


- The proposal by Recycle BC to pilot the collection of multi-laminates or other flexible plastic packaging at depots is a step forward for the management of a previously neglected segment of the packaging waste stream. While development of an engineered fuel from this product is an interesting opportunity and step forward, this should not be done in isolation of working with producers to develop a more reusable or recyclable material.
- The 2017 producer fee set for companies choosing to use plastic laminate packaging instead of a reusable or recyclable material is not representative of the difficulty in managing the product. The fee is only marginally higher than that of plastic film or PET, for which end markets exist, materials are accepted and management costs exist (Laminates: \$1,020, Plastic Film: \$910, PET Containers: \$530 per tonne sold into market). We feel that program pricing should be set to encourage producers to move away from generating packaging which has "no commercial technology available to recycle at scale".

Recovery Rate

- Metro Vancouver commissioned a waste composition monitoring program in 2016, completed by Tetra Tech EBA Inc. from June to September 2016. Results from this study indicate significant volumes of Recycle BC materials within the waste, compost and streetscape streams. Analysis of the single family and multi-family garbage streams alone, suggest 30kg per capita of residential PPP could be thrown out by residents each year, instead of being cleaned and correctly placed into the curbside recycling programs. We would recommend reviewing this information from Metro to determine what additional materials could be recovered through the Recycle BC program. If for example Recycle BC is recovering 40.7kg per capita of residential PPP and 30kg per capita remains in the waste, the recovery rate could be as low as 57%, rather than the reported recovery rate of 78%.

We look forward to participating in upcoming consultation events. Please do not hesitate to contact me for further discussion of any of these matters.

Sincerely,



FOR Albert Shamess
Director, Zero Waste and Resource Recovery
(T) 604.873.7300
(E) albert.shamess@vancouver.ca

cc: Teresa Conner, Senior Policy Advisor, Environmental Services Branch, Ministry of Environment
Leeanne Fraser, Senior Policy Advisor, Environmental Services Branch, Ministry of Environment
Paul Henderson, General Manager, Solid Waste Services, Metro Vancouver
Regional Engineers Solid Waste Sub-Committee members.

December 15, 2017

Allan Langdon, Managing Director
Recycle BC
230-171 Esplanade West
North Vancouver, BC V7M 3J9

Via Email: alangdon@recyclebc.ca

RE: Consultation RecycleBC Curbside and Depot Collection

Dear Mr Langdon,

Thank you for the opportunity to participate in the recent consultation conference. The Fraser Valley Regional District (FVRD) took the opportunity to provide comment on the material presented at the conference as well as the 2017 Consultation Pre-Read Workbook through the webcast. At this time we would like to submit further comments as outlined below on the RecycleBC program.

The FVRD is encouraged that RecycleBC wishes to increase the collection of new streams of materials through a new category, namely 'Other Flexible Plastic Packaging'. However, the FVRD has grave concerns over RecycleBC's proposal to market residual material as alternative fuel. Materials marketed and sold in the lower mainland as alternative fuels will negatively impact our sensitive airshed.

This is not the first time that the FVRD has shared these concerns with RecycleBC. In the 2012 consultation concerning the original draft Packaging and Printed Paper Product (PPP) Stewardship Plan by RecycleBC (then formerly Multi-Material BC), the FVRD strongly opposed the intention to divert any residual material directly to an incinerator or for it to be indirectly burned by marketing it as alternative fuel. The FVRD is a strong advocate for the health of our residents and as per our approved Solid Waste Management Plan, allowing for any municipal solid waste from our region to be used as alternative fuel would be in violation of our provincially approved plan and would deteriorate the quality of the air we breathe.

Using garbage as fuel will provide a clear disincentive for the producers to modify the design of their product. Moreover, it provides a disincentive for proper public outreach. The more residual material collected the more fuel available for profit, thus leading to the commodification of these materials. This is not a Zero Waste practice or paradigm.

As all of the PPP collected in the province makes its way down to Metro Vancouver for processing, more of the province's residual material may end up as alternative fuel available to Metro Vancouver markets. If all of this alternative fuel is burned in the confined airshed, FVRD residents will suffer the health impacts of the waste practices of the entire province.

This may be compounded by the new depot Statement of Work and incentive rates which will make the participation for depots mandatory after November 2018. It will mean that this type of PPP collected from all over the province will contribute negatively to our sensitive airshed. For this reason we advocate that participation is not made mandatory for depots and that it is kept voluntary.

The FVRD asks that RecycleBC share the health impact assessment and epidemiological studies that they have either conducted or referenced to come to their decision to use alternative fuel and provide rationale

for how it plans to mediate or compensate for our residents' impacted health. The FVRD will specifically highlight this requirement to the Ministry of Environment & Climate Change Strategy and Ministry of Health. The FVRD would be glad to provide these ministries with the research and information they require to understand the negative impacts of using garbage as alternative fuel and the inaccuracies of viewing it as a greener alternative than coal.

The FVRD also has the opportunity to consider the wider impacts of the RecycleBC program from both an urban and rural perspective. Our three largest and urban municipalities, namely the City of Abbotsford, City of Chilliwack and the District of Mission, are in their inaugural year of the RecycleBC Stewardship Program, while the more rural municipalities of the District of Hope, District of Kent, and Village of Harrison Hot Springs, as well as the FVRD electoral areas are not yet part of the RecycleBC program. The following points are raised due to experiences felt with the RecycleBC program in our region which the FVRD would like assurances that no further deterioration in services is felt.

- There has been some confusion among residents in electoral areas who self-haul and small waste haulers that use nearby municipal facilities under contract with RecycleBC. These groups have not been under the RecycleBC education banner and have not received information about requirements at these facilities. **How will RecycleBC, working in partnership with regional districts and municipalities, better address this issue and future changes to the program that must be communicated more broadly?**
- The FVRD understands the reasons stated for switching from blue bags to carts or reusable containers. However, the FVRD has concerns that it will create a reduction in overall recyclables being diverted due to space constraints with the use of carts or blue reusable containers. **What assurances can RecycleBC offer that this is not the case?**
- The diversion of separated glass and a reduction in curbside pick-up is also a concern for the FVRD. Further incentives and collection points are needed to increase the diversion of these materials. **Could RecycleBC consider dedicated glass collection points at convenient spaces whereby residents could easily drop off and divert separate glass containers?** This would provide easier alternatives than currently offered which can be easily dealt with.

Please do not hesitate to contact me to further discuss any of the above matters and we look forward to participating in any further consultation events.

Sincerely,

Jamie Benton
Environmental Services Coordinator
604 703 5021

cc: Teresa Conner, Senior Policy Advisor, Environmental Services Branch, Ministry of Environment & Climate Change Strategy
Mark Zacharias, Deputy Ministry, Ministry of Environment & Climate Change Strategy

DEC 13 2017

File: CR-24-03-EPR-12

Mr. Allen Langdon, Managing Director
Recycle BC
230-171 Esplanade West
North Vancouver, BC V7M 3J9
VIA EMAIL: alangdon@recyclebc.ca

Dear Mr. Langdon:

Re: Recycle BC Collector Consultation – Metro Vancouver Submission

Thank you for inviting us to participate in the recent collector consultation conference. Discussions at the conference were helpful. We appreciate the opportunity to provide comment on the material presented at the conference as well as the 2017 Consultation Pre-Read Workbook. Metro Vancouver would like to submit the comments below as feedback on the Recycle BC program. Member municipalities may also submit comments on behalf of their own communities.

Metro Vancouver staff comments will be submitted to the Metro Vancouver Zero Waste Committee for information at its next meeting. The Zero Waste Committee may give direction to provide additional comments.

Metro Vancouver staff comments:

- Streetscape:
 - Scope: The Recycling Regulation requires that producers develop a plan to collect packaging and printed paper from municipal property that is not industrial, commercial or institutional property. Recycle BC's position appears to be that it will only participate in streetscape collection of packaging and printed paper adjacent to residential areas. This is inconsistent with the Recycling Regulation requirements.
 - Costs: The Recycling Regulation makes the producer responsible for collecting and paying the costs of collecting and managing products. The incentive proposed by Recycle BC is well under the cost of collecting packaging and printed paper from public spaces, as well as administrative efforts related to reports and audits. Metro Vancouver is working with member municipalities to detail actual collection costs, but we expect those costs to be as much as an order of magnitude higher than the proposed incentive.
- Comments on Master Services Agreement and Statements of Work: Member municipalities may submit individual comments related to contamination, market clearing prices and bonus incentives, drive time requirements to post-collection service providers, Consumer Price

Index adjustments, audit protocols, indemnity, Freedom of Information and Protection of Privacy Act implications, and split weight requirements. These issues continue to be challenging for municipal's contracting with Recycle BC.

- **Universality/Level Playing Field:** Recycle BC's appears to be picking and choosing depot collectors to receive Recycle BC funding with its proposed plan to reduce funding to government depots compared to private depots. Recycle BC should establish criteria for depots that ensure a level playing field, and fund any depot that meets the criteria. If depots are not funded equitably, residents in some communities will be double paying for packaging and printed paper.

We look forward to participating in upcoming consultation events. Please do not hesitate to contact me for further discussion of any of these matters.

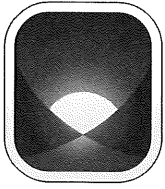
Yours truly,



Paul Henderson, P.Eng.
General Manager, Solid Waste Services

PH/AD/ah

cc: Teresa Conner, Senior Policy Advisor, Environmental Services Branch, Ministry of Environment
Leeanne Fraser, Senior Policy Advisor, Environmental Services Branch, Ministry of Environment
Regional Engineers Advisory Committee and Regional Engineers Solid Waste Sub-Committee members.



POWELL RIVER REGIONAL DISTRICT

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"Genetically Engineered Free Crop Area"

December 15, 2017

Allen Langdon
Managing Director
Recycle BC
230-171 Esplanade West
North Vancouver, BC V7M 3J9

Sent via email: alangdon@recyclebc.ca

SUBJECT: RECLASSIFICATION OF RECYCLING DEPOTS IN BC

Dear Mr. Langdon,

Members of the Powell River Regional District and the Let's Talk Trash Team attended the Recycle BC Consultation on November 15th and 16th, 2017.

We understand that moving forward, Recycle BC is proposing to reclassify recycling depots that have access to curbside and with that a change in the current incentives structure. In the *Custom Information Package* we received in preparation for the November consultation, it indicated that the Powell River Town Centre Depot was reclassified as Depot Group 3-Local Governments /First Nations with Curbside/Multi-Family. This would mean an elimination of the financial incentives for the "Paper, Cardboard and Container" streams. We understand that incentives for "Plastic Bag and Overwrap, Foam Packaging and Glass" will be increased however with this proposed change, the Powell River Regional District will stand to lose an estimated \$5000-\$6000 per year from past incentive agreements.

The Powell River Regional District currently operates five (5) depots at a cost of \$244,150 in 2016. The 2016 Incentives through Recycle BC were \$43,676, which only covers approximately 18% of operational costs.

The Powell River Regional District is concerned with any increase to an already costly program. We have multifamily residents that do not currently have access to curbside who rely on our Town Centre Depot for recycling as well as our ICI sector. Without the "Fibre and Container"

stream incentives it may not be financially possible for the PRRD to continue collecting ICI which we rolled out last year after a three (3) month audit with Recycle BC.

If the Town Centre Depot is reclassified as Category 3 and there is no longer the financial incentive to collect paper and containers, we feel there is a risk to being able to continue providing the service to our residents.

The Powell River Regional District provides our constituents with an accessible, convenient and educational recycling experience and at the same time collects an incredibly clean material stream for Recycle BC. This all comes at a cost that the Recycle BC incentive program does not come close to covering and in fact still has a net cost to the Powell River Regional District that far exceeds disposing of these materials to landfill.

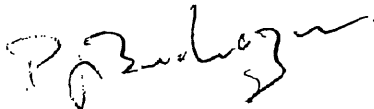
This new proposal from Recycle BC appears to download more costs to local government and tax payers and does not seem to be in line with what the Province set out to accomplish in 2011.

(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 B.C. taxpayers to producers, and to give producers more incentive to be environmentally friendly by producing less packaging and waste).

We strongly encourage you to reassess your financial plan and disincentives.

Sincerely yours,



Patrick Brabazon, Chair
Powell River Regional District

cc Honourable George Heyman
Minister of Environment and Climate Change Strategy

November 28, 2017

File No.: 5380.04
EPR Consultation

consultation@recyclebc.ca

Re: Consultation RecycleBC Curbside and Depot Services

Thank you for the opportunity for consultation on the proposed changes to RecycleBC collection and depot contracts. The Pre-Read Workbook, Custom Information Package and Consultation Event in November were well organized and clear. RecycleBC has done an excellent job of communicating their proposed changes and allowing for dialogue with local governments.

This letter outlines the concerns of the Regional District of Okanagan-Similkameen (RDOS) to proposed changes to the RecycleBC program. The RDOS was one of the first local governments in the Interior of BC to open recycling depots. The majority of our residents have been serviced by curbside recycling collection programs for more than a decade. Recycling is a motherhood issue for our citizens and elected officials.

Removal of Clear Plastic Bags as a Container

The RDOS, in partnership with the City of Penticton, District of Summerland, Town of Osoyoos and Town of Oliver, awarded a 7 year contract for collection to Waste Connections of Canada starting July 1st, 2018. This resulted from a RFP issued in the spring of 2017. As the RecycleBC consultation documents were received October 12th, 2017 any proposed changes could not be considered in the RFP process. To allow for the delivery of a new split truck collection fleet, the RDOS and participating member municipalities must sign this contract within several weeks. There is no room for extending these deadlines partially due to the persistent breakdowns of existing vehicles.

RDOS rural service areas and the Town of Osoyoos have opted to keep their present collection method of customer supplied containers. Residents will be able to use clear plastic bags, reusable manual containers and carts provided by the home owner. Penticton, Summerland and Oliver have opted for automated cart collection including RFID tag detectors, internal cameras and a reporting system for contamination in loads. The carts in these communities will be supplied through the local government; either directly or through Waste Connections.

RecycleBC is proposing to ban the use of single-use bags and requiring collectors to provide reusable containers for July 1st, 2020. RecycleBC has commented the main reason for this change is to remove non-recyclable film plastic received at Municipal Recycling Facilities. To paraphrase comments heard, allowing non-recyclable film plastic to enter the recycling stream is against the philosophy of RecycleBC. It was also mentioned that in some receiving locations the bags are opened by hand which can be a hazard for workers.

RecycleBC has stated they are not encouraging local governments to adopt mandatory cart collection. This is most likely due to the higher contamination rate found in cart collection services.

Looking around BC, the main alternative to plastic bags or cart collection is multi-stream collection using manually collected blue boxes. Multi-stream collection is not a possibility for the RDOS at this point. The fleet of vehicles being ordered by Waste Connections will be split trucks that will collect refuse every week. Yard waste will also be collected on alternate weeks in many communities. This set up only allows for single stream collection. The business case for multi-stream collection has been explored but with long rural routes, often along major highways, sending a second truck was deemed too costly and inefficient.

Judging by the incentives offered and comments on automated cart collection, RecycleBC envisions a single stream blue box collection method where the collector can manually remove contaminants at the curb. Due to weight and volume concerns of bi-weekly collection this would mean supplying at least two large coloured boxes to each home. The RDOS is unaware of any jurisdiction in BC that presently collects single stream recyclables using a method for multi-stream collection.

A key concern for the RDOS is the use of blue boxes along major highways, rural areas and areas of high winds. The RDOS services Highway 97, Highway 3 and Highway 3A. These major highways result in issues with blue box collection including wind from passing vehicles and snow removal affecting both the blue boxes and materials left inside. Rural areas lack curbs, have long driveways and have more birds and animals that can get into and spread non-contained recycling. Wind, especially in the narrow Similkameen valley, can be severe. Wind blown litter along these corridors has the potential to increase. Several areas primarily use clear bags, often with a rock on top, as empty reusable containers can be blown away into traffic.

The RDOS has evaluated a variety of collection methods and for rural areas single stream, split-truck collection is the most efficient. RecycleBC has shown that where multi-stream collection is not possible, single use bags create less contamination than cart collection. Allowing for the continuation of blue bag collection would reduce contamination rather than requiring the RDOS to provide cart service. The other option is for the RDOS to remove service and require RecycleBC to directly contract recycling collection in these rural areas.

The RDOS has been lead to believe that, even discounting additional contamination, that single stream collection recovers more materials per home than multi-stream collection. If this is true then single stream blue bag collection recycles more materials while reducing contamination versus cart collection.

The Green By Nature MRF in Kelowna has successfully received blue bags recyclables for decades. Unlike other smaller receiving depots that open the bags by hand, our understanding is this MRF is equipped to mechanically remove the plastic bags. If this is the case then continuation of blue bag collection will not create undue hazards for workers.

- The RDOS requests a meeting with local Green By Nature representatives to better understand the inherent contamination and worker safety concerns caused by blue bag collection. We would like to understand if these concerns can be mitigated.
- We request that RecycleBC not require the removal of blue bags as a collection option. Our contract with Waste Connections expires in June 2025. The RDOS can explore other collection options in early 2024 for implementation in 2025.
- The implementation of a blue box program in rural areas along highways is not deemed as practical by RDOS Staff. Banning blue bags in 2020 will require the RDOS to implement cart collection or require that RecycleBC contract directly for curbside collection in our service areas.

Removal of Tonnage Incentives for Type 3 Depots

RecycleBC has proposed new definitions for depots. Type 1 would be in an area where a significant proportion of residents (undefined at this time) do not receive curbside collection. Type 2 would be private depot in any community. Type 3 would include any Local Government depot operated in an area where almost all homes receive direct curbside collection.

A concern for the RDOS is these definitions are undefined. The Princeton Landfill has a large segment of population outside the Town of Princeton not serviced by curbside collection. It would appear that this landfill will be a Type 1 depot? Other facilities service Indian Bands without RecycleBC curbside collection that make up a small proportion of the local population. Will local governments need to provide StatsCan data regarding pockets of non-collection to determine if depots are Type 1 or 3?

RecycleBC has proposed that Type 3 depots will not be paid a tonnage incentive for materials collected. RecycleBC will still provide a 25 cent curbside Depot Top Up incentive per home and collect materials for free from depots. Depots would be required to continue all requirements including manned operation, fences and signage.

Depots can also opt out of RecycleBC collection and market their own recyclables. Judging by present prices and future demands on the quality of recyclables this is not realistic. RecycleBC has stated there will be no opt back in if markets continue to get worse.

The reasoning for the removal of tonnage incentives is puzzling. RecycleBC will continue to subsidize depot operations with a flat 25 cent per home curbside payment but wants to discourage local government depots? Private depots will be incentivised where curbside is available but not local government operations providing the same service at similar costs (actually higher as our Staff are unionized)? It is recognized that a certain percentage of residents may use depots but no allowances in Type 3 depots based on size of population served? RecycleBC wants to disincentivise Type 3 depots but recognizes the materials are PPP and will maintain all collection costs by Green By Nature?

RecycleBC already has contract provisions that require local governments to either divert or account for ICI materials. If this is the true concern of Type 3 depots, as it is not mentioned in the consultation documents, then it can be addressed through existing powers in the contract.

The best judge of whether a depot is worthwhile is the tonnage of materials received. The per tonnage incentive is an elegant way for determining if a depot is cost effective or required. The Campbell Mountain Landfill is one of two depots for over 50,000 people. RecycleBC should encourage well sited and operated depots that service a significant population regardless of whether they are private or local government. Local governments also provide depots in communities where there are no private depots. For these communities the depot is recognized as a necessary service as there are times when homeowners reasonably opt to use a depot rather than wait for curbside collection.

Local Governments have also invested in capital improvements based on continuation of per tonne incentives. RecycleBC introduced the collection of mega-bags which required new structures. The RDOS has purchased modified shipping containers to allow for safe drop off and storage of mega-bag materials. This includes paper and containers at smaller facilities with limited volumes. Even where these structures are only used for film, glass and polystyrene, the incentives from paper and containers are used to help pay for the additional costs where available. Removing incentives by weight will significantly reduce the ability to pay back the capital costs of these structures or install more structures where needed to protect materials from wind and rain.

- The RDOS believes the per tonne incentives are a fair way to fund local depots for both private sector and public depots. Paying depots that collect RecycleBC materials by weight forces Local Governments to fairly evaluate the need for depots which receive low volumes. Removing incentives unnecessarily targets public sector depots and removes the ability of public sector depots to finance capital improvements.
- The RDOS would be willing to reallocate the 25 cent curbside Depot Top Up to increase the Residential Education Top Up. This would level the playing field for private and local government depots. Local governments are already advertising private depots. This additional revenue towards the Education Top Up would further RecycleBC education goals.

Other Issues

- The Residential Education Top-Up is proposed to stay at 75 cents per home per year while the Service Administration Top-Up is being dropped by 65 cents. The RDOS recommends that the 65 cents from Administration reduction be fully invested into the Education Top Up to raise it to \$1.40 per home. Both Canada Post and traditional advertising have significantly raised rates. Freezing the Education Top-Up limits the ability for local governments to reduce contamination, advise residents on what materials can be recycled and communicate on the program in general.

The RDOS supports RecycleBC requirement that the Residential Education Top Up be used solely for promotion and education. One mailout costs more than 75 cents. More money directed at education will benefit RecycleBC.

- Where Green By Nature accepts the use of front end or roll off containers, RDOS Staff may not be permitted to enter the containers to remove contaminants due to enclosed space safety requirements. As such RecycleBC should provide safety allowances in all service contracts where it requests depot Staff remove all visible contaminants as indicated in the Pre-Read Workbook.
- Glass megabags should be segregated and identified. Glass shards are a hazard when embedded in closed mega-bags. Opening the mega-bags can release a cloud of glass at workers. Identifying and re-using the same mega-bags for glass would make it easier for our Staff to undertake safe work procedures.
- The present curbside bonus payment is based on the weight of materials collected per household. The RDOS can show that collection rates are based on average population age not the quality of collection methods. Both the weight of garbage and recycling decreases as population age increase. This is most likely due to the reduction of children living within the household and more frugal people on fixed retirement incomes. The south Okanagan and Similkameen are some of the oldest per capita populations in BC.

The RDOS asks that RecycleBC consider any bonus payments based on criteria applicable to communities with higher than average population age.



City of Richmond

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www.richmond.ca

December 13, 2017
File: 10-6370-01/2017-Vol 01

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Fax: 604-233-3336

Via Email: alangdon@multimaterialbc.ca

Recycle BC
Via email
230 - 171 Esplanade West
North Vancouver, BC V7M 3J9

Attention: Allen Langdon, Managing Director

Dear Mr. Langdon:

Re: Recycle BC Consultation Feedback

This letter is in response to the 2017 Recycle BC consultation workshop where proposed changes to the Master Services Agreement and various statements of work were discussed. Thank you for the opportunity to provide feedback on the proposed changes.

The attached document presents the proposed changes and Richmond's response/comments on each, as well as highlights other issues and comments on the proposed incentive rates.

I would be pleased to discuss these comments with you. Please feel free to contact me at 604-233-3338 or via email at sbycraft@richmond.ca.

Yours truly,

Suzanne Bycraft
Manager, Fleet and Environmental Programs

SJB:la

City of Richmond – Recycle BC Fall 2017 Consultation Feedback

Overview of Proposed Changes

| Type of Collection | Proposed Change | Richmond Response |
|---|---|---|
| <ul style="list-style-type: none"> • Curbside • Multi-family | Introduce defined thresholds for cross-contamination in multi-stream programs (e.g. containers in paper/cardboard stream). | <ul style="list-style-type: none"> • Overly prescriptive. • Leaves collectors open to arbitrary determinations. • How would this be substantiated and measured? • How would a collector be able to challenge the findings if they didn't agree? • Incent collectors instead with a bonus payment for no cross contamination. |
| <ul style="list-style-type: none"> • Depot | Introduce defined thresholds for cross-contamination between material categories (e.g. containers in paper/cardboard stream). | <ul style="list-style-type: none"> • Overly prescriptive. • Leaves collectors open to arbitrary determinations. • How would this be substantiated and measured? • How would a collector be able to challenge the findings if they didn't agree? • Incent collectors instead with a bonus payment for no cross contamination. |
| <ul style="list-style-type: none"> • Curbside • Multi-family • Depot | Introduce defined thresholds and associated service level failure credits for cross-contamination in segregated glass (e.g. plastic containers in the segregated glass stream). | <ul style="list-style-type: none"> • Overly prescriptive. • Leaves collectors open to arbitrary determinations. • How would this be substantiated and measured? • How would a collector be able to challenge the findings if they didn't agree? • Incent collectors instead with a bonus payment for no cross contamination. |
| <ul style="list-style-type: none"> • Curbside • Multi-family • Depot | Include glass deposit containers in calculation of total comingled glass rate when calculating associated 3% contamination threshold. | <ul style="list-style-type: none"> • Unnecessarily punitive. • Explaining the difference between deposit and non-deposit glass to residents is difficult. • All glass has traditionally been part of recycling programs. |
| <ul style="list-style-type: none"> • Curbside • Multi-family | Require collection drivers to assist in cleaning up bulk-head failures or high levels of cross contamination at receiving facility or be charged for associated cost. | <ul style="list-style-type: none"> • Provided this doesn't detract from being able to complete recycling collection routes and/or negatively impact service levels, this is acceptable. • Associated fee structure should be clearly defined in advance. |
| <ul style="list-style-type: none"> • Curbside • Multi-family | Require Recycle BC approval of policy on tagging contaminated material at the curb and multi-family buildings and tracking of associated metrics. | <ul style="list-style-type: none"> • Overly prescriptive. • Just hold collectors accountable to performance. |

City of Richmond – Recycle BC Fall 2017 Consultation Feedback

| Type of Collection | Proposed Change | Richmond Response |
|---|--|--|
| <ul style="list-style-type: none"> • Curbside • Multi-family | Require advance approval by Recycle BC of voluntary consolidation of material by collector at a site other than the designated receiving facility and make associated changes to all applicable Recycle BC requirements. | <ul style="list-style-type: none"> • Support consultation but not advance approval. This can be a cost issue for collectors so should be at their discretion unless MMBC will agree to pay for any and all cost impacts. • Master Services Agreement Section 2.1.5 c) should be revised. As opposed to “from the municipal boundary at the point of least distance to the facility . . .” Revise to “from the most central area within the municipal boundary.” • Also in 2.1.5 c), change reference to traffic conditions timing. Instead of from 10 a.m. – 2 p.m. to 2 p.m. – 5 p.m. to be more reflective of when loads are typically being delivered. |
| <ul style="list-style-type: none"> • Curbside • Multi-family | Introduce required timeline of 18 months (beginning at start of new agreements) for transition from single-use bags to reusable containers provided to residents by the collector. | <ul style="list-style-type: none"> • Understanding is that this language applies to single-use bags. If that is correct, then no impact to Richmond is foreseen. |
| <ul style="list-style-type: none"> • Curbside • Multi-family | Require advance approval by Recycle BC of a detailed transition plan in order to change recycling container type. Approval will not be reasonably withheld upon receipt of plan. | <ul style="list-style-type: none"> • Not supported as municipal collectors will need the flexibility to deliver the service in the manner which results in maximum cost recovery and/or control of financial impact to the municipality. • Notice and consultation only; not approval. |
| <ul style="list-style-type: none"> • Curbside | Require inclusion of Recycle BC logo on additional collection containers or replacements moving forward. Recycle BC will reserve the right to approve hot-stamps or other design features of collection containers. | <ul style="list-style-type: none"> • Collectors have paid for the containers, not MMBC. If MMBC wants their logo on the containers, then they should include a payment structure. |
| <ul style="list-style-type: none"> • Curbside • Multi-family | Recycle BC will exercise its right to develop a methodology to net out non-packaging and printed paper and commingled glass from calculation of capture rate when calculating applicable bonus payments. | <ul style="list-style-type: none"> • Acceptable. • The bonus threshold should be further reduced to compensate for the exclusion of printed paper and co-mingled glass AND in light of manufacturer trends to lower-weight packaging material. |
| <ul style="list-style-type: none"> • Curbside • Multi-family • Depot | Replace Customer Service Reporting requirements with reporting of key customer service metrics (e.g. missed collection complaints per month). | <ul style="list-style-type: none"> • Acceptable. |

City of Richmond – Recycle BC Fall 2017 Consultation Feedback

| Type of Collection | Proposed Change | Richmond Response |
|---|--|--|
| <ul style="list-style-type: none"> Curbside | Recycle BC can exercise its right to require advance approval of significant promotion and education materials, including annual recycling guide/calendar, regardless of whether it includes the Recycle BC logo. | <ul style="list-style-type: none"> Promote consultation as opposed to imposing advance approval. This requirement would add unnecessary delays and imposes unnecessary oversight on local governments. |
| <ul style="list-style-type: none"> Multi-family | Provide Recycle BC with the right to require advance approval of major promotion and education material, including annual recycling guide/calendar, regardless of whether it includes the Recycle BC logo. | <ul style="list-style-type: none"> Promote consultation as opposed to imposing advance approval. This requirement would add unnecessary delays and imposes unnecessary oversight on local governments. |
| <ul style="list-style-type: none"> Depot | Provide Recycle BC with the right to require advance approval of major promotion and education material, including depot signs, regardless of whether it includes the Recycle BC logo. | <ul style="list-style-type: none"> Promote consultation as opposed to imposing advance approval. This requirement would add unnecessary delays and imposes unnecessary oversight on local governments. |
| <ul style="list-style-type: none"> Curbside Multi-family Depot | Explicitly require that Resident Education Top Ups (or equivalent amounts) be used for associated promotion and education activities. Recycle BC will reserve the right to request proof that equivalent funding (or more) has been spent on this purpose. | <ul style="list-style-type: none"> Overly restrictive, particularly since local governments are motivated to serve/satisfy the public and activities become blended with other related services. This requirement will add more administration costs/time for tracking/justification purposes. |
| <ul style="list-style-type: none"> Multi-family | Provide Recycle BC with the right to develop a methodology to reduce the applicable incentive rates associated with those buildings where cardboard is collected as a separate stream and managed outside the Recycle BC program. | <ul style="list-style-type: none"> Overly punitive. Recycle BC would have to substantively increase the incentive rate to cover the costs of providing cardboard recycling containers. This is a service most multi-family developments pursue independently. |
| <ul style="list-style-type: none"> Depot | Reduce the Comprehensive General Liability coverage limit from \$5 million to \$2 million. | <ul style="list-style-type: none"> Acceptable. |
| <ul style="list-style-type: none"> Depot | Provide Recycle BC with the right to require collected material be stored in such a way that material quality is not impacted by inclement weather, such as rain and snow. | <ul style="list-style-type: none"> Providing roofs or covers can be very expensive, so this is not supported. Perhaps Recycle BC work with depot operators where there are issues instead to collectively address the problem. |
| <ul style="list-style-type: none"> Depot | Provide further clarification on responsibilities of depot staff requiring that they check the containers into which residents place packaging and printed paper regularly throughout operating hours, remove improperly sorted material and communicate as required with customers. | <ul style="list-style-type: none"> Overly prescriptive. Hold collectors to performance only and do not interfere with day to day operations. |

City of Richmond – Recycle BC Fall 2017 Consultation Feedback

Other Issues

| | Proposed Change | Richmond Response |
|---|---|---|
| <ul style="list-style-type: none"> Split Weighs | Requirement to weigh each load to get the weight of segregated glass. | <ul style="list-style-type: none"> To obtain glass weight, every compartment of every load must be weighed; requiring 3-4 scale passes for each truck (depending on which compartment glass is in). Use the split weigh percentages to calculate material weight and eliminate the need to weigh glass separately on all loads. |
| <ul style="list-style-type: none"> Contamination/Audit Protocols | MMBC requires audits on each material grade. | <ul style="list-style-type: none"> Send detailed audit results monthly or at a minimum, quarterly. |
| <ul style="list-style-type: none"> Streetscapes | \$400/tonne incentive fee | <ul style="list-style-type: none"> Fee is substantively below costs and requirement to separately weigh designated RecycleBC materials will add costs over and above current practices. Recommend an incentive amount per household or per capita. |

Incentive and Top-Up Rates

| Type of Collection | Proposed Change | Richmond Response |
|--|--|--|
| <ul style="list-style-type: none"> Curbside | Proposing to differentiate local government and First Nations curbside collectors into 3 groups: <ol style="list-style-type: none"> Single stream collectors using automated carts Single stream collectors using other container types Multi stream collectors | <ul style="list-style-type: none"> Acceptable. |
| <ul style="list-style-type: none"> Curbside Multi-Family | Remove reporting requirement for collected weights using online portal and lower service administration top-up. | <ul style="list-style-type: none"> Remove reporting but don't lower administration top-up since Recycle BC's incentive rates do not currently recover costs. |
| <ul style="list-style-type: none"> Curbside | Service administration top-up rate is adjusted based on who is performing collection: <ol style="list-style-type: none"> Collectors using "in-house" collection staff (\$1.75) Collectors using collection contractors (\$1.10) | <ul style="list-style-type: none"> There should be no decrease for in-house vs. contract collection. Either way, the service administration is a cost, i.e. it is either incurred internally or paid via the contract cost. |
| <ul style="list-style-type: none"> Multi-family | Service administration top-up rate is adjusted based on who is performing collection: <ol style="list-style-type: none"> Collectors using "in-house" collection staff (\$1.25) Collectors using collection contractors (\$0.75) | <ul style="list-style-type: none"> There should be no decrease for in-house vs. contract collection. Either way, the service administration is a cost, i.e. it is either incurred internally or paid via the contract cost. |
| <ul style="list-style-type: none"> Depot | Proposing to differentiate depots into 3 groups: | No impact to Richmond. |

City of Richmond – Recycle BC Fall 2017 Consultation Feedback

| Type of Collection | Proposed Change | Richmond Response |
|---|---|------------------------|
| | <ol style="list-style-type: none"> 1. No Curbside/Multi-family 2. Private with Curbside/Multi-family 3. LG/FN with Curbside/Multi-family | |
| <ul style="list-style-type: none"> • Depot | For Depots in Group 3, RecycleBC is proposing to eliminate incentives for the collection of paper, cardboard and containers. | No impact to Richmond. |

| Rate Type | Current Rate | Proposed Incentive Change | Response |
|--------------------------------|----------------|---------------------------|--|
| Curbside Incentive Rate | \$35.00 | \$38.45 | <ul style="list-style-type: none"> • Increase overall multi-stream collection incentive/total by 30%. • Single-stream rate promotes multi-stream programs switching to single-stream since that rate is more representative of full cost recovery. • Provide an annual inflationary increase, i.e. 2%-3% minimum. |
| Resident Education Top-Up | \$0.75 | \$0.75 | Prefer all in cost recovery vs. top ups. |
| Depot Top-up | \$0.25 | \$0.25 | Prefer all in cost recovery vs. top ups. |
| Service Admin Top-Up | \$2.50 | \$1.10 | Prefer all in cost recovery vs. top ups. |
| Total | \$38.50 | \$40.55 | |
| Multi-family Incentive Rate | \$20.00 | \$21.90 | <ul style="list-style-type: none"> • Increase overall multi-stream collection incentive/total by 30%. • Single-stream rate promotes switching to single-stream since that rate is more representative of full cost recovery. • Provide an annual inflationary increase, i.e. 2%-3% minimum. |
| Resident Education Top-Up | \$1.00 | \$1.00 | Prefer all in cost recovery vs. top ups. |
| Depot Top-up | \$0.25 | \$0.25 | Prefer all in cost recovery vs. top ups. |
| Service Admin Top-Up | \$2.50 | \$0.75 | Prefer all in cost recovery vs. top ups. |
| Total | \$23.75 | \$23.90 | |
| Depot – Plastic bags/overwrap | \$175/tonne | \$500/tonne* | <ul style="list-style-type: none"> • Acceptable |
| Depot – Foam packaging | \$175/tonne | \$600/tonne* | <ul style="list-style-type: none"> • Acceptable |
| Depot – Glass containers | \$80/tonne | \$90/tonne | <ul style="list-style-type: none"> • Acceptable |
| *Additional incentive if Baled | | \$330/tonne | |

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December 14, 2017

File:

Mr. Allen Langdon, Managing Director RecycleBC
230-171 Esplanade West
North Vancouver, BC V7M 3J9
VIA EMAIL: alangdon@recyclebc.ca

Dear Mr. Langdon:

RE: RecycleBC Collector Consultation – West Vancouver Submission

Thank you for inviting feedback on the next phase of Recycle BC's stewardship plan for Packing and Printed Paper (PPP). We appreciate the opportunity to provide comment on the 2017 Consultation Pre-Read Workbook, the West Vancouver Custom Information Package, and the material presented at the November 14-15th conference.

Our comments can be broken down into the following areas:

- Comments on the apparent inequity between single stream and multi-stream **"municipal collector compensation"** to municipal collectors;
- Comments on the proposed changes to **"payments for segregated cardboard"** collected from multi-family buildings; and
- Comments on the proposed **"streetscape recycling"** plan.

Municipal Collector Compensation

Throughout the conference it was apparent that there is an inequity between the compensation levels offered to single stream versus multi-stream methods of collection. It also became apparent that these two methods of collection result in distinctly different levels of contamination, with the cleaner products coming from multi-stream systems. Additionally, RecycleBC has presented information indicating that there is no apparent volume increase that is achieved in implementing a single stream system.

While we applaud RecycleBC for addressing the above with a compensation structure that favors multi-stream systems, we feel it does not go far enough. The levels of compensation offered to multi-stream municipal collectors simply does not meet the costs of providing this method of collection. And therefore, does not adequately reward the methods of collection that provide cleaner recyclable products.

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Potential solutions to this could take the form of:

- Enhancing the rate structure to provide multi-stream collection providers with additional compensation; and/or
- Provide an incentive bonus based on contamination levels in addition to the existing incentive bonus that merely favors volume.

This continued inequity outlined above provides further impetus for multi-stream municipal collectors to consider exiting the program and moving to the “direct service” model, or alternatively to investigate the apparently cheaper method of providing a system based on single stream collection.

Segregated Old Corrugated Cardboard (OCC) at Multi-Family Buildings

While we recognize that OCC is in scope PPP, it is not in scope for municipal collection and has never been. Historically OCC is collected by private haulers through individual contract with residential buildings. The multifamily SOW does not refer to OCC material collected by private hauler contract between the building and a third party collector.

Current incentive levels do not cover the cost of multi-stream collection in the municipal scope of service. Any reduction in the MF incentive related to OCC transfers collection costs back on to the resident who would now pay in 3 ways:

- at the till;
- for private OCC hauling; and
- in reduced municipal incentives which will affect costs for other fibers.

Rather than explore methodology expressly to reduce municipal incentive rates, potential solutions could include:

- Consideration of an additional incentive to encourage municipal collectors to adopt service; and or
- RecycleBC to work with private haulers of OCC to collect this tonnage and or value for OCC instead of tackling this challenge by punishing municipal collectors.

Streetscape Recycling (Public Realm Recycling)

Once again, we applaud the efforts being made by RecycleBC in this area, however we feel there is substantial additional work needed to develop an effective plan for this area. We hope that these comments will help foster an ongoing partnership with local government around this most difficult recycling challenge.

The BC Recycling Regulation states that “...with respect to the packaging and printed paper category, the plan adequately provides for the collection of the product by the producer (i) from residential premises, and (ii) from municipal property that is not industrial, commercial or institutional property.”

Our interpretation of item (ii) of the above is that the producers will be responsible for collecting from public roadways, public parks, and any other municipal property that qualifies. For the sake of argument, this could be referred to as recycling performed in the “public realm”, which would be more appropriate than the term “streetscape recycling” which is only one component covered by the regulation.

Public realm recycling is a new concept and not nearly as mature as a curbside blue box or blue cart program. There is a great deal of effort needed to research the program, purchase the containers, establish methods of collection, and educate the public. Since this is a fledgling area, the public will need time to become accustomed to new methods of dealing with their PPP while in the public realm. If similar to the evolution of the curbside and cart recycling system, it took many years to establish the efficient system of today.

In terms of evaluating RecycleBC's plan for public realm recycling we offer the following comments:

- In terms of the collection method and container design, colors etc. we agree with the plan. Our pilots have indicated that a 3 stream (containers, paper, garbage) container is the best alternative for obtaining the cleanest products;
- The plan appears to focus entirely on streetscape recycling, and ignores other municipally owned properties, such as parks. The plan should address how RecycleBC intends to pilot these other areas;
- The plan appears to offer only one solution, and that is to require that participating municipalities provide the capital to purchase the containers. Requiring taxpayers to front the funds to get a provincially mandated EPR program established, while they are also paying at the retail stores does not seem correct;
- The plan does not address alternatives to recycling, such as consideration of reducing public realm packaging, or opportunities to reuse public realm packaging. The 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, bags etc.;
- The plan does not address the need for continued and comprehensive public education around the need to recycle properly in the public realm;
- The plan offers municipalities an incentive of \$400/T to collect streetscape PPP. While we appreciate the offer, we are confused about how to allocate these funds given that the costs to setup and collect from this area are substantially more. Based on our 12 month pilot in Horseshoe Bay, we estimate that the costs will be in the \$6,500/T range for streetscape (and this does include the other more difficult public realm areas, such as parkscape). Without additional funds,

or a "direct service option" provided from Recycle BC, the collection of PPP for your members will require direct billing. Please give us some indication of how your members wish to be direct billed for these costs.

We are happy to discuss the public realm recycling further. The results of our pilot will be available in January 2019, and we are willing to share those results with you.

2018

Once again, thank you for allowing us to provide comments. Please do not hesitate to contact me for further discussion of any of these matters.

Sincerely,

A handwritten signature in blue ink, consisting of a stylized 'P' followed by a horizontal line that loops back under the 'P'.

Phil T. Bates, P.Eng.
Manager, Engineering Services

November 2017 Consultation Online Form Feedback Submissions

Village Of Salmo - Curbside Collection

Hello Recycle BC,

Thank you for this opportunity for input.

The Village of Salmo has raised our concerns with the proposed 5,000 threshold under which communities will not be provided curbside recycling services and we would like to ensure this concern is noted in your consultation paper.

Even though Salmo is a small rural community of 1,100, we are primarily residential and have curbside garbage pickup. Small rural communities are also often faced by higher energy consumption costs as a result of many people commuting to work in surrounding larger centers. We also have very limited tax bases (low property costs, low income, mostly residential) and have the most limited capacity of all municipalities to provide these services on our own (if Recycle BC does not provide financial incentive). That being said, we are generally civic minded and care about the environment, this was proven in our exhaustive community consultations over 2016-2017 and we found that what our people value the most is our clean air, water and access to nature and value being good stewards of these things. These values are enshrined in our document www.sustainablesalmo.ca Having every resident personally drive to a depot to deposit their recycling not only reduced recycling rates, but also increases GHG emissions and compounds an existing problem.

Our community, in particular, has submitted a "community expression of support for curbside recycling" to Recycle BC with 178 signatures. We were further told in May of 2015 that we on the waiting list for curbside recycling and promised that to our community and pleaded for their patience while we waited for our turn to come up to initiate negotiations with Recycle BC.

Now we have been told that day may never come. Please register our objection to this and sincere hope that you will reconsider this policy position.

City of Abbotsford - Research and Development: Other Flexible Packaging

The proposed research and development program for additional flexible packaging contains elements that are of concern to the City. In particular, the City is concerned with the proposed use of this material as an alternative fuel source and the potential impacts to the regional air shed. The City questions the claimed environmental benefit of utilizing this material in lieu of coal combustion, considering the increase in pollutants and greenhouse gases. The City has worked on similar air quality concerns with its partners at the Fraser Valley Regional District, who would welcome the opportunity to provide additional information and discuss this matter further with Recycle BC. The City would like participation to be optional in order for municipalities to decide if the program aligns with their respective strategic priorities and community values. The City also encourages Recycle BC to continue to work with suppliers and manufacturers to develop and use packaging that has viable recycling end markets.

City of Abbotsford - Streetscape Recycling

The Recycling Regulation requires producers to develop a plan to collect packaging and printed paper from residential premises and municipal property that is not industrial, commercial or institutional property; however, Recycle BC has not addressed collection on municipal property and streetscapes to date. The proposed approach for streetscape recyclables collection is a deviation from the current Recycle BC Program Plan in several aspects, and the proposed incentives do not reflect the cost of collecting packaging and printed paper from streetscapes. In addition, the City prefers to see participation in the Recycle BC streetscape collection service as optional. This would provide the City with an adequate timeline to implement streetscape packaging and printed paper collection along with other regional initiatives towards source separation and increased diversion.

City of Abbotsford - Contamination

The proposed changes to the curbside and depot collection agreements appear to result in more stringent contamination requirements. Based on the material presented at the workshop and subsequent discussions with collectors, the current contamination targets are difficult to achieve, and the proposed revisions will require increased education and costs for municipalities. The City recommends that curbside contamination thresholds be adjusted to more attainable levels, and that consideration be given to the sorting process that provides the final contamination level of materials prior to marketing.

In addition, there is still resident confusion regarding items that are recyclable and those that are not, which further contributes to contamination levels. This is despite significant efforts by the City's solid waste education program to guide residents in the transition to the Recycle BC program. The City suggests that items that are recyclable but not part of the Recycle BC program should not be counted as contamination as it is often producers that label items as recyclable.

City of Abbotsford - Depot Collection

The City understands that Recycle BC is proposing to discontinue the mixed paper and containers financial incentive for local government recycling depots in communities that receive curbside recycling collection. Local governments have made investments in providing "one-stop facilities to further waste diversion, and many have invested in facility upgrades to meet Recycle BC standards. Depots operated by local governments provide residents with an opportunity to drop off material that exceeds the size or quantity suitable for curbside collection, and offer recycling opportunities for residents that do not receive municipal curbside service, such as the multi-family sector in Abbotsford.

The Abbotsford Mission Recycling Depot (AMRD) drop-off depot is part of the Recycle BC network and is jointly owned by the City and the District of Mission. The proposed changes to the depot agreements would create an uneven playing field between the private and public sector, place additional cost on local ratepayers and result in a significant loss in revenue for the AMRD. In addition, the City expects to provide residents with the collection of mixed paper and containers at this depot as part of the basic service levels expected at all depots in the Recycle BC network.

Regional District of Kitimat-Stikine - Program Plan

The Regional District of Kitimat-Stikine submits the following in response to the presentation by Recycle BC of their proposed 5-year plan and the consultation forum which took place at the Anvil Centre in New Westminster, BC on November 15 & 16, 2017.

Firstly, the Regional District wishes to thank Recycle BC for the opportunity to participate in the consultation process and the roundtable forums and discussion which took place at the event. The Regional District is hopeful that the feedback generated at the event is sincerely taken into consideration by Recycle BC and that any changes implemented by Recycle BC take into account the many challenges facing communities in rural and un-incorporated areas of British Columbia.

With regards to the projected 5-year plan introduced by Recycle BC at the consultation event, the Regional District has concerns regarding several points identified in the plan. Under the proposed plan, expansion of the current Recycle BC curbside program is limited to incorporated municipalities over 5000 population, where curbside garbage collection was in place by May 2014. These standards for program expansion severely restrict rural areas and completely exclude unincorporated communities. It is the position of the Regional District of Kitimat-Stikine that these standards are unnecessarily restrictive and do not fairly allow for access to the program for all British Columbians.

During the presentation for the Program Plan, it was identified that the goal of the Program was to review eligibility requirements for communities wishing to be included in the curbside program and that Recycle BC would continue to add waitlisted collectors, including those who originally declined inclusion in the program. The Regional District of Kitimat-Stikine was originally denied inclusion in the program because it did not have curbside collection in place during the initial program roll-out. The Regional District has repeatedly expressed a desire for inclusion in the program and in turn have been told that we are on the waitlist. The Regional District would like to know the status of the waitlist and what is the criteria Recycle BC uses to select communities from the waitlist for inclusion in the program. The Regional District disagrees with the current practice of expanding the program to communities which previously declined inclusion over those which did not initially meet program requirements but have since introduced curbside collection to their communities independent of Recycle BC.

The Regional District is concerned that the standards Recycle BC uses to measure program success do not fairly represent the challenges faced by those living in rural BC communities. As an example, Recycle BC asserts that 98% of the Province has access to a depot. The measure used is related to driving distance, 30 minutes urban and 45 minutes rural. The Regional District feels that this is not an accurate measure as geographic distance alone should not define reasonable access. Demographics of the community must be taken into account. Several communities in the Regional District are not served by public transit, many residents do not own vehicles or have driver licenses, and the referenced 45 minute driving time likely does not take into account adverse weather conditions or other issues affecting rural travel. The Regional District believes that rather than Provincial measurement standards, access to the program and depots should be assessed at a regional level.

It was mentioned during the Program Plan Workshop that the Program was to focus on the outcome, not the process and that the stage would be set for evolution. The Regional District of Kitimat-Stikine did not meet program entrance requirements in 2014. Under the proposed program expansion, the majority of the Regional District still does not meet those requirements; the only exceptions are the City of Terrace, which is already a Recycle BC community and the District of Kitimat. For its part, the Regional District has, in the past 3 years introduced 3 stream curbside collection (Garbage, Recycling and Organics) to the Greater Terrace area, serving 2884 households. If the Regional District still does not meet the requirements for inclusion in the Program, then the Program needs to evolve further.

While the Regional District ultimately wants to be fully included in the Recycle BC curbside program, alternate forms of assistance from Recycle BC to serve more remote and rural communities would be welcome. In the past, the Regional District has proposed operating satellite collection depots at rural, manned landfill sites. The Regional District would like to transport the collected materials and drop off at the Recycle BC depot, (which is located in the unincorporated community of Thornhill) for processing through Recycle BC. The same depot currently serves as the Recycle BC Depot for the City of Terrace. This proposal represents an evolution of the Recycle BC program; bulk drop off of Printed Paper and Packaging (PPP). One party dropping off recyclable materials from 200 households must be recognized as a practical alternative to the same 200 households travelling 45 minutes or more by car to drop off the material individually for inclusion in the same Recycle BC material stream.

It must be acknowledged that the Regional District vehemently argued for inclusion in the initial uptake of the Program. We have since rolled out a full service curbside collection program and have introduced rural recycling and diversion initiatives. The Regional District wishes for a collaborative and cooperative relationship with Recycle BC for the benefit of all of our residents.

While Recycle BC takes the position of delivering the Program to those communities which make the most economic sense from a business delivery perspective, the Regional District counters that Recycle BC is ultimately funded by all British Columbians and as such all British Columbians deserve access to the program.

City of Kamloops - 3 Years of Recycle BC Data

As a new community to the program we did not receive a data package but we are curious about how multi-family and curbside tonnages are determined when the materials are mixed in the truck?

City of Kamloops - Marketing and Communications

-ReCollect: request that Recycle BC share materials lists with member municipalities

-Recycle BC could do more to educate people about packaging and printed paper. In our community there is a lack of understanding among many about the difference between "recycling" and "recycling PPP".

-Recycle BC could do more to educate about what the program is and how it works (what is EPR-user pay recycling system)

-Recycle BC in partnership with other stewards could do more to differentiate recycling from curbside recycling.

City of Kamloops - Contamination

Shredded paper in paper bags or clear plastic bags- we understand current rules, but we'd like some clarification on future rule plans (i.e. will everyone be going towards paper bags?) so that promotional materials are created using appropriate messaging for residents.

-we feel well supported by Recycle BC in contamination reduction work. Continued support by field representatives is important.

-could Recycle BC share detailed contamination reduction strategies by collection method (ie, single stream auto carts) for areas that have seen success? It was good to hear about what other communities are doing in the workshops but a reference document would be helpful to refer to and help validate tactics in the field. for example, how much contamination should be tolerated before leaving a cart behind?

-One of the suggested contamination reduction strategies is to witness material delivery at the receiving facility. collection staff require a Recycle BC escort to enter the receiving facility. It would be helpful to be able to observe material delivery without requiring an escort.

City of Kamloops - Depot Collection

-Currently, we are essentially the ones providing advertising for Recycle BC depots. Who should be covering this cost? Other municipalities may run the Recycle BC depots in their area, but we do not in our case. Perhaps greater incentives are needed for us and others in this situation, or further requirement for depots to advertise.

-We would like better communication from depots.

City of Kamloops - Multi-Family Collection

-Same general comments as curbside collection for changes that span both forms of collection.

-Contamination reduction is a challenge across the board with multi-family sites. It would be great if Recycle BC provided research and best practices for reducing contamination in the multi-family sectors.

-Re: reduced incentives where cardboard is collected separately:

- What does that look like for us in terms of reporting?
- What is the expectation for collectors in determining where cardboard collection is provided by another collector?

-We'd like to request more receptacles at multi-family sites (Recycle BC to provide). E.g. blue boxes for glass for strata to take to depots.

City of Kamloops - Curbside Collection

-Good idea to net out contamination from the bonus calculations. We are concerned with how contamination is calculated:

-Is there a way to provide a weighting mechanism to materials such that contamination rates better reflect the level of contamination? Is there a way to incorporate both volume, weight, item count, and severity to calculate contamination rate?

-We are concerned about the validity of contamination rate for our community with only 1 sample over a 6-month + period. Is the contamination rate accurate with only 1 sample?

-We support the idea of requiring promotional and education incentives be spent accordingly. It's important to define what qualifies for P&E expenditures. For example, does a curbside audit qualify as P&E? Is staff time included?

-Claims reports – is it possible to provide more user friendly claims reports? I.e., the date format in the claims reports require 3 manipulations to format so that they can be integrated with our internal data tracking systems. Also the ticket numbers include an extra letter that we remove so that data can be integrated into existing systems (change field from a text string to a number must remove the letter and format as a number)

-Bonus calculations- transparency on how bonuses are calculated for our community where some routes have curbside and multi-family materials mixed in the trucks.

-Incentives – based on what we learned at the consultation regarding contamination, it is apparent that contamination rates are higher for single stream collectors using automated carts than multi-stream collectors. Would it make sense to require single stream cart collectors to spend MORE on P&E (e.g., a higher P&E incentive for single stream collectors using automated carts)?

-We support incentives being given to include Recycle BC logo on containers, if required. However, we are also cognizant of not confusing residents by giving them the impression that all materials and items can be recycled in the containers ("Recycle BC" name), as well as the blue box symbol. We'd prefer not to include the logo for various reasons, including the possibility of a brand change in the future.

-Re: advanced approval of promotional material, including our calendar

-Our concern is commitment to timelines and guarantee of turn-around time. Please commit to a time frame for turnaround.

- Please make sure Terms of Reference for conflict resolution is captured in the agreement, in the event there are disagreements in acceptability of promotional material.

- How are density calculations quantified for "service area density"? In Kamloops, the density of the city as a whole is lower than density calculated within individual neighbourhoods. We see this as a disadvantage.

-We'd like to echo RDCO's comment re: collectors with high contamination have low incentives. It would be wise to increase education funding for these communities until contamination rates drop.

District Of North Vancouver - Streetscape Recycling

Incentive offered to carry out recycling is not sufficient to encourage Municipal sign on.

Container requirements are onerous and purchase should be supported in full or part by Recycle BC.

Yearly audits to be funded by Recycle BC.

Reporting is too onerous based on financial incentives proposed.

District of North Vancouver - Contamination

More transparency required in waste audit procedures.

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.

District Of North Vancouver - Depot Collection

General issue of residential recycling and cardboard being refused at Depot's will cause general upset amongst residents and complaints to Municipalities.

No objection to use of Recycle BC logos so long as it does not place a greater burden on the Municipality.

Concerned over use of logo should it not outlive the life of the asset (blue box/gags).

No objection to approval of promotional material with the provision that any approval will not hinder Municipal operations.

Depot proposals for Level 3 depots are unacceptable and need to be completely reviewed with an alternative model being presented. Some residents prefer to use depot rather than curbside as they produce large amounts or from time to time (Christmas) produce large amounts of cardboard not suitable for curbside collection.

District of North Vancouver - Multi-Family Collection

No inflationary rise in rates over contractual period put too great a risk with the Municipality, would prefer to see some form of inflationary mechanism, built into new contracts.

More detail required as to requirement for collectors policy on tagging with a view that this should not result on a greater burden being placed on the Municipality.

No objection to use of Recycle BC logos so long as it does not place a greater burden on the Municipality. Concerned over use of logo should it not outlive the life of the asset (blue box/gags).

No objection to approval of promotional material with the provision that any approval will not hinder Municipal operations.

Reduction in administrative top up does not recognize work being done by Municipalities and requirements for future checking and approval of promotional materials - rates should remain as previously set as a minimum.

Consider increased educational top up/household linked to recorded reduction in contamination from multi-family - incentive to do more to get more.

Bonuses (KG/household) are almost impossible to achieve and with a reduction in packaging from suppliers and resident education reducing packing at curbside this should be reconsidered - link contamination rates into the bonus system, deposit glass should not be netted off against total weight.

Cardboard is going to be a major issue if reductions are placed on the Municipality if collected via a different stream - Municipality has no control over who collects or records.

Who will fund the purchase of any containers required to collect cardboard.

District of North Vancouver - Curbside Collection

No inflationary rise in rates over contractual period put too great a risk with the Municipality, would prefer to see some form of inflationary mechanism, built into new contracts.

More detail required as to requirement for collectors policy on tagging with a view that this should not result on a greater burden being placed on the Municipality.

No objection to use of Recycle BC logos so long as it does not place a greater burden on the Municipality.

Concerned over use of logo should it not outlive the life of the asset (blue box/gags).

No objection to approval of promotional material with the provision that any approval will not hinder Municipal operations.

Reduction in administrative top up does not recognize work being done by Municipalities and requirements for future checking and approval of promotional materials - rates should remain as previously set as a minimum.

Bonuses (KG/household) are almost impossible to achieve and with a reduction in packaging from suppliers and resident education reducing packing at curbside this should be reconsidered - link contamination rates into the bonus system, deposit glass should not be netted off against total weight.

Salt Spring Island Community Services Society/Salt Spring Island Recycling Depot - Depot Collection

Paying Island Depots (no curbside here) so much less to do so much more than curbside is a travesty! We give more service to the public by being here five days a week, take curbside materials plus plastic film, expanded foam, and glass. The materials we bale save shipping on those materials by more than 90%. Those savings alone amount to much more than we receive from RecycleBC. As we bale at a ratio of at least 10 to 1....our Plastics Roll-off Bin (22 trips this year) would have been at least 220 trips in loose form. That alone saves you folks \$90,000 a year! We service 6000+ households plus have a large population living on boats. The app \$55000 per year paid for PPP service by RecycleBC = about \$9 per household per year. Our Cost for PPP service alone is \$40 per household. This is most certainly not "fully funding PPP collection throughout the Province". The Capital Region is not obliged to subsidize us and probably will not in the future. While RecycleBC has done an outstanding job of taking over responsibility for PPP collection in BC, you seem to have totally miss-judged the Gulf Island section and in effect, have put a death sentence on Depots that are probably the most efficient around. Why is a household on Salt Spring worth only \$9 a year??? It is actually quite insulting. Even with new improved funding outlined in the Meetings. We will still be far far from sustainable. Our other EPR funders are paying their share, why not RecycleBC?? We love working with you folks but there has to be some equity here. Thanks for the opportunity to provide feedback.

The Clorox Company - Curbside Collection

The Clorox Company of Canada Ltd. has been a registered steward under the Recycle BC program since the program's inception. Additionally, we have a long established history of supporting British Columbia municipalities since the early 1990s with the design and implementation of highly successful waste diversion strategies that include the utilization of the GLAD See Through Blue Bag. Our Glad® brand is the category leader in the trash space and Glad® is Clorox Canada's largest revenue business, playing a critical role in supporting 377 direct and approximately 1,200 indirect Canadian jobs.

We are writing today to voice our strong opposition to the proposed 18 month transition away from bags and ask that this stipulation be struck from existing and future contracts between Recycle BC and its municipal partners.

As a steward facing a double digit cost increases to our stewardship fees in BC next year, we don't support the elimination of a waste management solution that has been shown to have lower all-in operational and capital costs than either carts or blue boxes with similar, if not better, diversion and contamination rates.

Looking forward, China's National Sword initiative has changed the dynamic for end markets that the program has relied on for the recovery of approximately 20% of its costs. While Recycle

BC has chosen not to increase tonnage rates this year and dip into reserves, the demonstrated ability of none of the present cart, bag or blue box curbside collection strategies to hit the extremely low contamination rates being demanded by the Chinese, make the viability of this strategy suspect and the likelihood of additional cost increases highly likely. In this scenario, elimination of provincial markets for blue recycling bags as we work with partners from Green by Nature to investigate the opportunity to become a potential domestic off-taker of post-consumer resin is counterproductive to the goal of a domestic circular economy.

Additionally, transitioning out of bags eliminates important sources of revenue for the very stewards that support your programs that sell either branded, as is our case, or private label blue recycling bags in the province. This business supports well-paying jobs for hard working Canadians, generates tax revenues at the local, provincial and federal level, as well as investments in manufacturing and R&D here in Canada.

Presently, communities across British Columbia including the District of Mission, Abbotsford, Chilliwack and Salmon Arm have implemented highly successful recycling collection programs that include the use of see through blue bags. The option to use bags is popular with residents and municipal waste systems alike because they are scalable, easier to manage for disabled or elderly residents, resistant to wind and don't take up a lot of increasingly dear space in BC homes and garages as they can go directly from the kitchen to the curb. Residents in these communities should continue to have the option to use bags.

Even municipalities with cart-based systems have voiced the support for the use to bags for surge capacity. Why should recycled material end up in the trash when there is an easy option available to keep this material out of the landfill? Additionally, bags should be viewed as a complement to blue boxes in communities where this approach is used as they can help solve wind and surge capacity issues, can go seamlessly from the kitchen to the curb and can help improve the quality of the recyclables in the boxes.

Recycle BC's proposed move to promote a blue box system as the preferred choice for curbside collection was preceded by a similar approach in Ontario in the 1990s and 2000s. B.C. can learn important lessons from their experience. Today, Ontario municipalities continue to wrestle with the limitations of blue box systems beyond their lack of all-in cost-competitiveness, specifically: litter issues caused by wind and limited scalability. Subsequently, Ontario is experiencing a resurgence of interest in evolving programs to enable residents to utilize see through blue bags to place recyclable contents curbside either with blue boxes or as a stand-alone. This spring, the region of Halton, Ontario decided to allow residents to use recycling bags to collect and store their recycling materials for collection. Other jurisdictions across the country, like those in Atlantic Canada continue to expand curbside blue bag recycling programs.

In analyzing the processing side of the equation, separating a collection mechanism or tool (blue recycling bag) from waste (shopping bag) is critical. Any survey of MRF operations will show that the overwhelming majority of the bags getting wrapped around machinery are shopping bags not blue recycling bags. As such, blue recycling bags shouldn't be made the culprit for down time at municipal recycling facilities. Investments in bag breakers or additional sorting staff to better accommodate recycling bags will also help deal with the shopping bags (which are the real issue) and pale in comparison to the capital investments necessary to implement cart or blue bin programs.

We thank you for the opportunity to provide our feedback and look forward to the opportunity to continue the dialogue with Recycle BC about this proposal.

Resort Municipality of Whistler - Streetscape Recycling

Hello,

Streetscape collection would be an important tool for many communities, especially for communities that support tourism; inviting pedestrian traffic who generate streetscape waste. It would be important for Recycle BC to remain flexible in its approach to this program as not all communities are the same.

Some communities are required to ensure that all collection bins use are designed to be Wildlife proof, which means that local Wildlife cannot gain access to waste material stored inside. Preventing the destruction of Wildlife by demanding that waste be stored securely should be a RecycleBC directive for all programs.

Recycle BC should also be flexible when it comes to configuring streetscape bin systems. As long as Communities comply with cross contamination rules, they must be granted the flexibility to self-determine what waste stream should be collected at each streetscape location. Flexibly to comingle, segregate or not include a waste stream due to a lack of specific waste generated around that location.

We look forward to seeing how Recycle BC intends to roll out this program in 2019.

Thank you for the opportunity to provide feedback.

Emterra Environmental - Other

I would like to firstly congratulate Recycle BC on a consultation session that was well organized, engaging and thoughtful. The event impressed me and everyone that I have spoken to, so kudos to your team!

With respect to feedback on the proposed changes and information presented at the consultation, Emterra would like to comment on the following:

1. We support the proposal for curbside collection fees to be structured based on the container type, not just the material stream. This is a more accurate reflection of operational costs.
2. Education Top Up and Service Administration Top Up should be offered to organizations who subcontract with Recycle BC directly (not just municipal or First Nations subcontractors). These organizations are doing comparable levels of work but do not receive compensation for it.
3. We support the proposal for the establishment of thresholds for cross-contamination (both in multi-stream collections and segregated glass). Accordingly, we encourage Recycle BC to revise the definition of Non-Targeted Material to include cross-contaminated PPP.
4. We encourage Recycle BC to frame the conversation around contamination based on Non-Targeted Material, rather than Non-PPP, particularly when discussing operational performance (i.e. measuring collector performance, rate setting, key messages in education, etc.). Non-Targeted Material is a more accurate and real reflection of operational environments (e.g. for all collectors and processors, contaminated PPP is contamination).

Thank you for your consideration.

Mayne Island Recycling Society - Program Plan

I have a question about your business plan for small rural isolated depots. Since the onset of the original MMBC plan, we at the Southern Gulf Islands Recycling Coalition have made it very clear that the payments from RBC do not come close to covering our costs to collect PPP. Since you have been aware of this and have not changed your payment approach to our depots, I am wondering what your business plan is for our survival, or if your business plan is for us to close our doors. This would be helpful for us to know for our ongoing planning. Thanks for your response.

Mayne Island Recycling Society - Depot Collection

- 1) Small rural depots need additional funding. The current funding is inadequate.
- 2) Small rural depots need an alternative to funding by tonnage. Unless the plan is to starve these depots to death, a better system needs to be found during this round of consultation. Small depots are producing a product with very low contamination. The average contamination (contamination plus nonrecyclable material in the program) rate of 15% (from the contamination seminar) means we are saving you 15% on your costs per tonne by our lack of contamination. (This doesn't even include the cost to the processor (ultimately born by RBC) of one hour in down time per every four hours of operation needed to unplug the incorrectly recycled plastic bags from the sorting line. There are virtually no miss-sorted plastic bags coming from our depots to plug up the sorting lines in the processing plants.) In addition, by baling almost all the products we can, we are saving GBN and ultimately RBC a huge amount in transportation costs. Because the baling incentive doesn't fully cover the cost of baling, we are spending money to save you money.
- 3) Waste to Energy (dressed up as engineered fuel) is something that needs to be avoided. While it is superior to landfill, it offers producers a non-recycling stream that should not be present in a recycling program and must be discouraged. The producer payment for this material must be increased substantially to discourage the use of this non-recyclable material and its subsequent use for fuel. Because it is such a low weight alternative, the waste to energy option and relatively low producer payment encourages its use rather than discouraging it. This must be changed.
- 4) Producers' fees need to be significantly increased for styrofoam to discourage its use. There are other ways to package breakables, and they need to be encouraged over the lightweight and therefore cheap (cheap for the producer and expensive for the environment) alternative of styrofoam.
- 5) Soft plastic needs substantially higher producer fees. According to the contamination seminar, miss-sorted plastic bags cause sorting lines to be shut down 25% of the time. That means that 25% of sorting costs are attributable to soft plastic. That cost should be borne by the producers/users of the material.

City of Nelson – Other

The City is worried about the proposal to phase out use of blue bags. If this change is implemented, then the City will need to purchase different collection equipment and collection methodology. Currently the City is able to collect garbage bags and recycling bags utilizing a split truck with manual loading on a bi-weekly basis. Prior staff experience with open blue bins at curbside leads us to believe that lidded carts will be required, necessitating automated pick up. The City has been looking at a number of different automated pieces of equipment but has not to date been able to identify a piece of equipment that is believed would feasibly allow for biweekly pickup. At this point we are concerned that we will need to switch to the cart style pick up on a weekly basis. Unfortunately, this approach appears to require a doubling of our collection efforts which the City is concerned will equate into doubling our collection costs.

Pender Island Recycling Depot - Other

Recycle BC views the recyclables Depots collect as a commodity and pays for them as such. Depots provide a service, and the cost of providing that service is in no way correlated to the value of the material. Please accurately determine the cost of collection for depots for different materials (e.g., Styrofoam, soft plastics, paper products containing a liquid) and pay accordingly. Pass the cost of collection on to producers, as the BC Recycling regulation sets out.

Most Depots are underpaid for collecting these materials. On the Gulf Islands, we do an excellent job of providing the service at a very low cost. Trucking fees more or less cover our trucking expenses, so our remote location is not really what is driving the financial shortfall. We are simply underpaid for the service we provide. Bailing incentives also do not cover the cost of bailing.

Recycle BC is proposing to pay Depots the same low rate for collecting multi-laminate plastic as for collecting soft plastic. If we are underpaid to collect the material, this savings is passed on to the producer who can continue to use the material at a discounted rate. The cost of recycling packaging needs to be built in to the cost of using it, and that can't happen if we are paid for the materials value rather than the cost of collection. Producers use these materials at Depotsâ€™ expense.

A lot of these low value materials are collected primarily at Depots, and without Depots, these materials would end up in landfills, roadsides and bodies of water; thus Depots provide an invaluable service.

Pender Island Recycling Depot - Depot Collection

The Depot presentation was disappointing. Depot operators repeatedly asked why Recycle BC didn't want to pay for cardboard collected from Depots in areas with curbside collection. The Recycle BC presenter said that Recycle BC wanted to avoid a duplication of service. When operators questioned this logic and pointed out that the product collected at Depots was cleaner, drier and less contaminated, the presenter still insisted that residents shouldn't have any reason to bring their cardboard in to Depots. Operators offered several possible reasons why residents might choose to bring their cardboard in to Depots (moving, large clean out of basement, etc.) and why this might be advantageous to Recycle BC (less trips back to the

unloading station for the collection trucks; cleaner, drier product, etc.) with no real conversation on the Recycle BC representatives part. The conversation went back and forth and back and forth - until finally she commented that Recycle BC doesn't want to fund the collection of ICI material, which could be being dropped off at Depots.

That sounds like the real reason Recycle BC doesn't want to pay for Depot cardboard in areas where there is curbside collection, and any Depot can understand this concern. However, if the conversation with Recycle BC isn't open and direct, we can't get to the root of the concerns Recycle BC has in representing Producers interests, and also, the concerns that Depots have in collecting recyclables and being fairly compensated for it.

In a true consultation, Recycle BC and the Depots collecting cardboard in areas with curbside collection could work out the pros and cons of Depots in areas with curbside service continuing to collect cardboard. However, if Recycle BC withholds their concerns and no real dialogue happens, then the relationships between Depots and Recycle BC become strained. Only in partnership with the recycle Depots, can Recycle BC fulfill its obligations to producers in the most cost effective and environmentally sound manner.

Pender Island Recycling Depot - 3 Years of Recycle BC Data

How many tonnes (for each category) of styrofoam packaging, of soft plastic packaging, and of multi-laminate plastic packaging are used in BC annually? For each of these three categories, how many tonnes are recovered by Recycle BC?

Pender Island Recycling Society - Depot Collection

Recycle BC's evolving Packaging & Printed Paper (PPP) program is still missing a depot group: Isolated, PPP Primary.

The Pender Island Recycling Society's (PIRS) recycling depot is accurately described by this depot label: PPP collection is our primary function, rather than ancillary as is the case with Encorp bottle depots. PIRS recycling depot has fixed operating costs in collecting PPP regardless of the other recyclables accepted at our facility. Our depot is efficient; at every turn, trying to deliver services in an economical and environmental responsibility manner. Visits by Recycle BC, CRD, and GBN staff concluded the same thing: No other efficiencies to be found here. (Note: Funding of non-PPP services and our Reduce and Reuse initiatives are independent of PPP collection financing.)

In addition to per tonne incentive financing paid to the Capital Regional District (CRD) for PPP collection by our island depot, baseline funding needs to be provided to the CRD to cover the fixed costs of PIRS collecting PPP from residents on the local government's behalf. This baseline funding from Recycle BC would not vary with the tonnage of PPP collected (our PPP tonnage is principally fixed due to our isolation).

While the proposed Recycle BC Incentive Rates (\$/Tonne) for depots would increase revenue to the CRD by 11.5% (for the PIRS depot operation), the total dollar figure generated still falls far short of the funding necessary for Pender Island Recycling Society to deliver efficient and entitled packaging and printed paper collection to Pender Islands residents. Proposed Group 1

“ No Curbside/Multi-Family Applicable Incentive Rates would cover only 20-30% of PIRS annual operating costs in collecting PPP (costs that are likely going to increase with a focus on heightened product quality).

Recognizing an additional depot group type and adding a baseline funding component is central to Recycle BC providing appropriate funding for the collection of PPP by Pender Island Recycling Society and the other Southern Gulf Islands Recycling Coalition (SGIRC) depot operators. The relatively small amount of additional income needed for Recycle BC to provide this baseline funding to the CRD for PPP collection on the Southern Gulf Islands can be easily offset by a small increase in fees paid by PPP producers, in particular those using non-recyclable or difficult to recycle packaging.

During Session 4 “ Depot Collection, Recycle BC’s Jordan Best said: “... of course we need to properly support the [Southern Gulf Islands Recycling Coalition] depots. He was unable to answer when I asked: At what percentage of our PPP collection operating costs does properly support equate to?

Recycle BC should keep in mind that Pender Island Recycling Depot, and the other SGIRC depots, collect PPP at a higher rate than most other residents of British Columbia (53.3kg vs 40.7kg - Recycle BC 2016 Annual Report) and with very low contamination rates (saving Recycle BC a substantial amount of money).

The late (and truly missed) Ann Johnston would have made several comments about the updated Recycle BC program. Two of these points would have been:

1. Southern Gulf Islands residents MUST NOT pay twice for PPP recycling collection (a core principle of the B.C. Recycling Regulation); SGIRC members continue to argue that the CRD subsidy provided to its depots for PPP collection, to top up the underfunding by Recycle BC, is a double charge of consumers: therefore in breach of the B.C. Recycling Regulation.
2. In all of this debating, we MUST NOT lose sight of the provincial pollution prevention hierarchy. (BCRR 5(3): pollution prevention is not undertaken at one level unless or until all feasible opportunities for pollution prevention at a higher level have been taken: (c) reduce . . . and (d) reuse the product; that the PPP producer must be deterred from using difficult to recycle or non-recyclable packaging. And, waste-to-energy should be an expensive option.

During Thursday morning’s Contamination workshop, Recycle BC’s Bill Patton proudly pointed out the Recycle BC slogan: Making a difference together. He then said: We really believe this . . . [working cooperatively with] residents, producers, collectors, and post-collection partners and other stakeholders.

Ann Johnston would have replied: Show us the money; that our island residents are entitled to. And: Your slogan would better read - Making the environment healthier together.

Please let me know if you would like to discuss the content of this feedback submission further.

Alberni-Clayoquot Regional District - Depot Collection

The Alberni-Clayoquot Regional District (ACRD) operates 2 Recycling Depots (run by contractors). One located in the City of Port Alberni and one at the Alberni Valley Landfill which is located in the Sproat Lake Electoral Area. Both depots have a high volume of traffic and

material collection.

The depot located in the city is used by multi-family residents and residents of our Cherry Creek Electoral Area, and of course by everyone who recycles their foam packaging, plastic bags and overwrap and glass bottles and jars. This Depot also hosts many of the other stewardship programs who are contracted out with the contractor who runs the depot. This depot bales all material, which is a very efficient method to transport the material to the mainland.

The depot at the Alberni Valley landfill is used by residents of Sproat Lake and other multifamily residents in the area of town. This depot does not bale any material; it is all hauled in mega bags to the mainland.

Both depots are supported by the Regional District and Recycle BC incentives. The ACRD provides curbside collection to the City of Port Alberni single-family residents and the Beaver Creek Electoral Area. We do not provide or ever will provide curbside pick up to any multi-family residences as this is not in our jurisdiction. Therefore, the only option is to run depots to provide the opportunity for recycling.

The ACRD purchased the property and building to operate the depot in the city. We pay the contractor to run the facility and we pay for all of the upgrades and maintenance. We do not make any money running the depots. Removing the incentives we receive for Categories 1, 2, 3b and 3a, 6, 7 would put a huge cost on the Regional District. One, which may force the ACRD to close the sites. These services are not part of the tax requisition of the ACRD or the City of Port Alberni.

Please do not eliminate these depot incentives, it would be a huge step back for the Recycle BC program, as there would be limited recycling opportunities to a great portion of the Alberni Valley.

Galiano Island Recycling Resources - Depot Collection

Thank you for the opportunity to give feedback. With regard to depot collection, with respect to all inclusive depots in remote areas (i.e. areas where no other recycling services exist or can be accessed owing to geographical situation), the funding model which you present, even with the proposed increases in returns from cost of living increases and the addition of new categories and consequent incentives, is completely inadequate for us to continue operation. At the present time you are providing, on a tonnage analysis, approximately one fifth of our operating needs. This leaves our depot in need of top up funding from our regional district (double dipping) as well as community memberships and donation/fundraising to make our depot viable. The increases in baling incentives which you offer will only mean the shift of this income from GBN to the collection side of the register. The additional funds for tonnage collection is only a cost of living increase. We need more money for our depot's existence in the first place.

Depots such as ours were founded and offer a complete range of PPP recovery, including the styrofoam, glass and plastic bags which are unavailable to curbside residents, except at designated depots in their communities. Our collections are cleaner and result in far less contamination than curbside pickup. As well, these depots are the only game in town for any

sort of recycling and, consequently, save our environment from the dumping of these items as garbage should our depot not exist.

Given that your programme was to offer a seamless transition (BC regulation statement) from our previous contract with the CRD and that we have received numerous fruitless examinations of our depots for operational efficiencies, i.e. no further efficiencies could be suggested, we suggest that depots such as ours need to be placed in an entirely new and separate depot designation with the realization that ours is an economy of scale that cannot exist on tonnages produced. I note that the curbside programme has no reference to such a measuring stick. Further, as PPP continues to evolve. packaging weighs less and becomes more bulky. Added to this problem is the need to sort and place apparently recyclable PPP materials in the garbage stream at present, an additional cost to our depots. I am hopeful that with the addition of a category 9, a good portion of this problem will be addressed. However, we cannot rely on present practices to change in a sufficient and timely fashion to solve the problem. There needs to be some sort of pressure that can be applied by your organization to effect change in the behaviour of its members. How can this be done? Greater participation fees, fines?

Our community members want to recycle. They honour the first two aspirations of the recycling hierarchy, reduce and reuse, incorporate OCB, glass, newspaper and plastic containers in their daily lives in gardens and workshops. Given that consumerism on the ever increasing scale that exists, is a threat to the existence of our planet, such behaviour should be acknowledged.

In your mission statement you pledge 'To be a trusted environmental advocate and community partner offering equitable, effective and efficient residential recycling services.' For us on Galiano Island, this would mean finding a different formula and designation for our depot which would provide us with a realistic operating budget, so that we can continue to offer a high quality service to our residents who are citizens of our province and deserve a recycling programme which is equal to that offered to the greater provincial community.

Thanks for the opportunity to express my concerns. The question I have is: CAN YOU PROVIDE US WITH GREATER FUNDING TO MATCH OUR NEEDS AND ENSURE OUR CONTINUED EXISTENCE?

Carton Council Canada - 3 Years of Recycle BC Data

Carton Council commends Recycle BC for sharing a large quantity of data during the 3 Years of Recycle BC Data workshop session. Missing from this body of data, however, are material-specific recycling rates. As you are aware, the packaging and paper stewardship programs in Quebec, Ontario, and Manitoba publish material-specific recovery rates on an annual basis. In all three provinces as well as in BC, these are in turn used to calculate material-specific fee rates. Having this information would allow organizations such as ours to measure our progress in BC. It would also allow Recycle BC members (brand holders and first importers) to report out against the targets they have set as part of their corporate social and environmental goals, as well as equipping them with the necessary information to address consumer enquiries on this matter

Regional Recycling Nanaimo - Depot Collection

Hello there,

Could you let me know how you came about formulating the new proposed incentive rates for depot collection in 2019? Also, would Recycle BC assist in financing balers or densification equipment? Thank you,

City of Salmon Arm - Curbside Collection

The City of Salmon Arm is currently running a single stream curbside collection process with single use clear bags. We acknowledge Recycle BC concerns regarding the use of single use plastic bags for a variety of reasons including manual processing and environmental concerns. The City, however, wishes to continue to use the bags for the collection container until a suitable alternative is readily available on the market (ie. a see-through reusable bag). Our reasons for this request are as follows:

- The largest opportunity the City has for reducing our contamination rate is curbside enforcement by the contractor. Clear bags offer an opportunity to review the materials unmatched by any other collection container (blue bins and opaque reusable bags offer a look at the TOP only, carts offer no opportunity to review). Reducing contamination is a high priority to Recycle BC, affects your bottom line in resale value, and as such it seems short-sighted to ban the use of clear bags without a suitable alternative.
- Open bins, the next best option for contamination rates, require a significant amount of plastic to create, are not recyclable through Recycle BC's program and significantly contribute to neighborhood littering, making them arguably less beneficial to the environment than the bags. Additionally, they do not offer a solution for excess materials and the majority of our residents put out material in excess of one bin per collection and collectors generally do not seem enthusiastic about the bins for their own operational reasons.
- We note that Recycle BC is offering a staggered payment rate for the different types of containers. This suggests that Recycle BC is already making up the increase in operational costs for the manual bag opening by paying collectors less. This is fair considering the extra time and issue the bags cause for Recycle BC processors.

In conclusion, the City is petitioning to continue the use of the single use clear bags indefinitely into the future until such time as an EQUIVALENT reusable alternative is available on the market in order to continue to provide Recycle BC with low contamination rates. We feel that the staggered payment rates offered by Recycle BC are fair given the additional processing issues created by the bags and that the reduced payment should offset the concerns provided by Recycle BC.

Also, if possible can you please post the contamination workshop webcast to the consultation website. We were unable to attend the event, but are most interested in the material covered.

Thank you for the opportunity to provide feedback.

Town of Osoyoos - Curbside Collection

Good afternoon Linda,

Thanks again for providing us with the opportunity to participate in the recent Public Consultations in New Westminster. As I expressed to you at the conference I have a few concerns with the proposals Recycle BC presented and so I am sending them to you in writing as requested.

1) The elimination of Blue Bags in our community will not be well received by our citizens. Recently we asked several groups about switching to a cart based curbside collection system and the over whelming response was NO. Our elderly citizens find carts cumbersome, hard to maneuver and difficult to store and they are adamantly opposed to any sort of container based curbside collection system. We are also of the opinion that implementing this home based source sorting will drive residents to simply place recyclable items in the garbage entirely defeating the goal of recycling.

The Town of Osoyoos is also entering into a new curbside collection contract within the next month which has pricing based on our existing blue bag curbside collection system. We are not sure what effect your forced elimination of our blue bag program will have upon pricing in this new 7 year contract. At the very least the Town will have to purchase and distribute blue bins to all residence which will result in a substantial cost for our very limited operations budget. Will Recycle BC be administrating the maintenance and distribution on these new blue bins or will this be something which will be downloaded to the Town of Osoyoos?

2) The proposed elimination of fees for depot collection of fibre will also not be well received by our community. Our community frequently utilizes the large 40 Yard container at our Landfill to dispose of fibre and the elimination of this service will certainly be noticed by the citizens.

Ann Son- Bottle Depot Owner/Operator? - Other

There should be an increase in handling fees for products, especially for glass jars. It takes up too much space in the Depot.

Regional District of Kootenay Boundary - Depot Collection

Comments arising from the Nov. 15 webinar on proposed changes to the Depot Collectors Agreements

- 1) The cost of insurance required by Recycle BC for Depots is not compensated at either the present or proposed incentive rates.
- 2) The cost of storing materials is not covered by either present nor proposed materials incentive rates.
- 3) The cost of providing staff over-site of the Recycle BC drop off depots is not covered by the present or proposed incentive rates
- 4) The increase in incentive rates proposed (Plastic, Styrofoam, glass) will not cover the costs associated with providing depot space, insurance, storage space, and staff time.
- 5) The proposed description of the different depot types discriminates against First Nations and Local Governments. Clearly Recycle BC would like to end their relationships with these service providers.

6) The proposed incentive rate for 'other flexible packaging' is not sufficient to provide staffing time, insurance, depot space or storage space.

7) It does not appear that Recycle BC has researched why residents actually use depots. I would suggest that this be done prior to addressing a problem that may or may not actually exist. More research needs to be done before simply describing depots as a competing duplication for the curbside service.

The business model for Recycle BC is urban (quantity) biased. Most rural areas will not make the threshold for profitability. Yet the resident has paid the Recycle BC recycling levy and the tipping fee as the material inevitably ends up in the environment (landfill).

This is a business model that does not work throughout all of BC.

Author unknown - Streetscape Recycling

The Recycling Regulation mandated the collection of PPP from residential premises and streetscapes. In its Stewardship Plan, RecycleBC included a qualifying statement related to streetscape collection where they will develop a preferred approach to streetscape collection services which included carrying out pilot projects with stakeholders. To date, RecycleBC has not addressed its obligations on municipal property/streetscape.

Concerns

Packaging Stewardship Plan: The proposed approach for streetscape is a deviation from the RecycleBC stewardship plan, as the new proposal seeks to offload processing and marketing requirements to collectors rather than using existing post-collection services.

Streetscape Offer: RecycleBC's proposed offer is significantly lower than the costs to provide streetscape collection? If no local government agrees to accept the offer, will the Ministry view this as non-compliance?

Proposing that in order to participate in the streetscapes program, municipalities must have certain types of bins.

- o This will exclude a number of municipalities from participating in the program.
- o Recycle-BC should work with local governments to determine an appropriate approach to developing a streetscapes program that is inclusive of all communities (this has not been the case at all)

Taking the current approach will still result in all costs for streetscape/public space recycling management on local governments.

Author Unknown - Streetscape Recycling

Require Recycle BC approval of policy on tagging contaminated material at the curb and tracking of associated metrics. Additionally, Recycle BC can exercise its right to require advance approval of significant promotion and education materials, including annual recycling guide/calendar, regardless of whether it includes the Recycle BC Our suggestions:

â€¢ Prefer that Recycle-BC work with collectors (given the diverse nature of each municipality) to determine best approaches for tagging based on individual community.

â€¢ Recycle-BC should develop and research best practice approach and criteria (that can be

tailored to different community programs) developed to ensure that education through tagging and non-collection of contaminated carts is successful and it results in behavior change amongst residents towards properly recycling.

â€¢ We would rather prefer that Recycle-BC work with collectors to develop applicable material instead of mandating approval. We view this as partnership not one-way direction.

â€¢ Potential delays to publishing materials could arise. Require timelines to be established with Recycle-BC for response and should solely be for recycling.

Author Unknown - Curbside Collection

Recycle-BC proposes to increase the incentive rates based on collector collection programs. The proposed incentive rates for single stream collectors using automated carts has been increased by approximately 4% for curbside and 8% for multi-family, which is lower than other curbside groups given the lower ongoing collection cost associated with automated cart-based systems and the high levels of contamination typically found in these systems.

Furthermore, Recycle BC is proposing to provide a higher service administration top-up rate to those local governments and First Nations that operate curbside recycling programs using local government or First Nations employees as collection staff, compared to those that contract collection services to an external service provider, given the increased administrative costs associated with managing internal collection employees.

Our concerns are as follows:

Contamination is covered through a separate mechanism in the contract (penalties) which seems that Recycle-BC is doubling dipping through lowering single-stream incentives and performance bonuses;

Need to consider mobility or transportation inflation or flexibility to include new mobility costs

There is still an additional cost component for maintenance of automated carts;

There are still significant contract administration costs which include overseeing day-to-day contract operations, processing progress payments, cart management, customer service, addressing collection failures.

It seems by reducing incentive for separate cardboard bins at MFDs is punishing the collectors for decisions that strata councils and property managers make regarding the management of their waste.

Recycle-BC requires advance approval by Recycle BC of a detailed transition plan in order to change recycling container type. Approval will not be reasonably withheld upon receipt of plan. Additionally, you are proposing inclusion of Recycle BC logo on additional collection containers or replacements moving forward. Recycle BC will reserve the right to approve hot-stamps or other design features of collection containers. Our concerns are:

Single-stream municipalities have invested significant money into the cart based system

To change carts would be significant cost implication and may be out of scope with our automated waste collection program.

Carts are typically interchangeable amongst the various streams of waste collected.

The Recycle-BC requirement that they reserve the right to approve hot stamps and design features will have a significant impact on cart management operations and well as increase costs.

What happens if Recycle-BC dissolves?

Recycle BC proposes it will exercise its right to develop a methodology to net out non-packaging and printed paper and commingled glass from calculation of capture rate when calculating applicable bonus payments. Our concerns are:

We are paying for contamination through a separate mechanism in the contract (penalties) which seems that Recycle-BC is doubling dipping.

View this as challenging and difficult to do.

If intention is to use average contamination, this will not work for all loads as each route/area



RECYCLEBC™

April 2018

**Consultation on Revised
Program Plan – Phase I**



Consultations on the Recycle BC Revised Program Plan Questions and Answers, Phase I

| # | Sector | Question | Answer | Reflected in Revised Plan |
|----|------------------|--|---|---------------------------|
| 1. | Local Government | Will the transcript from this webinar be made available to attendees? | The webinar recording and the slides from the webinar are available on this page of the Recycle BC website. | NA |
| 2. | Local Government | Why are you not proposing recovery rates for foam and film? You already have that data available. | What we're proposing for reporting recovery rates on glass, metal, plastic and paper is in line with how these materials are reported by stewards and is in line with what is reported in other Canadian jurisdictions. We believe that moving from reporting overall recovery to this first level of disaggregated categories is a good step and we can at a future time re-evaluate further disaggregation in reporting categories. | Section 5.3 |
| 3. | Local Government | Given that Recycle BC has over 3 years of operating data, why has Recycle BC chosen not to establish a performance target for recovery in this Plan? | The Recycling Regulation sets a performance target for recovery at 75% which Recycle BC has achieved for the past three years. In terms of setting a recovery rate beyond 75%, there are a number of factors to consider. We are still evolving our collection system and continue to add communities to the program. At the same time, we continue to build our producer network as there are still a number of companies that have yet to come into compliance. Given these two important factors we believe it is prudent to continue to work toward the recovery rate as set out in the Regulation. | Appendix B |
| 4. | Local Government | What is the rationale behind the requirement for a community to be | The new Program Plan attempts to provide more clarity on criteria for new communities in the expansion of curbside service. We believe | Section 4.3.2 |



Consultations on the Recycle BC Revised Program Plan Questions and Answers, Phase I

| # | Sector | Question | Answer | Reflected in Revised Plan |
|----|------------------|--|--|---------------------------|
| | | incorporated to be included in the curbside program? | that when setting this criteria it makes sense to require a community to have a defined area for service and from that perspective we are requiring that these communities be incorporated municipalities with a minimum population of 5,000. | |
| 5. | Local Government | Is there any consideration for those municipalities that have curbside garbage pickup prior to 2014 that have a population of less than 5,000 for providing curbside collection where practical? For example, if the municipality is on the thoroughfare of a current Recycle BC collection route? | As you can appreciate we needed to set an eligibility threshold for community size and a population of 5,000 is what was chosen for providing curbside collection. Recycle BC is however interested in working with smaller communities to establish depots. If in the future the population of a community grew to exceed 5,000 then they would be eligible to receive curbside collection and Recycle BC would look at bringing them into the program. | Section 4.3.2 |
| 6. | Local Government | Are existing Recycle BC supported curbside collection programs that do not meet the proposed criteria at risk? | There is no risk to existing collectors who are part of the Recycle BC program despite the changes to our criteria, which applies only to the introduction of <u>new</u> curbside programs. All curbside collectors currently included in the program will have the opportunity to remain. Existing collectors will be offered a contract by the end of the year and unless they decide not to sign the new agreement they will continue to participate with Recycle BC. | Section 4.3.1 |
| 7. | Local Government | I am in a community of only 2,000 people. Will we ever be able to participate in the Recycle BC? | If a community with a population of 2,000 had an existing packaging and paper curbside recycling program in place prior to May 2014, | 4.3.2 |



Consultations on the Recycle BC Revised Program Plan Questions and Answers, Phase I

| # | Sector | Question | Answer | Reflected in Revised Plan |
|-----|------------------|---|---|---------------------------|
| | | | that community would still be eligible to join Recycle BC as a curbside program. If the community did not have curbside recycling in place by May 2014, then they would be eligible to join as a depot location. | |
| 8. | Local Government | I'm looking to implement a curbside collection program in an electoral area of a Regional District with a population of 8,000. There is currently no curbside service for garbage or recycling, this would be a new service. Would we be eligible to join the Recycle BC program? | If you were to implement a curbside recycling program it would not be eligible to join the Recycle BC program. It is not the intent of Recycle BC to limit the ability of a local governments to provide that service, however it does not meet the eligibility requirements we have set for providing that level of service. Having assessed data over the past three years and looked at a variety of factors, we believe that depot collection is a more appropriate and effective method of collection for these communities. | Section 4.3.2 |
| 9. | Local Government | Can you please clarify if municipalities with less than 5000 population had curbside recycling collection prior to 2014 are they still eligible to be a Recycle BC collector? | If municipalities were offering curbside recycling collection as of May 2014, regardless of their population they would be eligible to join the Recycle BC program. | Section 4.3.1 |
| 10. | Local Government | What is the rationale for maintaining the pre-May 2014 collection requirement for program eligibility? If communities have worked hard to build new programs why are they not being given equal consideration for acceptance into the program moving forward? How long will | As you will recall, the Recycle BC program (formerly known as MMBC) launched on May 19, 2014. This is the reason we set May 2014 as the cut-off date for eligibility of current programs. The rationale behind this decision was that we wanted to grandfather existing programs by providing the incentive offer to all | Section 4.3.1 |



Consultations on the Recycle BC Revised Program Plan Questions and Answers, Phase I

| # | Sector | Question | Answer | Reflected in Revised Plan |
|-----|------------------|--|--|---------------------------|
| | | this requirement be maintained, (presumably at least another 5 years) | programs in operation as of May 2014 to ensure there would be no reduction in curbside service compared to what was in place prior to the launch of the program. | |
| 11. | Local Government | The current program has a 3% contamination threshold penalty. Have you considered more of a range with an incentive as contamination rates fall? | At this point in time that is not something we are considering. However, we appreciate the input and it will be included as part of the consultation feedback. We will consider this approach as we move to finalize the new Statements of Work and Master Service Agreements. | NA |
| 12. | Local Government | Are there any plans to work with First Nations collectors within the plan? | There are some First Nation collectors that are already participating in our program. To further enhance our outreach and our work with First Nations, we played a leading role in establishing the First Nations Recycling Initiative. Recycle BC together with eight other stewardship agencies has retained a First Nations individual that works on behalf of all nine agencies to engage with First Nations communities and determine what stewardship programs can be initiated in those communities. That extends beyond packaging and paper to programs such as electronics, tires, appliances, pharmaceuticals etc. We believe this is a great example of stewardship agencies collaborating to provide a one window approach in working with First Nations communities to create a comprehensive recycling solution. | NA |



Consultations on the Recycle BC Revised Program Plan Questions and Answers, Phase I

| # | Sector | Question | Answer | Reflected in Revised Plan |
|-----|------------------|--|---|---------------------------|
| 13. | Local Government | Does RecycleBC have other support materials for local governments to implement supportive policies e.g., purchasing recycled materials to support those markets? | At this point in time Recycle BC does not have those resources but given the increasing interest by local governments in purchasing products with recycled content that is a great idea. There could be some benefit in a procurement guide and it might be an interesting project to work on with interested local communities and could be coordinated through the UBCM. We can all recognize the benefit of increasing the recycled content in the products we purchase in order to help stimulate the market for this material. | NA |
| 14. | Local Government | Will Recycle BC be investigating Parkscape recycling in addition to the work done on Streetscape in the near future? | We consider 'Parkscape' to be included in our streetscape program and as part of the pilot project we placed bins in parks. The results of the pilot project suggest that collection of materials in parks results in a much higher contamination rate than what we see in streetscape bins. Parks will continue to be part of our Streetscape research going forward and we will continue to look at ways in which we can modify the collection in parks to reduce the contamination rate, however, our initial results don't provide a lot of hope for parks as a place where we can collect a clean stream of recyclables. | Section 4.3.6 |
| 15. | Local Government | With all of the data that you will have acquired through your streetscapes pilots, you will be able to determine fairly confidently how much packaging and | The challenge with streetscape is to confirm whether it is a viable collection system for paper and packaging and we are committed to continuing to do the work to determine the | Section 4.3.6 |



Consultations on the Recycle BC Revised Program Plan Questions and Answers, Phase I

| # | Sector | Question | Answer | Reflected in Revised Plan |
|-----|------------------|---|---|---------------------------|
| | | <p>paper is being generated and placed in streetscapes recycling and garbage bins in urban areas. If the offer that you propose for streetscape recycling is not accepted by the municipality, will you offer to fund the disposal of your obligated materials in the garbage stream?</p> | <p>feasibility of streetscape programs. Our requirement under the Recycling Regulation is to ensure that BC residents have reasonable access to collection facilities or collection points for paper and packaging and we believe that by providing a collection network of curbside, multi-family and depot collection systems we are meeting the required accessibility threshold. There is a requirement in the Regulation to provide streetscape recycling and so we are continuing our research but need to remain focused on financing legitimate collection of packaging and paper and not financing a system that is recovering waste materials. We will work with our partners and local governments to conduct further research and see if there is a way that we can actually collect recyclables from streetscape bins. This work will be carried out acknowledging the ever-tightening market for recyclables and stricter contamination levels.</p> | |
| 16. | Local Government | <p>Can you reiterate if Recycle BC has plans to move from single stream to multi-stream collection programs?</p> | <p>There are no plans to move communities from single stream to multi-stream. With respect to single stream and multi-stream programs, as discussed in our consultation workshops in November, for the most part collectors in our multi-stream program are having more success in achieving the contamination threshold while those operating single stream programs with carts for collection are finding it more</p> | NA |



Consultations on the Recycle BC Revised Program Plan Questions and Answers, Phase I

| # | Sector | Question | Answer | Reflected in Revised Plan |
|-----|------------------|---|---|---------------------------|
| | | | challenging. The way we have chosen to address this issue is with our incentive rates which will be discussed further at our future webinar. The current thinking is to increase the differential between the multi-stream and the single stream incentive rates to encourage more collectors to provide multi-stream collection and/or to reward higher performing programs. This approach reflects the fact that the cost of multi-stream programs to Recycle BC is lower due to Lower contamination rates and reduced processing. We would like to reward collectors who have a lower contamination rate and one of the ways of doing that is by offering a much more differentiated incentive rate. | |
| 17. | Local Government | Given the limitation of rural areas under the Recycle BC Plan, (not being included in curbside) would Recycle BC open the program to allow for bulk drop off at depots? Depots have limited effectiveness in rural areas where many residents do not have reliable transportation and distance between depots is far too great for many individuals in rural areas. | At this point in time we would not consider allowing bulk drop-offs. There has been a requirement from the start of the program that depot drop-offs must be done by the resident. What I would suggest is for the Regional District to work with Recycle BC to determine where depots could be established that would allow accessibility by residents for the convenient collection of material. Once depots are established then it is the responsibility of Recycle BC to collect that material from the depot(s) and ensure that it is managed responsibly. | Section 4.3.5 |
| 18. | Local Government | Would you allow depots to limit accepting the amount of packaging and | We are not proposing a limit on the amount of material that depots accept as we want to | Section 4.3.5 |



Consultations on the Recycle BC Revised Program Plan Questions and Answers, Phase I

| # | Sector | Question | Answer | Reflected in Revised Plan |
|-----|------------------|--|--|---------------------------|
| | | <p>paper on each visit? Packaging and paper take much space for depots without much profitability. For example, taking styrofoam or plastic bags is not profitable at all for depot considering labour and space cost.</p> | <p>ensure that the ability to recycle these materials is readily available and convenient for residents. However, in response to feedback we are doing two things to address the concerns of depot operators related to this issue:</p> <ol style="list-style-type: none"> 1) We are working to expand the number of locations that accept that material in an effort to distribute the volume of material across additional drop-off locations. This includes adding 50 London Drug stores as drop-off locations across the province. 2) We have also heard from depot operators that the incentive rates were not high enough for plastic bags and foam packaging and have proposed major increases to the incentive rates for both these materials. <p>We are still reviewing the feedback received from depot operators in order to make a final decision on the applicable incentive rates.</p> | |
| 19. | Local Government | <p>In the prior Recycle BC Plan, producer tonnage was reduced to account for communities that did not wish to participate in the Recycle BC program. In this version of the plan, similar language is not included (or maybe I missed it). Is Recycle BC discontinuing this practice in the recovery rate calculation?</p> | <p>Recycle BC has never discounted producer tonnage based on the number of communities participating in the Recycle BC program. Our recovery rate has always been based on the total material supplied by our producers and the total material collected by our collectors. However, as a point of clarification on deductions by producers, when producers report their materials on an annual basis they are permitted to deduct from their steward reports the tonnage of material that is collected</p> | Appendix A |



Consultations on the Recycle BC Revised Program Plan Questions and Answers, Phase I

| # | Sector | Question | Answer | Reflected in Revised Plan |
|-----|------------------|---|--|---------------------------|
| | | | through the Institutional, Commercial and Industrial (ICI) stream because that is material that is not obligated under the BC Recycling Regulation. | |
| 20. | Local Government | With respect to GHG tracking, further to the previous question on this topic, local governments are currently compiling their 2017 GHG data for reporting to the Province by June 1st. Could you confirm if Recycle BC will be reporting their 2017 GHG emissions, or should local governments who contract with Recycle BC be reporting GHG emissions related to packaging and paper collection in 2017? | Local governments should submit their individual 2017 GHG reports as they have done in the past. In 2018, Recycle BC will share the reporting model it is developing which will require local governments to provide Recycle BC with their 2019 GHG data which will be part of the GHG report Recycle BC submits to the government in 2020. | Section 5.3 |
| 21. | Local Government | Are there any plans to share information related to the range of collection services (e.g. manual, automated) that impact contamination to assist local government in decisions around future services? | The pre-consultation workbook that we supplied in October provided an overview of the contamination levels for the different types of collection services. I would encourage you to review this and if you require more information please contact Jordan Best our Director of Collection who would be happy to discuss this further. You can reach Jordan at: jbest@recyclebc.ca or 778-588-9510. | NA |
| 22. | Local Government | How will Recycle BC collect residential packaging and paper, such as yogurt cups, that is dropped off at residents' workplaces? | Any material that is disposed of in a commercial enterprise, even if brought from home to a place of work, is outside the scope of the Recycle BC program. That material would be managed through the Institutional, Commercial and Industrial (ICI) system. | Sections 3.1 and 3.3 |



Consultations on the Recycle BC Revised Program Plan Questions and Answers, Phase I

| # | Sector | Question | Answer | Reflected in Revised Plan |
|-----|------------------|--|---|---------------------------|
| 23. | Local Government | Is there any interest in allowing commercial entities, for instance fast food restaurants that generate high levels of packaging, to channel these materials into the Recycle BC collection system which were deposited on their premises? | The material generated at commercial locations such as quick service restaurants falls outside of the parameters of the Recycle BC program and is managed through the ICI channel. | Section 3.3 |
| 24. | Local Government | What's the timeline to begin including commercial packaging and paper into the Recycle BC program or is something dictated by the MOE only | Any decisions regarding the collection of paper and packaging from the commercial sector would be under the purview of the Ministry of Environment. It is not currently obligated material under the Recycling Regulation. | Section 3.3 |
| 25. | Local Government | Will Recycle BC give future consideration to allow commercially sourced materials to be processed through your network at the commercial generators cost to take advantage of your economy of scale and encourage higher recycling rates? | Recycle BC is always open to discussions on working with organizations to explore the opportunities to increase the recycling rate in the province of British Columbia. I'm not sure that we would be able to provide the cost savings you expect but we are definitely open to the conversation. | Section 3.3 |
| 26. | Local Government | Does Recycle BC have funding available for local governments to conduct waste composition studies at landfills? | Recycle BC does not provide funding for audits undertaken by local governments. As you know Recycle BC conducts its own audits and shares the results of those audits with the communities. If you would prefer to accompany Recycle BC to a facility that is undergoing an audit our field staff will arrange a visit with you so that you can see the material that is being collected from your community. | NA |
| 27. | Local Government | Can you talk more about establishing partnerships with larger retailers, like | Recycle BC has created a framework for establishing partnerships with retailers to | NA |



Consultations on the Recycle BC Revised Program Plan Questions and Answers, Phase I

| # | Sector | Question | Answer | Reflected in Revised Plan |
|-----|------------------|---|---|---------------------------|
| | | London Drugs as drop-off locations for material? | collect materials on behalf of Recycle BC. Now that a framework is in place we are happy to have discussions with any retailer interested in exploring that opportunity. | |
| 28. | Local Government | Recycle BC recently asked municipalities to resubmit their costs for operation of packaging and paper recycling at curbside, multi-family and in depots. This was a 'refresh' of the data that was compiled to determine a market clearing offer at the onset of the program in 2014. Why did Recycle BC not also request that their auditor be provided with the costs for streetscape collection in order to determine a fair offer to municipalities for these services in the future? How will Recycle BC determine the offer for streetscapes? | The intent of the request for the costs of operation of curbside, multi-family and depot services was to ensure that when we finalize the incentive rates for curbside and multi-family services that we have the most recent and up-to-date information. We did not include streetscape in that request because we are still working through the feasibility of providing streetscape recycling services. The pressure that has emerged on end-markets makes this work even more important and so we are not yet at the point of requiring streetscape cost data from local governments. | NA |
| 29. | Local Government | Have there been many communities that have changed to accept multi-family (5 or more units) recycling and how did they change to include these in a single stream collection? | There are many communities with multi-family buildings providing single stream service. There are also many communities providing multi-stream service to multi-family buildings – either of these services can be provided very successfully. If a community that is currently offering curbside collection needs assistance in incorporating multi-family buildings we would be pleased to speak with you about that. | NA |

| # | Sector | Question | Answer | Reflected in Revised Plan |
|-----|------------------|--|--|---------------------------|
| 30. | Local Government | Do you use community-based social marketing when developing communications campaigns? | Yes, all the communication campaigns we undertake utilize social channels. We do regional and province-wide campaigns aimed at improving recycling habits. We are happy to make our communication campaign assets available to communities if they want to undertake communications at a local level. We are also happy to work with individual communities to address a specific issue. We also have a Community Champions program, where we provide grants to community-based organizations focused on recycling promotion and education. | Section 4.7 |
| 31. | Local Government | What categories in your fee schedule do compostable or biodegradable packaging fit into, do producers pay fees on these products also, even though it is also not accepted on the collection side? Understanding that these materials can be a contaminant in the recycling program, but are also considered a contaminate in most composting streams, would Recycle BC consider collecting these materials as a separate stream at depots in order to properly manage this growing packaging trend? | Members pay fees on all materials supplied to consumers regardless of how it is managed through the recycling, waste or organics stream. Material that is compostable or biodegradable would likely fall within the plastics or paper categories in terms of a fee rate on those materials. As part of the current program plan, we are going to undertake a material audit of the organics stream, where organics are collected as a separate stream through curbside collection in order to gain an understanding of the composition of the organics bin. This will help us understand the proportion of packaging and paper in the organics stream, and within that, the amount that should have been placed in the recycling stream. We are currently in the preliminary stages of deciding the specifics of | NA |



Consultations on the Recycle BC Revised Program Plan Questions and Answers, Phase I

| # | Sector | Question | Answer | Reflected in Revised Plan |
|-----|------------------|--|---|---------------------------|
| | | | this audit and will review the findings in order to determine next steps. | |
| 32. | Local Government | Every other stewardship program in BC is subject to global commodity prices, and most are managing materials much more difficult to deal with such as hazardous substances. None of these programs have limited their offerings to BC residents based on these challenges such as you are suggesting with the Streetscape collection program. Why is Recycle BC different? | Recycle BC offers three streams of service, many of them offered in each community and we are adding more communities all the time. It is however important to remember that our mandate is to collect packaging and paper materials and we continue to do the work necessary to determine the best ways of collecting this material. When it comes to streetscape collection – we need to determine if it is the bins that are resulting in high contamination or is streetscape collection just not an appropriate way to collect recyclables. Recycle BC is committed to continuing the work to determine the best channels for collecting packaging and paper materials which are the obligated materials under the Recycle BC program. | NA |
| 33. | Local Government | With the uncertainty in recycling end markets, has Recycle BC considered reduction targets for material groups, similar to what Manitoba did for bags, or promotion and education efforts aimed at, for example coffee cup use, so that less of this material is produced in the first place? | For clarification, the reduction target for plastic bags in Manitoba was included in the Regulation not the Program Plan. Reduction targets for specific materials are not part of the BC Recycling Regulation and for that reason they are not part of the Recycle BC Program Plan. Recycle BC's approach to reduction has been to undertake effective consumer-focused promotion and education campaigns targeting certain materials to reduce the generation of specific materials in the system. Most recently | Appendix B |



Consultations on the Recycle BC Revised Program Plan Questions and Answers, Phase I

| # | Sector | Question | Answer | Reflected in Revised Plan |
|-----|------------------|---|--|---------------------------|
| | | | we have initiated a campaign for single-use bag reduction encouraging consumers to forego the use of single-use bags in favour of reusable bags. There is also the work of our members who are continually innovating in order to reduce the materials they supply to consumers. | |
| 34. | Local Government | Is Recycle BC going to be involved with developing or working with industry/processors to establish local end-markets in North America, given the restrictions from China? | Please be aware that all the plastics collected in the Recycle BC program are recycled locally in British Columbia through Merlin Plastics. With respect to mixed paper and cardboard, there is a degree of uncertainty right now about the long-term intentions of the Chinese market for these materials resulting in a reluctance to invest heavily in the creation of domestic processors for this material. Given that building, re-opening or retrofitting a paper mill requires a significant investment, we along with other recyclers find ourselves in a holding pattern while we see how this situation unfolds. That being said, Recycle BC always prioritizes domestic markets for its materials. | NA |
| 35. | Local Government | Regarding the recovery rate, is the 75% the target or are you proposing not to set a target? | 75% is the target. | Appendix B |
| 36. | Local Government | In the previous plan, some details like accessibility and recovery rate targets were included in the body of the plan. In this plan they are included in the appendix only. | As this is the second 5-year plan, all the start-up language was removed and all the reporting requirements are included in Appendix B which we consider an integral part of the plan. | Appendix B |



Consultations on the Recycle BC Revised Program Plan Questions and Answers, Phase I

| # | Sector | Question | Answer | Reflected in Revised Plan |
|-----|------------------|--|--|---------------------------|
| 37. | Local Government | This plan appears to have less detail than the previous plan. Was that deliberate? | In the original plan there was a lot of additional detail provided because we didn't know if we would be able to meet targets. With the track record over the last four years delivering and operating the recycling system we didn't feel having that level of detail was required. | NA |
| 38. | Local Government | Regarding Streetscape, there seems to be a philosophical difference between the local government perspective and Recycle BC's perspective about how it could be implemented. We understand there has been a change in end-markets that have added an additional level of complexity and uncertainty. Can you give an update on recent thoughts on how Streetscape might work | Recycle BC's concerns remain the same as outlined in the plan: contamination levels are high and marketing materials with a 30% contamination rate is extremely difficult. We don't yet have proof of concept on a streetscape system that delivers low contamination rates, so we may not be able to recycle that material. It's difficult to justify rolling out a program that collects material that can't be recycled, and that doesn't align with our stewards obligations. The quality of material is also declining over time. | Section 4.3.6 |
| 39. | Local Government | We understand that the ability to market materials is a challenge. Is there more information that should be in the plan to put more onus on producers to help develop markets or create more local capacity? | We do currently work with producers on a number of projects, but regarding fibre markets it's more of a challenge because of the level of capital investment required. There is also uncertainty with the length of time China's policy will remain in effect, so businesses are unwilling to make that large of an investment without long-term certainty. We don't plan to remove any materials and we've added the collection of Other Flexible Plastic Packaging. | NA |



Consultations on the Recycle BC Revised Program Plan Questions and Answers, Phase I

| # | Sector | Question | Answer | Reflected in Revised Plan |
|-----|------------------|---|---|---------------------------|
| 40. | Local Government | You have control over all the fibre coming from around the province. Is there opportunity for a long-term investment or contract with a producer that would allow Recycle BC to be removed from the global market conditions? | Creating a local paper end-market is a significant investment which may not be realistic in today's environment. We do work with producers currently to use recycled content from our program and can continue to pursue opportunities for companies to use our paper as recycled content, but it will take time and packaging changes have long gestation periods so that type of change doesn't happen quickly. | NA |
| 41. | Local Government | While you are able to continue to market your curbside and multi-family fibre, with the high contamination in the streetscape fibre, has there been any consideration given to composting that material. | We are open to composting and have looked into it for fibre that has moisture content so high it can't be recovered. | Section 4.3.6 |
| 42. | Local Government | In your plan it indicates producers pay fees regardless of if the material is getting recycled or not. Is that money going into research and development? Should the plan reflect more how that money is being used? | The Other Flexible Plastic Packaging is an example of trying to move material out of the municipal waste stream. We are trying to reinforce in the plan that whether producers' material is recyclable or not, all producers pay a portion of the cost of the system. | Section 4.9 |
| 43. | Local Government | Would you consider defining non-recyclable packaging and paper better for producers and reporting packaging that can't be recycled as disposal to help measure the efforts producers are making to reduce non-recyclable packaging? | We don't know what happens to it if it doesn't end up back in our stream collected, so we couldn't accurately report as disposal as it would be based on assumptions. We are required to report all packaging supplied and collected. | NA |



Consultations on the Recycle BC Revised Program Plan Questions and Answers, Phase I

| # | Sector | Question | Answer | Reflected in Revised Plan |
|-----|------------------|--|--|---------------------------|
| 44. | Local Government | Could Recycle BC report on what portion of all obligated material is collected at 1) curbside/multi-family 2) depot 3) not collected at all as a performance measure with an intent to have producers' material all be recyclable over time? | Many producers, in order to do something to affect amount of material supplied, reduce the packaging weight overall. That's led to an increase in Other Flexible Plastic Packaging, which achieves reduction in packaging and is a material we're starting to collect at our depots for research and development. | Section 5.1 |
| 45. | Local Government | In the plan it notes one of the criteria in order for municipalities to turn recycling collection services over to Recycle BC is that the packaging and paper curbside program achieved a minimum capture rate of 90 kilograms of packaging and paper per curbside household in the previous calendar year. Is there a rationale for that? | Typically programs below that threshold are very low density, rural locations where, from our perspective, a depot model may make more sense to service a broader segment of the community, including those residents who may fall outside the curbside service area. | Section 4.3.3 |
| 46. | Local Government | Is it not appropriate in the plan to have clear entry criteria for depots and multi-family collectors to join the Recycle BC program, like there is clear criteria for joining as a curbside collector? | We are looking to bring multi-family in as part of an annual review as an ongoing item. For depot, we look at how many depots we have in a service area/location to ensure adequate service/access. | Sections 4.3.7 and 4.3.8 |
| 47. | Local Government | Is the Accessibility Performance of multi-family household units (421,600) what you currently service and the minimum target moving forward over the next five years? Could it be a more ambitious target? | The way the multi-family model is structured, if collectors want to participate, we will provide an incentive. But there are collectors who do not want to participate in the program. In late 2018, Recycle BC will be conducting an analysis of multi-family gaps in our program and will provide offers as part of this review process. | Appendix B |



Consultations on the Recycle BC Revised Program Plan Questions and Answers, Phase I

| # | Sector | Question | Answer | Reflected in Revised Plan |
|-----|---|---|--|---------------------------|
| 48. | Local Government | There is a cost associated with contamination reduction for local governments. Could Recycle BC do more to support contamination reduction? | Yes, we are developing campaign materials that can be used by municipalities to address contamination, specifically plastic bags, which is our biggest contaminant, and we're open to working with local governments to reduce contamination. | NA |
| 49. | Environmental Non-Governmental Organization | What is the defined timeframe for producers improving packaging? | There is no specific timeframe in the regulation for producers to improve their packaging however we are seeing a lot of innovation taking place by producers who are increasingly designing for recyclability. In addition, there is a significant amount of work taking place by producers at a global level to make all their packaging either reusable, recyclable or compostable by 2025 and we are seeing the benefits of these global commitments locally as well. We will be participating in the next Ellen MacArthur new plastic economy meeting in May and benefit from being part of those discussions. You should also be aware of a number of pilot projects that are currently underway some of which are designed to support producers who are making changes to their packaging and working with them to ensure it will flow more easily through the recycling system. I am encouraged as I see a lot of activity and work in this space. | Appendix B |
| 50. | Environmental Non-Governmental Organization | What is the fee structure for non-recyclable materials vs. recyclable materials? How much disincentive is | The material fee rates are designed to allocate costs to materials based on a number of factors including: how much it costs to operate the | NA |



Consultations on the Recycle BC Revised Program Plan Questions and Answers, Phase I

| # | Sector | Question | Answer | Reflected in Revised Plan |
|-----|---|---|--|---------------------------|
| | | there to produce non-recyclable packaging? Seems like this is where Recycle BC could have a big impact on the packaging that is produced. | overall recycling system, how easily or difficult those materials are managed through the system and thirdly, whether those materials attract any commodity revenue. Materials that are not currently managed through the recycling stream still pay fees and are assigned an additional cost which is directed at undertaking the research and development work necessary to overcome the current obstacles to managing that material through the recycling stream. | |
| 51. | Environmental Non-Governmental Organization | Won't collecting multi laminates to burn them conflict with the plan to redesign packaging to be reusable/recyclable/compostable and also risk declining public support and faith in recycling programs? It also conflicts with the commitment MMBC made to not burn materials. | Recycle BC made a commitment in the original program plan to begin collecting all materials by the end of the original Program Plan. For this reason we have initiated the pilot on plastic laminates coupled with research and development in order to determine feasibility of recycling this material and if it can be processed in such a way to meet the specifications of industrial customers who, if they were not using these energy pellets, would be using more carbon intensive fuels such as coal and diesel. We believe this initiative meets the requirements of the program plan to collect this material responsibly and relieve municipalities' responsibility of managing this material through landfill. | Section 5.2 |
| 52. | Stewardship Org | In your existing curbside program slide can you explain the second bullet as I don't understand what you mean by | We are always trying to balance the onboarding of new communities while we work with the government to achieve greater producer | NA |



Consultations on the Recycle BC Revised Program Plan Questions and Answers, Phase I

| # | Sector | Question | Answer | Reflected in Revised Plan |
|-----|---|---|--|---------------------------|
| | | adding eligible curbside as soon as possible from a financial perspective? | compliance. Each year we review our budget with a view to adding new communities to ensure we have the resources to commit to providing service to that community for a minimum of five years. The reference to adding communities as is possible from a financial perspective, refers to striking the appropriate balance between the revenues from steward fees and the number of communities we can support. | |
| 53. | Environmental Non-Governmental Organization | With respect to GHG tracking, will Recycle BC be taking responsibility and reporting all GHG emissions, i.e. collection, processing and transportation to lower mainland? Can you tell us if there is any intention to identify system emissions as local government emissions? | Recycle BC will be reporting greenhouse gases across our entire supply chain and that includes collection, haulage and processing. Since it will be a Recycle BC total system report, local governments who are part of the program will be asked to provide some contributions to that report from a local level which will allow us to calculate the total system GHG impact. At this point, the model is not yet adequately finalized with respect to specifics on the local government emissions but our GHG report will account for Recycle BC's province-wide total supply chain. Recycle BC will share the reporting model it has developed with local governments this year and will ask that they provide their 2019 GHG data to us, which in turn will constitute part of the GHG report Recycle BC must submit to the government in 2020. | Section 5.3 |



Consultations on the Recycle BC Revised Program Plan Questions and Answers, Phase I

| # | Sector | Question | Answer | Reflected in Revised Plan |
|-----|---|---|---|---------------------------|
| 54. | Environmental Non-Governmental Organization | We were under the impression that our input from the November Consultation would be reflected in the new plan. It appears that the issues raised in the consultation session have not been addressed in the plan. For example, depot re-categorization to category 3. | <p>During the consultations in the Fall, Recycle BC proposed an approach whereby Recycle BC would no longer provide incentives to local governments for paper, cardboard and containers collected at their depots where all or a significant majority of those customers have access to curbside or multi-family recycling that accepts unlimited volumes of those same materials directly at their home. The rationale behind this proposal is we do not want to double-pay for both depot collection and curbside collection of the same material. Under that proposed approach, we would continue to support the depot collection of materials not collected at curbside such as plastic bags and glass.</p> <p>These types of specifics are not addressed in the program plan but would be addressed in the new Statements of Work. There is no final decision on this yet as we are still reviewing the feedback received and conducting interviews at a number of depots to determine why residents are taking materials accepted in curbside and multi-family collection to the depot. The consultation feedback and the surveys will further inform a decision on this.</p> | Section 4.3.5 |
| 55. | Environmental Non-Governmental Organization | There is a lower incentive for single stream collection but all collection methods face the same contamination scrutiny/fines. Why not have all | The feedback received from collectors is that they are looking for consistency and predictability in terms of the incentive rate. The incentive rate was designed from the beginning | Section 4.3 |



Consultations on the Recycle BC Revised Program Plan Questions and Answers, Phase I

| # | Sector | Question | Answer | Reflected in Revised Plan |
|-----|---|--|--|---------------------------|
| | | collection methods pay the same incentives and then charge a fine if your load is contaminated? | to incentivize collectors to use a collection method that will reduce contamination which leads to a lower processing cost. We have also designed the incentive rate to be as administratively simple as possible and believe that we have struck that balance. | |
| 56. | Environmental Non-Governmental Organization | Why is Recycle BC not paying the full costs to deliver services instead of just offering incentives? If it costs more in a certain area to deliver the service, should Recycle BC not be meeting its obligations under the Recycling Regulation? | We conducted research in 2013 to look at the actual cost of providing recycling services in approximately 26 local governments in BC and we are in the early planning stages of running that research again. One of the findings of the 2013 research was that there is a significant range of costs between different communities making it very difficult to establish a benchmark cost for collection. The incentive approach to compensating local governments is two-fold: it provides a level playing field in terms of providing all communities with the same incentives while allowing for some differences particularly for community size and density. The second factor in this approach is that Recycle BC has absorbed all the transportation costs associated with the program which for some communities, particularly collectors outside the Lower Mainland and the Southern Vancouver Island, was the largest component of their costs in providing recycling services. So, we have confidence that this two-fold approach of an incentive price plus covering the | Section 4.3 |

| # | Sector | Question | Answer | Reflected in Revised Plan |
|-----|-----------------------|--|--|----------------------------|
| | | | transportation, processing and sorting costs is a reasonable compensation model. | |
| 57. | Steward | Will China's restrictions cause the steward fees to increase? | There is no doubt that the restrictions imposed by China on the materials they will accept is having a significant impact on the commodity prices of many materials, particularly in Recycle BC's case for paper. For example, the commodity price for recycled cardboard has been cut in half over the last year. Mixed paper is another example of material that has been significantly impacted with the average price received for mixed paper dropping from \$80.00/tonne to recyclers paying \$15.00/ tonne to have the material taken. As you know the 2018 fees were announced in the Fall of 2017 and those fee rates will not change in 2018, but there may be changes to fees next year | N/A |
| 58. | Packaging Association | While the decision to begin reporting on recovery based on broad categories (paper, plastics, glass, metal) is an improvement from the current situation, it is not consistent with other Canadian programs (Ontario, Manitoba, and Quebec), who have provided the much-needed disaggregated performance (by individual materials) from their onset. Given that Recycle BC uses the material-specific recovery rates to set fees, why not make those public? | Providing recovery rates based on the four material categories of paper, plastic, glass and metal is a practical first step in beginning to provide more detailed reporting for the materials collected. Based on the results of the first disaggregation, we will look at whether it's appropriate to provide further detailed recovery rate information. | Section 5.3 and Appendix B |



Consultations on the Recycle BC Revised Program Plan Questions and Answers, Phase I

| # | Sector | Question | Answer | Reflected in Revised Plan |
|-----|---------|---|--|---------------------------|
| 59. | Steward | Is Alibaba remitting fees on their packaging coming into BC? | Alibaba is not a registered member of Recycle BC. We will follow up with our steward services team to determine if they are already identified as a prospective steward. We are continually working to identify other businesses that are resident in BC and supplying obligated materials to BC consumers and should be part of the Recycle BC program. To review the list of Recycle BC members please click here . The list is updated early each year. | Appendix D |
| 60. | Steward | To follow up on the Alibaba question. We know Amazon has warehouses in all provinces including BC. We know they sell a lot to consumers and most of the recycling bins in our provinces are filled with packaging from Amazon. It's affecting the fee that everyone else has to pay. Is there anything being done to combat Amazon not paying fees and effecting everyone else's costs? | Amazon is a member of Recycle BC and they have been paying fees to the program since 2014. We are continually working to identify other businesses that are resident in BC and supplying obligated materials to BC consumers and should be part of the Recycle BC program. To review the list of Recycle BC members please click here . The list is updated early each year. | Appendix D |
| 61. | Steward | What is the point of the upcoming GHG report? | When the province transitioned the recycling program over to industry they also transferred the responsibility for reporting the greenhouse gas emissions associated with providing residential recycling services to residents of BC. This is a requirement in the Recycling Regulation. During this transition period, local governments will submit their 2017 GHG reports to the ministry as they have done in the past. In 2018, Recycle BC will share the | Section 5.3 |



Consultations on the Recycle BC Revised Program Plan Questions and Answers, Phase I

| # | Sector | Question | Answer | Reflected in Revised Plan |
|-----|---------|---|---|---------------------------|
| | | | reporting model it has developed which will require local governments to provide us with their 2019 GHG data which will be part of our the GHG report to Recycle BC submits to the government in 2020. Going forward, Recycle BC is responsible. | |
| 62. | Steward | What work is being done to help inform and educate consumers on contamination and how to prevent it and recycle effectively? | There is a lot of work underway to raise awareness with consumers of what does and does not belong in their recycling bin. Recycle BC has created a number of campaigns through social media channels aimed at educating consumers on contamination. There is also a lot of work being undertaken by collectors who are communicating directly with residents when they see contamination in the recycling bin. They are able to leave notes and educate residents on materials they find in the bin that don't belong. | Section 4.7 |
| 63. | Steward | We know from our customers that convenience is key to getting materials and packaging back, will you be expanding or adding more return to retail programs to gather more soft plastic and foam from consumers? | We recognize that convenience is very important for residents and the London Drug drop off sites provide that convenience for many consumers. We are open to other retailers who might be interested in offering a similar service, on behalf of Recycle BC, for the collection of specific materials and have developed a framework for these types of partnerships. We believe that these retail drop-off locations can be a good compliment to the current network of 200 plus depots plus the 50 | NA |

| # | Sector | Question | Answer | Reflected in Revised Plan |
|-----|---------|---|---|---------------------------|
| | | | London Drugs locations across the province collecting specific materials. | |
| 64. | Steward | We are changing some of our packaging to be more environmentally friendly but since the categories of plastic are not separated, the fees for those materials are lumped in with other plastics. Is there any plan to separate them and charge a lower fee as incentive to the manufacturer to start using more environmentally friendly materials? | We are involved in a project currently underway being led by Canadian Stewardship Services Alliance called the Material Cost Differentiation Project (MCD). This project is, amongst other things, looking at whether the material categories need to be further disaggregated to better reflect the different ways in which specific materials flow through the recycling system. That project is currently underway and we will update stewards on the findings of the project when we have some results to share. | NA |
| 65. | Steward | Are there any changes to the reporting for Stewardship and CSSA? | There are no changes to steward reporting using the WeRecycle Portal in 2018 unless you are impacted by the 2017 amendments to the BC Recycling Regulation. The amendments made last year clarified the definition of obligated materials within the paper category. If that is a product category in which you report there is an expanded definition of obligated paper which now includes paper of any description including flyers, brochures, booklets, catalogues, telephone directories, newspapers, magazines, paper fibre and paper used for copying, writing or any other general use. If you report material in the paper category are unclear of your reporting obligations please contact Steward Services at 1-888-980-9549 or by email at stewards@recyclebc.ca . | Section 3.2 |



Consultations on the Recycle BC Revised Program Plan Questions and Answers, Phase I

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| 66. | Steward | In regards to changes in reporting of printed and paper products, we are unclear on how this will affect our blank artist sketchbooks which is about 20% of our business. Based on the input from Recycle BC (MMBC) when we originally set up our program, we submit recycling fees on all packaging involved with sketchbooks, but when it comes to determined sketchbooks we haven't submitted fees for the blank paper inside these. We essentially have 2 levels of sketchbooks; student/school level which is recycled at the end of term (and we do submit paper fees on these items) and Artist level which is kept for long term keepsake/inspiration (which we currently don't submit). With the changes, can you clarify if we are now required to submit fees on all levels of sketchbooks? If not able to do at this time, can you have someone follow up with me after this webinar? | Based on the definition of obligated materials in the updated Recycling Regulation, if you sell sketch books to consumers you are required to pay fees on both types of sketchbooks, those sold to students and those sold to artists. If the sketchbooks are sold in any other primary packaging or overwrap, that packaging material should be included in your steward report as well. If you want further clarification, please contact our steward services team at stewards@recyclebc.ca . | Section 3.2 |
| 67. | Steward | Would you not consider (in the absence of downstream markets for film) that Energy from Waste provides the same benefits for clear bags just mentioned for multi laminates? | We have looked at the fuel pellets as an option for the management of a limited number of obligated materials in order to meet the commitments under our program plan. With respect to the blue bags for collection, they are not an obligated material because they are a product as distinct from packaging. They are, | NA |



Consultations on the Recycle BC Revised Program Plan Questions and Answers, Phase I

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| | | | however, being used on a discretionary basis by our collectors. As previously discussed, our processors have indicated that there is limited ability to recycle these bags and so as we standardize our system, it is preferable to move to reusable collection containers rather than look for a solution for a material which is not obligated under the Recycle BC program. | |
| 68. | Steward | As past studies and resources presented (Nov 2017) illustrated higher diversion (net of contamination) with the utilization of “see through” blue bags over other systems (especially carts), do you not consider it more beneficial to maintain this option and further explore down stream markets (film), rather than force conversion from existing program(s). The blue bag (film) component of the film stream is a small portion when compared to the other film (grocery carry out sacks) in the mix. Why not allow the “blue bag as a collection mechanism but proceed with banning of grocery sacks? Cost efficiency for stewards and environmental benefits for municipalities are being impacted with the exclusion of the blue bag option. | The feedback we have received from our processors is that a very small proportion of the blue bags are being recycled. This has informed our proposal to remove single use blue bags as collection containers by July 1, 2020 and ask collectors to transition to reusable containers by that date. Additionally, we feel strongly that this is the right decision from an environmental perspective as we try to create a closed-loop sustainable system for the materials collected. It's important to note that none of the highest performing curbside programs (kg collected per household per year, net of contamination) in BC currently utilize single use blue bags as collection containers. The suggestion that these bags produce higher diversion rates compared to other container types is not borne out in BC. | NA |
| 69. | Steward | Interest remains strong from numerous communities to continue to allow | The type of collection container used for the collection of recyclables falls under the purview | NA |



Consultations on the Recycle BC Revised Program Plan Questions and Answers, Phase I

| # | Sector | Question | Answer | Reflected in Revised Plan |
|-----|---------|--|--|---------------------------|
| | | residents the opportunity to use “see through” blue bags. These comments were also raised during the Fall consultations. We are not seeing this option being sustained. Is this something that will be discussed as part of the June / July Statement of Work discussions? | of the Statement of Work and Master Services Agreement. It remains Recycle BC’s intention to initiate a phase-out of the use of blue bags. Our rationale, as we discussed at the consultation, is that our analysis indicates that these bags are not recycled and given that Recycle BC is a recycling and sustainability organization our preference is to move away from single-use collection containers. | |
| 70. | Steward | You had previously mentioned on the call that producers are required to eliminate certain packaging materials by a certain timeline. Could you elaborate? | It was not my intention to state that producers are being required to eliminate certain packaging materials. Rather, some companies have made voluntary long-term commitments around the recyclability of their packaging materials and information about these initiatives is provided in our Annual Report each year. That said, these measures are not required by the BC Recycling Regulation, nor are they a requirement of Recycle BC’s Program Plan. | Section 5.2 |
| 71. | Steward | You said Recycle BC has been or will be working with suppliers on refining packaging materials. Can you share any successes out of that thus far (if applicable)? Also, do you plan to create awareness campaigns to communicate those innovations/changes? | We have worked with some members to determine if packaging changes they have made or intend to make will be acceptable within the Recycle BC collection system. In addition, we have a pilot that will launch shortly working with a group of producers focused on a specific packaging type that currently has a high residue rate. The intent of the pilot is to determine if there is an opportunity to more effectively communicate with consumers the need to | Section 5.2 |



RECYCLEBC™

Consultations on the Recycle BC Revised Program Plan Questions and Answers, Phase I

| # | Sector | Question | Answer | Reflected in Revised Plan |
|---|--------|----------|--|---------------------------|
| | | | reduce product residue so that the material can be successfully recycled. We believe that Recycle BC has a unique opportunity to undertake projects such as this with producers and provide them with real-world conditions to determine compatibility of their packaging in the recycling system. | |



BC Indigenous Solid Waste Technical Advisory Group

May 13, 2018

Recycle BC,
230-171 Esplanade West
North Vancouver, BC

Via email: consultations@recyclebc.ca

Dear Sir or Madam:

Re: Packaging and Paper Product Extended Producer Responsibility Plan

We are pleased to advise Recycle BC of the formation of the B.C. Indigenous Solid Waste Technical Advisory Group (ISWTAG). A key objective of the group is to support recycling services in BC First Nations communities. To that end, we are in support of EPR plans that will result in timely services to all BC First Nations within the 5-year time frame of the plan. Conversely, we do not support EPR plans that exclude BC First Nations or that limit or lower the standard of services based on the location or the size of the community.

We note that the proposed plan contains language which excludes First Nations from eligibility for certain services, and lacks specifics with regard to improving the rate of service provision to First Nations communities.

We would be interested in plan amendments to address these issues, and look forward to a positive working relationship with Recycle BC.

Respectfully,

Leo Lawson
Co-Chair

Calvin Jameson
Co-Chair

Cc: Bob McDonald, Director, Extended Producer Responsibility, BC Ministry of Environment
(Bob.McDonald@gov.bc.ca)

Cc: Ananthan Suppiah, Manager, Specialist Services, Indigenous Services Canada, BC Region
(Ananthan.Suppiah@canada.ca)



BC Bottle and Recycling Depot Association
#33030, 11198 84th Avenue,
Delta, BC, V4C 8E6
Phone: 604-930-0003 Fax: 604-930-0060
Email bcbda@telus.net

May 14th 2018

RecycleBC
230 - 171 Esplanade West
North Vancouver BC,

Stakeholder comments on the proposed RecycleBC 2018 program renewal

After review of the proposed RecycleBC program renewal document, it remains clear to the BCBRDA that substantial issues regarding fair payment for service, lack of a negotiated or transparent auditing process, lack of a negotiated dispute resolution or lack thereof of any dispute resolution in some contracts and the continued confusion over the distinction of residential over ICI materials remain unresolved.

The BCBRDA receives ongoing complaints from collectors (BCBRDA members and non members) who believe that the dismal level of pay for work performed and the cost in man hours to review and reconcile invoices that outweighs any payment that might be owed and the ongoing audits that claw back revenues each month make this program unattractive as it stands.

The BCBRDA attended the November 2017 consultations in New Westminster and at no point was there any discussion about the methodology used to calculate handling fees for collectors or other service providers nor was there any negotiation regarding handling fees at that time or any other. Participants were only asked to submit a wish list of their concerns. The BCBRDA does not believe the November workshop qualified as proper contract review. In addition there is no methodology or trigger included in the new plan to address increases to collection costs over the period of the contract.

The lack of an effective dispute resolution also remains an issue of immediate concern. As RecycleBC is aware, one of our members had their contract cancelled by RecycleBC after substantial investments were made to qualify as a collector and the depot operator was denied any dispute resolution. Some other depots have chosen to cancel their RecycleBC contract out of frustration resulting from prolonged unresolved issues.

The BC Ministry of Environment recently released an EPR program guidance document that states producers must pay the real cost of collection of their materials and provide a fair dispute resolution process. It is our opinion that neither of these issues have been adequately addressed in this renewal document nor has there been any attention been given to the current non-negotiated audit process.

The commercial arbitration act as a recommended method of dispute resolution between parties that differ so greatly in financial resources is not an effective solution.

As mentioned in our previous letter to RecycleBC, the BCBRDA would be willing to participate in a process to develop a handling fee methodology to determine adequate handling fees and to negotiate a fair audit process and dispute resolution.

Yours truly
Corinne Atwood
Executive Director
BC Bottle and Recycling Depot Association

CC Ministry of Environment
Interested parties



Monday, May 14th 2018

Recycle BC
230-171 Esplanade West
North Vancouver, BC V7M 3J9

To Whom It May Concern:

Thank you for the opportunity to submit comments on Recycle BC's Packaging and Paper Product Extended Producer Responsibility Plan which, once in effect, will replace the plan submitted by Multi-Material BC (now Recycle BC) and approved in April 2013.

Carton Council Canada (CCC) wishes to extend its congratulations to Recycle BC for its five-year anniversary of operating a very successful residential packaging and printed paper recycling program in British Columbia. Generally speaking, CCC supports the proposed plan, with one notable exception pertaining to program performance reporting.

As you know, the mission of the Carton Council of Canada is to deliver long-term collaborative solutions with multiple stakeholders in the value-chain in order to divert cartons from disposal. In order to measure our progress, we rely on the publicly available information provided by the deposit and multi-material stewardship agencies in each Canadian jurisdiction. In the case of British Columbia, we had hoped to see a notable increase in the recovery of dairy and dairy substitute cartons in particular, which were previously collected under the voluntary program run by the Dairy Council of BC and achieving a recovery rate of about 16%.

We put forward our request for material-specific recovery rate information at Recycle BC's one-year anniversary mark, and conveyed it via our participation in Recycle BC's two-day consultation held in November, 2017. It is also captured in the Consultation Report published February 28th 2018¹.

RecycleBC's lack of transparency on material-specific recovery rates is difficult to understand, given that: i) other agencies across the country (Stewardship Ontario, MMSM, and EEQ) make this information public; ii) Recycle BC relies on this information to set material-specific fee rates via the Pay-In-Model; and iii) Recycle BC now has five years of operational experience in hand, and should therefore be in a position to effectively track this metric.

¹ As indicated on p. 7 of the report, under the heading Packaging Design & Recovery Rates: "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". This statement received several votes of agreement at the consultation session and it was a repeated comment and/or submission



In addition to the material-specific recovery rates, the quantity of each material category supplied by producers into BC should be made available.

While Recycle BC's announcement that, starting in 2010, it will report recover rates for the following materials – paper, plastic, glass, and metal – is a step in the right direction, it is not sufficient to enable vested stakeholders such as ourselves, to understand their current diversion performance and to work towards continuous improvement.

In closing, CCC commends Recycle BC for the quality of the consultation process that it has led to date, and we look forward to continuing the work to advance the important issue of transparency and data accessibility.

Regards,

A handwritten signature in black ink, which appears to read "Isabelle Faucher". The signature is written in a cursive style.

Isabelle Faucher
Managing Director,
Carton Council of Canada



CITY OF
CHILLIWACK

Allen Langdon
Managing Director
Recycle BC
230-171 Esplanade West
North Vancouver, BC V7M 3J9

May 14, 2018

File No: 5380-01
Engineering Department

Dear Mr. Langdon:

Re: Recycle BC EPR Plan – City of Chilliwack Feedback

The City of Chilliwack has reviewed the Packaging and Paper Product Extended Producer Responsibility Plan prepared by Recycle BC. The Plan content is fairly broad, so it is unclear if the concerns the City forwarded to Recycle BC in response to your consultation program last fall have been addressed.

The Plan still includes reference to recovering energy from the product within the pollution prevention hierarchy, which continues to be a concern for the City. We would like to take this opportunity to reiterate our concerns about air emissions. Please refer to the enclosed copy of the letter submitted on December 13, 2017 for details.

Our understanding is that there will be an opportunity for municipalities to review and comment on proposed revisions to the collector and depot operator agreements, and we hope the concerns that we raised in our December 13, 2017 letter are taken into consideration when those agreements are amended.

If you have any questions regarding the City of Chilliwack's feedback, please contact the undersigned at 604.793.2701 or tfriesen@chilliwack.com.

Sincerely,

Tara Friesen, P.Eng.
Manager of Environmental Services

Enclosure



Allen Langdon
Managing Director
Recycle BC
230-171 Esplanade West
North Vancouver, BC V7M 3J9

December 13, 2017

File No: 5380-01
Engineering Department

Dear Mr. Langdon:

Re: Recycle BC Consultation – City of Chilliwack Feedback

The City of Chilliwack has reviewed the changes proposed by Recycle BC and has concerns with a number of the proposed changes, as summarized below:

| Topic | Comments |
|---|---|
| Curbside Collection Financial Incentives | <ul style="list-style-type: none">• The financial incentives do not cover the cost of providing recycling collection services.• The administration top up for curbside collection should not be reduced from \$2.50/household, and should be the same regardless of whether collection services are carried out in-house or by a contractor. Providing a lower amount of compensation to communities with contracted collection service does not reflect the fact that contractors' administration costs are ultimately passed on to local government through the contract fees.• The depot top up for curbside collection should be available regardless of whether the local government provides depot services through an agreement with Recycle BC. Regardless of what organization operates the depots, there are depot-related education and promotion costs borne by the local government.• The financial incentives should include an annual inflationary increase.• Many of the proposed changes regarding the curbside collection program are overly prescriptive (e.g. requiring Recycle BC approval of a policy on tagging non-compliant materials, requiring approval of a detailed transition plan in order to change container types, requiring approval of significant promotion and education material regardless of whether it includes the Recycle BC logo, etc.). This level of control creates unnecessary bureaucracy and cost. |

| | |
|----------------------------------|--|
| Single-Use Bags | <ul style="list-style-type: none"> • The use of single-use bags for curbside recyclables should be discouraged but not prohibited. Many residents prefer to use blue bags (e.g. easier in windy conditions) and prohibiting their use may discourage participation in the program. |
| Other Flexible Plastic Packaging | <ul style="list-style-type: none"> • 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. • Recycle BC should ensure no net increase in air emissions related to alternative fuel. The City of Chilliwack is very concerned about air quality in the sensitive, confined, Lower Fraser Valley Airshed. • Given the processing challenges posed by certain types of packaging, Recycle BC and the Ministry of Environment should place more effort on trying to limit the use of unrecyclable packaging materials, either through disincentives or regulatory measures. For example, Recycle BC could charge producers a higher levy if they select packaging that is unrecyclable or is very difficult to recycle. |
| Recycling Depots | <ul style="list-style-type: none"> • A standard should be established to ensure residents from all communities have fair and equitable access to Recycle BC supported depots. There are only two Recycle BC depots in Chilliwack and the City has been bearing the expense of operating two additional depots to handle the local demand. Our depot operating costs increased from \$200,000/year to \$340,000/year due to the Recycle BC program because we had to expand the depots to include foam packaging and separated glass and film plastic. • Depot financial incentives should be consistent regardless of whether the depots are owned/operated by local government or the private sector. It is not reasonable to eliminate compensation for fibres and plastic containers at government depots. Even residents with curbside recycling service require depots from time to time (e.g. Christmas holidays, moving, etc.) and many residents in multi-family dwellings do not receive collection through Recycle BC. The depots would not be economically viable without compensation for fibres and plastic containers. |

If you have any questions regarding the City of Chilliwack’s feedback, please contact the undersigned at 604.793.2701 or tfriesen@chilliwack.com.

Sincerely,



Tara Friesen, P.Eng.
 Manager of Environmental Services



May 14, 2018

File: 5360-40-06

Allen Langdon, Managing Director
Recycle BC
230-171 Esplanade West
North Vancouver, BC V7M 3J9

Dear Mr. Langdon:

Re: Recycle BC Consultation – City of Abbotsford Submission

Thank you for the opportunity for the City of Abbotsford (City) to provide comments on the draft revised Packaging and Paper Product Extended Producer Responsibility Plan (Program Plan). The City is pleased to be part of the Recycle BC program, and will continue to demonstrate leadership by reaching its diversion targets and reducing greenhouse gases. The City has prepared this letter to summarize its comments as part of the Program Plan consultation process, and we look forward to the opportunity to provide further comments on proposed changes to the collector agreements in the coming months.

Streetscape Collection

The Recycling Regulation requires producers to develop a plan to collect packaging and printed paper from residential premises and municipal property that is not industrial, commercial or institutional property; however, the Program Plan does not appear to meet Recycle BC's obligation for this material. In addition, the approach for streetscape recyclables collection proposed during the November 2017 consultation is a deviation from the existing Recycle BC Program Plan in several aspects, and the proposed incentives do not reflect the cost of collecting packaging and printed paper from streetscapes. The City would like to reiterate that incentive payments should reflect actual costs for providing streetscape collection so that local governments are not subsidizing the collection of packaging and paper product that should be covered in the Recycle BC Program Plan.

Research and Development

The research and development program for additional flexible packaging continues to include elements that are of concern to the City. In particular, the City is concerned with the use of this material as an alternative fuel source and the potential impacts to the regional airshed. The City questions the claimed environmental benefit of utilizing this material in lieu of coal combustion, considering the increase in pollutants and greenhouse gases. In addition, using packaging as an alternative fuel source could increase waste volumes, as it creates a disincentive for producers to use materials with viable recycling end markets. Participation in the depot collection of additional flexible packaging should be optional in order for municipalities to decide if the program aligns with their respective community values and strategic priorities. The City continues to encourage Recycle BC to work with manufacturers and suppliers to develop and use packaging that has viable recycling end markets.

Proposed Changes to Depot Agreements

During the recent Program Plan consultation, further discussion was held between Recycle BC and local government stakeholders regarding proposed changes to depot agreements. The City understands that

Recycle BC is proposing to discontinue the mixed paper and containers financial incentive for local government recycling depots in communities that receive curbside recycling collection. Local government depots have a critical role in the Recycle BC program, by collecting materials that exceed the size or quantity suitable for curbside collection, accepting program materials not accepted at private depots, and offering recycling opportunities for residents that do not receive curbside service. The proposed changes would create an uneven playing field between the private and public sector and place additional costs on local ratepayers. The collection of mixed paper and containers is a basic service level that is expected at all depots in the Recycle BC network.

Thank you again for the opportunity to provide comments on the revised Program Plan. The City supports the Recycle BC program and its diversion goals, and will continue to meet and exceed its sustainability objectives and commitments as a leader in the solid waste industry. Your consideration of the City's comments is appreciated, and we look forward to continuing to work together with Recycle BC. Should you have any questions on the City's consultation feedback, please do not hesitate to contact Nathan Koning, Director, Project Management Office, at 604-557-1465 or nkoning@abbotsford.ca.

Yours truly,



Rob Isaac, Eng.L.
Acting General Manager, Engineering and Regional Utilities

- c. Mayor Henry Braun, City of Abbotsford
City of Abbotsford Council Members
Peter Sparanese, City Manager, City of Abbotsford
Teresa Conner, Senior Policy Advisor, Environmental Services Branch, Ministry of Environment
Leeanne Fraser, Senior Policy Advisor, Environmental Services Branch, Ministry of Environment



Engineering Department

2018 May 10

FILE: 36600 01

Mr. Allen Langdon,
Managing Director
Recycle BC
#230-171 Esplanade W.
North Vancouver BC V7M 3J9

Dear Mr. Langdon:

SUBJECT: RECYCLE BC PACKAGING AND PAPER PRODUCT EPR PLAN – CITY OF BURNABY SUBMISSION

Thank you for the opportunity to provide comments on the 2018 Packaging and Paper Product Extended Producer Responsibility Plan (the “Plan”). Upon reviewing the Plan, we submit the following comments:

1. Lack of Clarity and Detail

The Plan lacks clarity and detail. This, in addition to the limited consultation and absence of response to the detail issues raised in our letter to you dated 2017 December 13, make it very challenging for us to provide meaningful comments on the Plan.

2. Lack of Methodology to Demonstrate the Proposed Basis of Compensation for Services Rendered

In reviewing the BC Ministry of Environment and Climate Strategy Change Guidance Document titled “*Producers Paying the Cost of Managing Obligated Materials and Dispute Resolution*” and dated 2018 April 24, it is noted that:

“...the Director should be satisfied that the Plan adequately provides for the producer collecting and paying the costs of collecting and managing products within the product category covered by the Plan.”

“...the material provided during the stakeholder consultation should describe the methodology used by the producers to demonstrate the proposed basis of compensation for services rendered...the methodology should be transparent and detailed enough to clearly determine implications to their interests.”

The Plan lacks details on how it meets the subject Guideline. It does not have a transparent and detailed methodology to demonstrate the proposed basis of compensation for services rendered. In addition, the Plan also does not include mechanism for Stakeholder input into any future changes pursuant to Section 5(1)(b) of the Recycling Regulation.

3. Performance Measures

The Plan does not propose a recovery target, rather it proposes to establish targets to achieve a 75% recovery rate. After three years of operation, Recycle BC should have sufficient data to establish an appropriate target. In addition, in the previous PPP plan, MMBC excluded producer tonnage for communities which did not participate in the program. This practice of excluding producer tonnage should be discontinued in this Plan.

Recycle BC appears to be extending the timeline to achieve the goal to collect all packaging types, from 2017 to 2020 without explicit reasons for this.

There should be an annual reporting on recovery rates of foam and plastic film, and it should be included in this Plan.

There should be an annual reporting on the amount of non-recyclable PPP supplied into marketplace by their member stewards. The tonnes of non-recyclable PPP sold should be included as tonnes of PPP managed by disposal, as well as the amount of PPP included in streetscape bins, if Recycle BC does not proceed with an official streetscape program.

4. Lack of Addressing Outstanding Issues

As noted elsewhere in the letter, the City has previously submitted comments related to contamination, market clearing prices and bonus incentives, drive time requirements to post-collection service providers, Consumer Price Index adjustments, audit protocols, indemnity, Freedom of Information and Protection of Privacy Act implications, and split weight requirements. These issues continue to be challenging for the City and Recycle BC has yet to meaningfully consult the City on these matters.

While Recycle BC could state that the issues raised above are part of the contractual discussion between Recycle BC and the collector and does not have to be stated in this Plan, we would disagree and state that these issues do form an integral part of the methodology of paying the collector for the full cost of collection as per Ministry of Environment and Climate Change Strategy Recycling Regulation Guidance document (2018 April 24). The Plan must therefore identify key implementation approaches regarding these matters.

5. Streetscape

The BC Recycling Regulation makes the producer responsible for collecting and paying the costs of collecting and managing products. The Plan states that “Recycle BC will not directly undertake streetscape collection in their community” if municipalities decline the offer.

Although co-collecting recyclable material along with other waste streams on streetscapes makes sense to manage contamination, Recycle BC’s approach, which requires mandatory local government participation, does not meet the test of producer responsibility of collecting and paying the costs of obligated PPP, as described in the Ministry of Environment and Climate Change Strategy Recycling Regulation Guidance document (2018 April 24).

6. Depot Collection

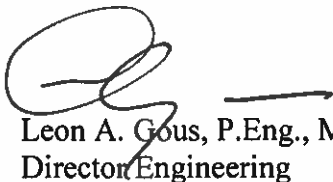
The Plan notes that “Recycle BC tracks the number of households without access to curbside or multi-family collection services and strives to provide reasonable access to depot locations in accordance with the Stewardship Agencies British Columbia’s (SABC) depot service standard.” We would note that the “SABC depot service delivery standard” is established by the industry and does not have a regulatory meaning or application.

The Plan needs to clearly state that Recycle BC will not eliminate incentive rates for paper, cardboard, and containers for Depots operated by Local Government and First Nations.

7. New Restricted Global Marketing Conditions

The Plan does not address how it responds to the new restricted global market conditions including creation of opportunities for creating local markets for recycled materials.

Yours truly,



Leon A. Gous, P.Eng., MBA
Director Engineering

JL/cp

Copies to: Bob McDonald, Director, Extended Producer Responsibility, Environmental Protection Division,
Ministry of Environment and Climate Change Strategy
Paul Henderson, General Manager, Solid Waste Services, Metro Vancouver



City of Richmond

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Richmond, BC V6Y 2C1
www.richmond.ca

May 14, 2018
File: 10-6370-01/2018-Vol 01

Engineering and Public Works
Telephone: 604-276-4000

Via email (consultation@recyclebc.ca)

Mr. Allen Langdon
Managing Director
RecycleBC
230 - 171 Esplanade West
North Vancouver, B.C.
V7M 3J9

Dear Mr. Langdon:

**Re: Consultation Feedback - Packaging and Paper Product Extended Producer
Responsibility Plan**

This letter provides feedback on RecycleBC's March 2018 Packaging and Paper Product Extended Producer Responsibility Plan. Please consider these as additional and/or supplementary comments in support of those submitted by Metro Vancouver.

We notice this plan is less robust in nature and therefore lacks clarity in certain areas. We appreciate the comments made by RecycleBC staff at the May 9, 2018 meeting with representatives of the REAC Solid Waste Subcommittee that the program has matured from a start-up to an operational plan, therefore contains less detail. However, we suggest some additional detail and clarity could be beneficial, including:

1. Section 4.2 refers to a financial incentive being provided to local governments, etc. who have chosen to deliver recycling collection services. We suggest this section would benefit from the incorporation of principles that identify what aspects are taken into consideration when developing the incentive, conceptually similar to the guiding principles in Section 4.9 with regard to program financing.
2. Section 4.4 discusses post collection services, but does not include discussion with respect to any strategies or approaches to address short and/or long term end market development for collected materials under this stewardship program. The plan should include alternatives to be considered or evaluated to address potentially longer term and/or increasing challenges relating to suitable markets for recycling commodities. As an example, it is noted that Section 4.3 of the plan references the market-clearing price being paid to qualified collectors once the PPP they have collected has been accepted for processing by a primary processor. What would happen in the event a primary processor does not accept PPP due to market conditions, for example?

3. We understand that RecycleBC does not intend that this Plan address operational details as these are contained in the Master Services Agreement and Statements of Work. However, we note there can be key impact drivers arising from requirements outlined in the Master Services Agreement and Statements of Work which can present financial risks to collectors. This can include changes in contamination protocols, market clearing prices and bonus incentives, drive time requirements to post-collection service providers, inflationary factors, audit protocols, indemnity, Freedom of Information and Protection of Privacy Act implications, split weigh requirements, change order implications, etc. Key information for stakeholders should be included in the Plan or mechanisms provided for collector and stakeholder input.
4. In relation to performance measures, it is noted the recovery rate is calculated based on that available for collection. However, the Plan appears vague on producer reporting requirements regarding the quantity of products they introduce and processes to ensure transparency and accountability. It is further suggested that the recovery target in the plan reflect some form of stretch targets designed for continuous improvement.
5. We note that Producers pay fees for all PPP and ancillary elements, including packaging which may not be collected (Section 4.9). The Plan should address how funds for materials which are not collected are used and the strategies to reduce, recycle or support those programs where these materials are actually being managed for recycling or disposal.
6. It is recognized that streetscape collection is a challenge in relation to quality of the collected product and marketability of same. Nevertheless, this should not translate into a unilateral determination by RecycleBC not to offer streetscape collection should local governments decline any offer to provide the service, particularly if the decision relates to the lack of cost recovery. Perhaps the Plan should identify greater emphasis by RecycleBC on education with residents on streetscape recycling and/or working with producers on more environmentally conscious take out packaging to help reduce streetscape litter and waste. Once more work in this area can be done and further pilot development undertaken, perhaps a more successful model can eventually be developed.

Thank you for your consideration of these issues and the opportunity to comment. If I can provide further information or clarification, please contact me at 604 233-3338.

Yours truly,



Suzanne Bycraft
Manager, Fleet and Environmental Programs

SJB:

pc: Paul Henderson, P. Eng., General Manager, Solid Waste Services
Teresa Conner, Senior Policy Advisor, Environmental Services Branch, Ministry of Environment

May 14, 2018

Mr. Allen Langdon, Managing Director
Recycle BC
230-171 Esplanade West
North Vancouver, BC V7M 3J9
VIA EMAIL: consultation@recyclebc.ca; alangdon@recyclebc.ca;

Dear Mr. Langdon:

RE: Recycle BC Program Plan Consultation - City of Vancouver Submission

Thank you for the opportunity to provide feedback on your draft Packaging and Paper Extended Producer Responsibility (EPR) Plan. Recycle BC has shown great leadership in developing the first fully funded EPR program in Canada, and we look forward to continuous improvement within this program for our residents.

We have reviewed and are in general agreement with the comments provided by Metro Vancouver staff and our additional comments are as follows:

Pollution Prevention Hierarchy

- Section 5.2 of the proposed program plan, Pollution Prevention Hierarchy, suggests that to 'Eliminate or reduce the generation of unused portions of a product that is consumable' is not applicable to packaging and paper product (PPP). In addition to speaking to products, the Recycling Regulation Guide speaks to the reduction of residual packaging being generated. While we recognize that Recycle BC acts as an agent of the Stewards, we see a role for Recycle BC in working with the Stewards around changes to packaging protocols to reduce generation and ensure that the remainder can be recovered.
Efforts to reduce the amount of packaging being distributed into the marketplace, before focusing on collecting and recycling it, is one of the overall goals of the program.
- We recognize Recycle BC's efforts around working with the Retail Council of Canada, and the industry in general, in developing the draft Best Practices for plastic bags and see similar opportunities for other materials. Initiatives to drive reduction, reuse and

ENG - TLO - Recycle BC Program Plan COV Submission - 2018-05 DOC/2018/220154

recycling of single-use items like plastic and paper bags, disposable cups and take-out containers, could also include support for:

- Collaborating with producers to expand EPR to these materials generated by the industrial, commercial and institutional (ICI) sector;
- Education and behavior change programs aimed at reduction and reuse;
- Cup, container and bag exchange programs; and
- Establishing targets and key performance indicators to reinforce the reduction, reuse, and recycling of these materials.

Streetscape:

- **Costs:** In the first approved program plan a commitment was made to establish a suitable market clearing price for streetscapes collection when the original pilot studies were completed. Recognizing that there is ongoing pilot work and a need to better focus and define streetscape recycling, we would suggest that further research into effective program operation and developing suitable market-clearing pricing for streetscape collection can be included as a commitment in the 2018 proposed program plan. We look forward to continuing to contribute towards this as we work to improve the results of the pilot project currently underway in Vancouver.
- **Product Pathway:** If a local government declines the market-clearing financial incentive offered by Recycle BC to provide streetscape services, municipalities should be provided with the option of Recycle BC providing for the collection, recycling services, public education, promotion and first point of contact for streetscape collections. If this pathway is not contracted or directly managed by Recycle BC, then it should be tracked as unmanaged product and quantities reported on in annual reporting as being managed outside of the stewardship program.

Performance Measures - Appendix B - Summary of Performance Measures

- The number and location of depots should provide reasonable access for all BC residents for collection of depot only materials (foam and plastic film), not just those residents without curbside or multi-family collection. Not all depots are equal in consumer convenience, and so where available, Recycle BC should review accessibility and contract with multi-program depots as outlined in the SABC Action Plan for Enhanced EPR, 2013, including municipal facilities.
- We would like to see the description and rationale behind recovery rates, performance targets and accessibility performance as set out in Appendix B - Summary of Performance Measures detailed within the main body of the program plan. Without the rationale behind these proposed performance measures, we are limited in our ability to comment on their appropriateness.
- In an effort to reduce contamination in the material streams, and to measure the efforts being made by Recycle BC in their directly serviced communities to educate residents on how to use the program correctly, a consumer awareness target that seeks to learn how well residents identify program materials and non-program materials would be an effective awareness metric. Web-based tools (sorting games) in use by some organizations could be utilized to support inclusion of this metric.

Methodology for Proposed Compensation

- We would like to see the program plan revised to reflect the guidance on Producer Paying the Cost released by the Ministry of Environment and Climate Change Strategy on April 24, 2018.

Market Condition Risks and National Sword

- We would like to see a definition of “recycling end markets” within the program plan to clarify what criteria Recycle BC will use when determining if their paper and packaging is going to be accepted for collection in their program.
- We recognize that Recycle BC will do everything they can to avoid a reduction to the ‘basket of goods’ currently accepted for collection within their program, and that they have worked hard to expand their program during their first few years of operation. However, if as a result of market conditions Recycle BC is forced to propose removing materials or specific packaging types from the ‘basket of goods’ currently accepted in curbside, multi-family or depot collection streams province wide, we propose that Recycle BC should be responsible to conduct the education and awareness campaigns of the change to all BC residents.

We look forward to participating in further discussion around changes to the Master Service Agreement. Please do not hesitate to contact me for further discussion of any of these matters.

Sincerely,



Albert Shames
Director, Zero Waste and Resource Recovery

tel: 604.873.7300
e-mail: albert.shames@vancouver.ca

cc: Bob McDonald, Director, Environmental Standards Branch, Ministry of Environment and Climate Change Strategy
Paul Henderson, General Manager, Solid Waste Services, Metro Vancouver
Regional Engineers Solid Waste Sub-Committee members

From: Mark Smith <mark.t.smith@clorox.com>

Sent: Monday, May 14, 2018 8:20 PM

To: Recycle BC Consultation <consultation@recyclebc.ca>

Cc: Allen Langdon <alangdon@recyclebc.ca>; Michael Pilato <Michael.Pilato@clorox.com>

Subject: Clorox Company Input for Revised Program Plan

Allen and Recycle BC Board:

The Clorox Company of Canada Ltd. has been a registered steward under the Recycle BC program since the program's inception. Additionally, we have a long established history of supporting British Columbia municipalities since the early 1990's with the design and implementation of highly successful waste diversion strategies that include the utilization of the GLAD® "See Through" Blue Bag. Our Glad® brand is the category leader in the trash space and Glad® is Clorox Canada's largest revenue business, playing a critical role in supporting 377 direct and approximately 1,200 indirect Canadian jobs.

We are writing today to reiterate our strong opposition to the proposed 18 month transition away from recycling bags and ask that this stipulation be struck from existing and future contracts between Recycle BC and its municipal partners.

As a steward competing in a highly-competitive industry facing a double digit cost increases to our stewardship fees in BC next year, we don't support the elimination of a curbside collection solution that has been shown by a recent York University study (attached) to beat carts and boxes on all-in cost, contamination rates, and the value of post-recyclable material, as well as perform better on diversion rates than carts and boxes alone.

Today, the current recycling model is under intense pressure from China's new stringent import quality requirements. In this context, the study points to a cost effective way to add surge capacity to existing curbside collection that will increase diversion and lower contamination today and, long-term, to a system that promises better diversion, contamination and value of post-recyclable materials for a lower all-in cost. China's National Sword initiative has changed the dynamic for end markets that the program has relied on for the recovery of approximately 20% of its costs. While Recycle BC has chosen not to increase tonnage rates this year and dip into reserves, the demonstrated ability of none of the present cart, bag or blue box curbside collection strategies to hit the extremely low contamination rates being demanded by the Chinese, make the viability of this strategy suspect and the likelihood of additional cost increases highly likely.

Additionally, transitioning out of bags eliminates important sources of revenue for the very stewards that support your programs that sell either branded, as is our case, or private label blue recycling bags in the province. This business supports well-paying jobs for hard working Canadians, generates tax revenues at the local, provincial and federal level, as well as investments in manufacturing and R&D here in Canada.

Presently, communities across British Columbia including the District of Mission, Abbotsford, Chilliwack and Salmon Arm have implemented highly successful recycling collection programs that include the use of "see through" blue bags. From the comments submitted by these jurisdictions to Recycle BC as a part of this process, the option to use bags is popular with residents and municipal waste systems alike because they are scalable, easier to manage for disabled or elderly residents, resistant to wind and don't take up a lot of increasingly dear space in BC homes and garages as they can go directly from the kitchen to the curb. Residents in these communities should continue to have the option to use bags.

Even municipalities with cart-based systems have voiced the support for the use to bags for surge capacity. Why should recycled material end up in the trash when there is an easy option available to

keep this material out of the landfill? Additionally, bags should be viewed as a complement to blue boxes in communities where this approach is used as they can help solve wind and surge capacity issues, can go seamlessly from the kitchen to the curb and can help improve the quality of the recyclables in the boxes. Given the pressure on the current recycling model from China, elimination of a solution that is supported by residents and waste management authorities in the municipalities where they are used, only to substitute it for a less effective higher cost option is against the interests of Stewards and the communities that Recycle BC serves.

Recycle BC's proposed move to promote a blue box system as the preferred choice for curbside collection was preceded by a similar approach in Ontario in the 1990s and 2000s. B.C. can learn important lessons from their experience. Today, Ontario municipalities continue to wrestle with the limitations of blue box systems beyond their lack of all-in cost-competitiveness, specifically: litter issues caused by wind and limited scalability. Subsequently, Ontario is experiencing a resurgence of interest in evolving programs to enable residents to utilize see through blue bags to place recyclable contents curbside either with blue boxes or as a stand-alone. This past spring, the region of Halton, Ontario decided to allow residents to use recycling bags to collect and store their recycling materials for collection. Other jurisdictions across the country, like those in Atlantic Canada continue to expand curbside blue bag recycling programs.

In analyzing the processing side of the equation, separating a collection mechanism or tool (blue recycling bag) from waste (shopping bag) is critical. Any survey of MRF operations will show that the overwhelming majority of the bags getting wrapped around machinery are shopping bags not blue recycling bags. As such, blue recycling bags shouldn't be made the culprit for down time at municipal recycling facilities. Investments in bag breakers or additional sorting staff to better accommodate recycling bags will also help deal with the shopping bags (which are the real issue) and pale in comparison to the capital investments necessary to implement cart or blue bin programs. While there are challenges with all of the curbside collection mechanisms, bag breakers are being used successfully in municipalities throughout the country and we would be happy to connect you with MRF operators that are currently using them in their systems.

We thank you for the opportunity to provide our feedback and look forward to the opportunity to continue the dialogue with Recycle BC about this proposal.

Sincerely,

Mike Pilato
General Manager
Clorox Canada

Mark Smith
Director, Government Affairs – International
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Oakland, CA 94612
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Cell: 510-289-4832
mark.t.smith@clorox.com



May 14, 2018

Recycle BC
230-171 Esplanade Ave West
North Vancouver, BC

email: consultation@recyclebc.ca

Dear Sir/Madame,

Re: Emterra Environmental comments regarding Recycle BC's revised Packaging and Paper Product Extended Producer Responsibility Plan

Emterra Environmental applauds the efforts of Recycle BC to expedite BC's transition to a low carbon, circular economy. We provide our comments herein to convey the willingness of our company to be a strong partner and to provide decision makers with timely and relevant information and expertise that stems from 42 years of doing business and partnerships in the waste and recycling industry.

Emterra supports and promotes the development of a dynamic and adaptive recycling regime for BC, one that is responsive to evolving improvements in innovative paper product and packaging (PPP) design rather than a system that promotes the status quo simply because the end of life output is compatible with the existing collection and processing infrastructure and systems.

Another impetus that change to the Program must happen now is the China National Sword. This campaign is definitely causing permanent disruptions in the industry but it offers urgency for BC and the rest of the world to implement a truly circular economy. For example, BC has a significant plastics processing economy. Increased supplies of quality curbside materials will foster the growth of a local, sustainable circular economy for all plastic materials. This will then allow future post-consumer recycled content mandates to be achieved in a more economically, socially, and environmentally superior manner.

Given the numerous and lengthy submissions Recycle BC has likely received thus far, Emterra's submission will hopefully stand out in its brevity and directness while providing meaningful feedback on the revised PPP EPR Plan.

Recommendations

Emterra respectfully submits the following recommendations for a smooth, fair and timely transition:

- Circular Economy
 - We strongly support the engagement in and direction towards building circular economies. In particular, we support Recycle BC members to commit to using recycled-content in packaging (preferably post-consumer recycled content), and to not only produce packaging with recyclable or compostable materials.
- Contamination
 - We strongly support Recycle BC's efforts to provide active and meaningful incentives in reducing contamination at curbside.
- Recovery Rates
 - Transparent calculation and definition of collection, recovery, recycling rates and all other applicable performance metrics.

- Recovery rates should be reported at a more granular level for transparency, accountability, and planning purposes. Further subdivision of the proposed four material categories (i.e. plastics, paper, glass, and metal) and creating recovery rate targets for the specific material categories would drive environmental performance and outcomes.
- Timelines
 - Timeline for achieving the 75% recovery rate and material specific recovery rates can and should be expedited to drive environmental performance and outcomes.
- Intellectual property
 - Neither Recycle BC nor Canadian Stewardship Services Alliance (CSSA) should have control and ownership of any intellectual property, operation, or technology, and that could ultimately provide any competitive advantage.
- Measurement
 - Measurement of environmental performance of PPP should recognize the carbon reduction contribution and the potential for material preservation rather than only mass of material diverted.
- Consultation Process
 - What is the outcome of the consultation that was conducted in November 2017? Many of the proposed changes and recommendations in the consultation are not discussed in the revised program plan (e.g. there is no mention of contamination levels at all). How has feedback from the consultation been taken into consideration?

In conclusion, Emterra recognizes and appreciates the thought and volume of work that has been put into the consultation process and resultant draft revised PPP EPR Plan. Emterra is ready and willing to make immediate and meaningful contributions. If you have any questions or comments about this submission, please do not hesitate to contact me.

Sincerely,
Halton Recycling Ltd. dba Emterra Environmental



Emmie Leung
CEO

CC Paulina Leung, VP, Corporate Strategy and Business Development, Emterra Group
Ed Walsh, VP, Operations, BC, Emterra Environmental

From: Jamie Benton <jbenton@fvrd.ca>
Sent: Monday, May 14, 2018 4:31 PM
To: Recycle BC Consultation <consultation@recyclebc.ca>
Cc: Teresa Conner <Teresa.Conner@gov.bc.ca>
Subject: Fraser Valley Regional District comments

Hello Allan and Team,

Please find below comments from the Fraser Valley Regional District (FVRD) about the current Recycle BC consultation for the Revised Program Plan as presented on April 17, 2018. These comments reflect the views of the regional district in general on account of having 3 municipalities with contracts with Recycle BC and 3 other municipalities and 8 Electoral Areas who do not have a contract but invariably have residents who are directly affected by the Recycle BC program requirements.

Comments

- The FVRD considers the opportunity to comment on the revised program plan as presented in April 2018 only one part of the Recycle BC consultation process.
- In November 2017 Recycle BC conducted what the FVRD believes was a pre-consultation process in order to garner comments on operational issues with the current program plan. The FVRD does not believe that it was consultation as portrayed by Recycle BC.
- This consultation period meets the Ministry of Environment guideline of a minimum 45 days. The FVRD is disappointed that a longer time period was not pursued. More time to review the draft program plan would have allowed greater flexibility of Regional Districts to consult with their member municipalities and Elected Officials to garner greater feedback for Recycle BC.
- The FVRD believes that the draft program plan does not adequately address the issue of performance measures. Recycle BC has met the 75% recovery rate in previous years and should be setting continuous improvement targets for recovery rate. It should not just result in program changes if the recovery rate is not met as expected this year.
- The revised plan is lacking in addressing a shortfall of performance measures. Measures such as accessibility, especially in rural areas are a necessity in order to drive further improvements in the plan. Performance measures should also be set for reduction efforts with specified packaging groups and with greater context of what Recycle BC and producers are doing to make recycling easier for consumers.
- The program should assume the full financial responsibility for delivering the services of the program in each area including capital equipment and education.
- The program should be transparent and accountable especially when it comes to fee rates and finances. This includes those paid to collectors that provide services to Multi-Family Dwellings.
- The FVRD does not agree that the multi-laminate material as set out in the draft revised plan should be collected with the intention of burning the material until such time that it can be recycled. Recycle BC should not be sending any material to an incinerator and should be

working harder to lobby the plastic industry to design materials that provide greater recovery and recycling rates. The FVRD is encouraged by Recycle BC's effort to stay at the forefront of work done by the Ellen McArthur Foundation and Canada's Circular Economy Innovation Lab (CEIL) and efforts to involve its members and processors.

- Residents of BC continually struggle with recycling. Recycle BC needs to lead the way in helping everyone in BC understand what materials are recyclable and what is actually recycled. How and why are two words that need far more explanation in the revised program plan? For example, start by simply providing how much plastic is collected and how much is recycled.

Kind regards,

Jamie Benton

Jamie Benton

Environmental Services Co-ordinator

45950 Cheam Ave, Chilliwack, BC V2P 1N6

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From: Doug & Elizabeth Latta <delatta@telus.net>
Sent: Wednesday, May 2, 2018 1:15 PM
To: Recycle BC Consultation <consultation@recyclebc.ca>
Cc: kim harris <kimharris55@gmail.com>; Grant Peter <recycling@saltspring.com>; Niki Roberts <nikiroberts@penderislandrecycling.com>; nancy gerber <gerber.nancy@gmail.com>; MacGillivray Bonnie <galibm@telus.net>
Subject: RBC revised programme plan feed back

Dear Mr. Langdon,

I represent the Galiano Island Recycling Resources Society. In response to your request that interested parties respond to your 'revised' plans for Recycle BC in the next contract period, we are extremely disappointed that you have made no attempt to address the concerns of our depot, and other rural depots represented in the consultation review, with regard to proper funding for our organization. Your lack of response to the unique challenges which face remote depots, in our case those on the Southern Gulf Islands, is extremely disheartening. We have put in hours of work evaluating the performance of our own depot as well as endeavouring to educate your organization in the initially flawed parameters upon which you based our recompense for PPP materials. We were led to believe, both at meetings at the CWMA conference and the RBC Consultation process in New Westminster, that we were heard and that our issues would at least be addressed in some way. But you have chosen to ignore the input of our depot and those like us throughout the province.

The inappropriate funding of our island recycling service has led, as you are probably aware, to once again having the CRD cover the large gap for our operating expenses for the next period. This cannot be a long term solution.

We remain hopeful that a resolution to this large funding shortfall for our depot can be achieved and will continue to work to that end.

Thank you for your attention to our concerns,
Elizabeth Latta
Galiano Island Recycling Resources.ki

From: Sturgeon, Shauna (AADNC/AANDC) <shauna.sturgeon@canada.ca>
Sent: Monday, May 14, 2018 5:17 PM
To: Recycle BC Consultation <consultation@recyclebc.ca>
Cc: 'Bob.McDonald@gov.bc.ca' <Bob.McDonald@gov.bc.ca>; 'Teresa.Conner@gov.bc.ca' <Teresa.Conner@gov.bc.ca>
Subject: RecycleBC Stewardship Plan Comments

Hello,

Thank you for taking the time on April 3, 2018 to meet with me to discuss RecycleBC's Stewardship Plan as it relates to First Nations in BC. I look forward to working together to improve recycling for First Nations in BC.

I believe there is significant opportunity to involve First Nation communities within the RecycleBC Packaging and Paper Product Extended Producer Responsibility Plan (Plan). I believe the solid waste management programs ongoing and under development, by BC First Nations will align with the goals of RecycleBC. Many of these programs have the potential to produce residential PPP with RecycleBC acceptable levels of contamination.

In review of the latest Plan, I notice there is little information specifically addressing how remote, rural and urban First Nations may be included in the Plan. I do believe there are number of eligibility criteria in the Plan that will exclude most First Nation communities, including:

- limiting the size of a community eligible for curbside collection
- limiting the curbside collection program only to incorporated municipalities
- requiring a particular date of commencement of curbside collection programs within a community
- stipulating that curbside collection cannot be consolidated prior to being shipped to a RecycleBC depot

In many remote and rural First Nation communities it has been found that an efficient collection method is to have a member of the community collect the PPP from each household in a truck and consolidate at a community depot prior to shipping to a RecycleBC depot. My current understanding is that this type of collection is not allowed in the RecycleBC Plan, as the community would either be:

- ineligible for curbside collection under the program due to the size/incorporation status, or
- ineligible to use a depot as the collector would be considered a commercial hauler by RecycleBC

Some flexibility in the above matters would greatly benefit many communities and help them become full partners in your program.

Thank you,

Shauna Sturgeon, P.Eng.
Project Engineer, Specialist Services
Community Infrastructure Directorate
Indigenous Services Canada
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Vancouver, BC, V6E 4S3
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Shauna.Sturgeon@Canada.ca

MAY 14 2018

File: CR-24-03-EPR-12

Mr. Allen Langdon, Managing Director
Recycle BC
230-171 Esplanade West
North Vancouver, BC V7M 3J9
VIA EMAIL: consultation@recyclebc.ca

Dear Mr. Langdon:

Re: Recycle BC Packaging and Paper Product EPR Plan – Metro Vancouver Submission

Thank you for the opportunity to provide comment on the draft 2018 Packaging and Paper Product Extended Producer Responsibility Plan. Metro Vancouver staff would like to submit the comments below as feedback on the Recycle BC Packaging and Paper Product (PPP) program. Member jurisdictions may also submit comments on behalf their own communities.

Metro Vancouver staff comments:

- **Streetscape:**
 - **Scope:** The Recycling Regulation requires that producers develop a plan to collect packaging and paper products from municipal property that is not industrial, commercial or institutional property. Although Recycle BC defines reasonable access for streetscape, further clarity in the PPP plan is required to understand whether the proposed streetscape offer will meet the requirements of the Recycling Regulation.
 - **Costs:** The Recycling Regulation makes the producer responsible for collecting and paying the costs of collecting and managing products. Recycle BC's PPP plan identifies some key challenges (e.g., contamination and markets) to launching a full streetscape recycling program at this time. If a streetscape program cannot be implemented due to current conditions, other potential options that Recycle BC may consider include: additional studies to improve sorting of materials to reduce contamination, funding contributions to municipal public space litter collection or other similar measures.
- **Master Services Agreement and Statements of Work:** In the past, Metro Vancouver and member jurisdictions submitted comments related to contamination, market clearing prices and bonus incentives, drive time requirements to post-collection service providers, Consumer Price Index adjustments, audit protocols, indemnity, Freedom of Information and Protection of Privacy Act implications, and split weight requirements. These issues continue to be challenging for municipalities participating in the Recycle BC program, and key implementation approaches should be discussed in the Plan in order for stakeholders to submit informed comments.

- **Universality/Level Playing Field:** Recycle BC's approach to add collectors "as soon as is practical and feasible from a financial and operational perspective" does not provide clear criteria for when new collectors will be added. In addition, we understand Recycle BC initially proposed modifications for depot collectors to reduce financial incentives for local government and first nation collectors. We do not support any such reduction. The language in the PPP plan should be precise, and it should present clear and consistent procedures to 'onboard' collectors and depots which meet the Recycle BC criteria. For example, it is our understanding that Recycle BC uses different approaches for different types of collection:
 - **Curbside Collection:** Existing curbside collectors that wish to join the program may execute agreements and start in the upcoming program year. Acceptance of communities that wish to transfer to Recycle BC direct service will not be reasonably withheld, and also have a procedure and timeline prescribed in the plan, with transition starting in 2019.
 - **Multi-Family and Depot Collection:** We understand that some eligible multi-family haulers and depot collectors are currently 'waitlisted'. Unlike curbside collection, the plan does not specify any timeline for adding multi-family or depot collectors. Recycle BC should develop a process where any multi-family or depot collectors, that meets the eligibility criteria, should be admitted into the program on a prescribed schedule with defined criteria.

- **Performance Measures:** Recycle BC's PPP plan proposes to establish targets to achieve a 75% recovery rate. The PPP plan should include a timeline for achieving targets established in Recycle BC's plan. To increase transparency of program performance, Recycle BC should consider reporting the following:
 - tonnes of material collected by Recycle BC,
 - tonnes collected through product pathways not directly managed by Recycle BC,
 - tonnes of non-recyclable PPP sold,
 - recovery rates of foam and plastic film, and
 - progress towards the goal to collect all packaging types.

We look forward to participating in upcoming discussions related to the PPP plan. Please do not hesitate to contact me for further discussion of any of these matters.

Sincerely,

A handwritten signature in black ink, appearing to be 'Paul Henderson', written over a light blue horizontal line.

Paul Henderson, P.Eng.
General Manager, Solid Waste Services

PH/AD/ah

cc: Teresa Conner, Senior Policy Advisor, Environmental Services Branch, Ministry of Environment
Leeanne Fraser, Senior Policy Advisor, Environmental Services Branch, Ministry of Environment
Regional Engineers Advisory Committee and Regional Engineers Solid Waste Sub-Committee members.

Recycle BC Consultation Points

Submission Deadline – May 14, 2018

Peace River Regional District (PRRD) staff will be submitting comments on the consultation for Recycle BC's updated program plan through two forms:

- Directly to the Recycle BC site prior to May 14, 2018.
- Via the British Columbia Product Stewardship Council (BCPSC).¹

In working with the BCPSC, the following themes have been identified and compiled.

Issue 1: Performance Measures

- Assess diversion rates on a Regional District Basis

Under the Recycling Regulation Part 2 Section 5:

- (a) *the plan will achieve, or is capable of achieving within a reasonable time,*
 - (i) *a 75% recovery rate, or another recovery rate established by the director*

Appendix B- Summary of Performance Measures of the Plan “submit targets to achieve a 75% recovery rate if a 75% recovery rate is not achieved due to on-boarding timing.”

Recycle BC maintains that they recover 75% of the PPP materials within the province of BC. There are two issues with this number:

1. Their eligibility criteria, as outlined in the Plan, excludes a high number of rural and small communities throughout the province of British Columbia.
2. The 75% claimed recovery only accounts for those stakeholders that have met the eligibility criteria required to be partnered with Recycle BC.

A true recovery rate, taking into consideration all municipalities and all collection programs that operate outside of Recycle BC's eligibility criteria would ensure a more representative collection rate for the Province of BC in regards to packaging and paper products.

Please note:

In the original Recycle BC plan and [2016 amendment](#) there was a footnote (#33) on page 29 that read “*Should a local government that is currently providing collection of PPP decline the market-clearing price and indicate that it wishes to continue to provide the PPP collection service, the quantity of PPP supplied to the local government's residents will be deducted from total PPP supplied by producers (using average kilograms per capita) to ensure that the PPP supplied in the denominator of the recovery rate calculation reflects the areas from which PPP in the numerator is collected.*” . Their approach seems to be that if they cannot control the collection of the product, that tonnage should not be considered a part of their responsibility. This relates to “Issue 3: Recovery Rates.”

¹ The BCPSC is a group of Solid Waste/Env. Services professionals that represent all regional districts on stewardship matters.

Issue 2: Eligibility into the Program

- In the new program plan (page 7 and 8) Recycle BC states that, for local governments to join the program as contracted collectors, the following criteria is met:
 - o A curbside garbage collection program was in play by May 2014
 - o The community represents an incorporated municipality; and
 - o The community has minimum of 5,000 residents.
- These requirements limit incorporated municipalities that have a population of under 5,000 residents. This means that only the City of Dawson Creek and the City of Fort St John would meet the criteria to operate a curbside recycling collection program under the Recycle BC framework². These requirements are restrictive and do not service the residents of PRRD. It is noteworthy that two of the “non-eligible” incorporated municipalities either have an established curbside program (Village of Pouce Coupe) or are piloting a program (District of Chetwynd).
- PRRD staff would suggest to Recycle BC that the “and” should be changed to “or” within the eligibility requirements as it would be more inclusive.
- As well, the program should cover all geographies, not just those that offered a certain service at a certain date or collected a certain weight. These geographies should be set by a committee of local governments along with the provincial government and replace the Stewardship Association of BC (SABC) standard set and used by Extender Producer Responsibility (EPR) programs. The service delivery should be equitable.

Issue 3: Recovery Rates

- Recycle BC used altered recovery rates, where if a municipality opted out of the program, that material in that area was not covered under their recovery rate. The updated Program Plan, does not address if this recovery rate will be updated. Recovery rates should be inclusive of all packing and printed paper sold by producers within the province.

Issue 4: Consultation on Revised Program Plan

- If a municipality is interesting in operating a Recycle BC Program they will have to get in touch with Recycle BC as Recycle BC will not be reaching out.
- Recycle BC did not adequately consult on their Program Plan update. On November 15 and 16, 2017 Recycle BC held a consultation with stakeholders in New Westminster, which PRRD staff participated in as we operate Recycle BC Depots. The aim of the consultation was “to build on our existing partnerships, and to evolve our program’s performance to ensure its continued success (2017 Consultation Pre-read Workbook).”

On page 16 of the revised Packaging and Paper Product Extended Producer Responsibility Plan, released to the public in March 2018, Recycle BC states that the November 2017 consultation was conducted to “gather stakeholder feedback and provide program updates” and to meet the regulatory requirement of stakeholder engagement as part of the original plan.

² However if the areas that are not eligible for a Recycle BC Curbside Recycling Program wanted to, there may be a possibility for them to establish a Recycle BC Depot to service their residents in lieu of not meeting Recycle BC curbside recycling collection requirements.

Treating the November 2017 performance review consultation as meeting the regulatory requirement for stakeholder consultation is a misrepresentation as only stakeholders who were partnered with Recycle BC at the time were invited to the consultation, excluding any stakeholder who did not have a partnership agreement with Recycle BC. Additionally, the November 2017 was billed by Recycle BC as a performance review, and not advertised as a regulatory requirement for Plan review as the revised plan was not released to the public for consultation until March 2018. Consultation requirements are as follows:

Under the Recycling Regulation, Part 2, Section 6:

A producer must review its approved plan, and

- (a) Submit to a director proposed amendments to the approved plan, or*
- (b) Advise a director in writing that no amendments to the approved plan are necessary,*

No later than the date that is 5 years after the date the approved plan was originally approved under section 5 and every 5 years thereafter.

Under the Recycling Regulation, Part 2 Section 5:

- (b) The producer has undertaken satisfactory consultation with stakeholders prior to submitting the plan for approval and will provide opportunity for stakeholder input in the implementation and operation of the extended producer responsibility program.*

The consultation in November did not allow non-participatory or future stakeholders (local governments that do not have a Recycle BC depot or curbside program) to participate, which seems to make the consultation process incomplete.

Issue 5: Paying for the Program

- The program should assume full financial responsibility of delivering the service no matter where you are in the province. The program funding model should take into account location and location variability (urban vs rural).
- Program should assume full financial responsibility for delivering the services of the program, not just provide incentives (for all curbside, multi-family and depots, including capital equipment, education and a system for reducing materials). This may include paying different amounts in different communities if a service cannot be offered or contracted for the existing incentive. The determining factor should be the need to deliver the service, not if the service can be secured at a given rate. Recycle BC should be mandated to deliver the service if a contracted party cannot be found.

RECYCLE BC CONSULTATION PROCESS



November 28, 2017

File No.: 5380.04
EPR Consultation

consultation@recyclebc.ca

Re: Consultation RecycleBC Curbside and Depot Services

Thank you for the opportunity for consultation on the proposed changes to RecycleBC collection and depot contracts. The Pre-Read Workbook, Custom Information Package and Consultation Event in November were well organized and clear. RecycleBC has done an excellent job of communicating their proposed changes and allowing for dialogue with local governments.

This letter outlines the concerns of the Regional District of Okanagan-Similkameen (RDOS) to proposed changes to the RecycleBC program. The RDOS was one of the first local governments in the Interior of BC to open recycling depots. The majority of our residents have been serviced by curbside recycling collection programs for more than a decade. Recycling is a motherhood issue for our citizens and elected officials.

Removal of Clear Plastic Bags as a Container

The RDOS, in partnership with the City of Penticton, District of Summerland, Town of Osoyoos and Town of Oliver, awarded a 7 year contract for collection to Waste Connections of Canada starting July 1st, 2018. This resulted from a RFP issued in the spring of 2017. As the RecycleBC consultation documents were received October 12th, 2017 any proposed changes could not be considered in the RFP process. To allow for the delivery of a new split truck collection fleet, the RDOS and participating member municipalities must sign this contract within several weeks. There is no room for extending these deadlines partially due to the persistent breakdowns of existing vehicles.

RDOS rural service areas and the Town of Osoyoos have opted to keep their present collection method of customer supplied containers. Residents will be able to use clear plastic bags, reusable manual containers and carts provided by the home owner. Penticton, Summerland and Oliver have opted for automated cart collection including RFID tag detectors, internal cameras and a reporting system for contamination in loads. The carts in these communities will be supplied through the local government; either directly or through Waste Connections.

RecycleBC is proposing to ban the use of single-use bags and requiring collectors to provide reusable containers for July 1st, 2020. RecycleBC has commented the main reason for this change is to remove non-recyclable film plastic received at Municipal Recycling Facilities. To paraphrase comments heard, allowing non-recyclable film plastic to enter the recycling stream is against the philosophy of RecycleBC. It was also mentioned that in some receiving locations the bags are opened by hand which can be a hazard for workers.

RecycleBC has stated they are not encouraging local governments to adopt mandatory cart collection. This is most likely due to the higher contamination rate found in cart collection services.

Looking around BC, the main alternative to plastic bags or cart collection is multi-stream collection using manually collected blue boxes. Multi-stream collection is not a possibility for the RDOS at this point. The fleet of vehicles being ordered by Waste Connections will be split trucks that will collect refuse every week. Yard waste will also be collected on alternate weeks in many communities. This set up only allows for single stream collection. The business case for multi-stream collection has been explored but with long rural routes, often along major highways, sending a second truck was deemed too costly and inefficient.

Judging by the incentives offered and comments on automated cart collection, RecycleBC envisions a single stream blue box collection method where the collector can manually remove contaminants at the curb. Due to weight and volume concerns of bi-weekly collection this would mean supplying at least two large coloured boxes to each home. The RDOS is unaware of any jurisdiction in BC that presently collects single stream recyclables using a method for multi-stream collection.

A key concern for the RDOS is the use of blue boxes along major highways, rural areas and areas of high winds. The RDOS services Highway 97, Highway 3 and Highway 3A. These major highways result in issues with blue box collection including wind from passing vehicles and snow removal affecting both the blue boxes and materials left inside. Rural areas lack curbs, have long driveways and have more birds and animals that can get into and spread non-contained recycling. Wind, especially in the narrow Similkameen valley, can be severe. Wind blown litter along these corridors has the potential to increase. Several areas primarily use clear bags, often with a rock on top, as empty reusable containers can be blown away into traffic.

The RDOS has evaluated a variety of collection methods and for rural areas single stream, split-truck collection is the most efficient. RecycleBC has shown that where multi-stream collection is not possible, single use bags create less contamination than cart collection. Allowing for the continuation of blue bag collection would reduce contamination rather than requiring the RDOS to provide cart service. The other option is for the RDOS to remove service and require RecycleBC to directly contract recycling collection in these rural areas.

The RDOS has been lead to believe that, even discounting additional contamination, that single stream collection recovers more materials per home than multi-stream collection. If this is true then single stream blue bag collection recycles more materials while reducing contamination versus cart collection.

The Green By Nature MRF in Kelowna has successfully received blue bags recyclables for decades. Unlike other smaller receiving depots that open the bags by hand, our understanding is this MRF is equipped to mechanically remove the plastic bags. If this is the case then continuation of blue bag collection will not create undue hazards for workers.

- The RDOS requests a meeting with local Green By Nature representatives to better understand the inherent contamination and worker safety concerns caused by blue bag collection. We would like to understand if these concerns can be mitigated.
- We request that RecycleBC not require the removal of blue bags as a collection option. Our contract with Waste Connections expires in June 2025. The RDOS can explore other collection options in early 2024 for implementation in 2025.
- The implementation of a blue box program in rural areas along highways is not deemed as practical by RDOS Staff. Banning blue bags in 2020 will require the RDOS to implement cart collection or require that RecycleBC contract directly for curbside collection in our service areas.

Removal of Tonnage Incentives for Type 3 Depots

RecycleBC has proposed new definitions for depots. Type 1 would be in an area where a significant proportion of residents (undefined at this time) do not receive curbside collection. Type 2 would be private depot in any community. Type 3 would include any Local Government depot operated in an area where almost all homes receive direct curbside collection.

A concern for the RDOS is these definitions are undefined. The Princeton Landfill has a large segment of population outside the Town of Princeton not serviced by curbside collection. It would appear that this landfill will be a Type 1 depot? Other facilities service Indian Bands without RecycleBC curbside collection that make up a small proportion of the local population. Will local governments need to provide StatsCan data regarding pockets of non-collection to determine if depots are Type 1 or 3?

RecycleBC has proposed that Type 3 depots will not be paid a tonnage incentive for materials collected. RecycleBC will still provide a 25 cent curbside Depot Top Up incentive per home and collect materials for free from depots. Depots would be required to continue all requirements including manned operation, fences and signage.

Depots can also opt out of RecycleBC collection and market their own recyclables. Judging by present prices and future demands on the quality of recyclables this is not realistic. RecycleBC has stated there will be no opt back in if markets continue to get worse.

The reasoning for the removal of tonnage incentives is puzzling. RecycleBC will continue to subsidize depot operations with a flat 25 cent per home curbside payment but wants to discourage local government depots? Private depots will be incentivised where curbside is available but not local government operations providing the same service at similar costs (actually higher as our Staff are unionized)? It is recognized that a certain percentage of residents may use depots but no allowances in Type 3 depots based on size of population served? RecycleBC wants to disincentivise Type 3 depots but recognizes the materials are PPP and will maintain all collection costs by Green By Nature?

RecycleBC already has contract provisions that require local governments to either divert or account for ICI materials. If this is the true concern of Type 3 depots, as it is not mentioned in the consultation documents, then it can be addressed through existing powers in the contract.

The best judge of whether a depot is worthwhile is the tonnage of materials received. The per tonnage incentive is an elegant way for determining if a depot is cost effective or required. The Campbell Mountain Landfill is one of two depots for over 50,000 people. RecycleBC should encourage well sited and operated depots that service a significant population regardless of whether they are private or local government. Local governments also provide depots in communities where there are no private depots. For these communities the depot is recognized as a necessary service as there are times when homeowners reasonably opt to use a depot rather than wait for curbside collection.

Local Governments have also invested in capital improvements based on continuation of per tonne incentives. RecycleBC introduced the collection of mega-bags which required new structures. The RDOS has purchased modified shipping containers to allow for safe drop off and storage of mega-bag materials. This includes paper and containers at smaller facilities with limited volumes. Even where these structures are only used for film, glass and polystyrene, the incentives from paper and containers are used to help pay for the additional costs where available. Removing incentives by weight will significantly reduce the ability to pay back the capital costs of these structures or install more structures where needed to protect materials from wind and rain.

- The RDOS believes the per tonne incentives are a fair way to fund local depots for both private sector and public depots. Paying depots that collect RecycleBC materials by weight forces Local Governments to fairly evaluate the need for depots which receive low volumes. Removing incentives unnecessarily targets public sector depots and removes the ability of public sector depots to finance capital improvements.
- The RDOS would be willing to reallocate the 25 cent curbside Depot Top Up to increase the Residential Education Top Up. This would level the playing field for private and local government depots. Local governments are already advertising private depots. This additional revenue towards the Education Top Up would further RecycleBC education goals.

Other Issues

- The Residential Education Top-Up is proposed to stay at 75 cents per home per year while the Service Administration Top-Up is being dropped by 65 cents. The RDOS recommends that the 65 cents from Administration reduction be fully invested into the Education Top Up to raise it to \$1.40 per home. Both Canada Post and traditional advertising have significantly raised rates. Freezing the Education Top-Up limits the ability for local governments to reduce contamination, advise residents on what materials can be recycled and communicate on the program in general.

The RDOS supports RecycleBC requirement that the Residential Education Top Up be used solely for promotion and education. One mailout costs more than 75 cents. More money directed at education will benefit RecycleBC.

- Where Green By Nature accepts the use of front end or roll off containers, RDOS Staff may not be permitted to enter the containers to remove contaminants due to enclosed space safety requirements. As such RecycleBC should provide safety allowances in all service contracts where it requests depot Staff remove all visible contaminants as indicated in the Pre-Read Workbook.
- Glass megabags should be segregated and identified. Glass shards are a hazard when embedded in closed mega-bags. Opening the mega-bags can release a cloud of glass at workers. Identifying and re-using the same mega-bags for glass would make it easier for our Staff to undertake safe work procedures.
- The present curbside bonus payment is based on the weight of materials collected per household. The RDOS can show that collection rates are based on average population age not the quality of collection methods. Both the weight of garbage and recycling decreases as population age increase. This is most likely due to the reduction of children living within the household and more frugal people on fixed retirement incomes. The south Okanagan and Similkameen are some of the oldest per capita populations in BC.

The RDOS asks that RecycleBC consider any bonus payments based on criteria applicable to communities with higher than average population age.



Regional District of Central Kootenay

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File No. 6230-20

May 14, 2018

Mr. Allen Langdon
Managing Director
Recycle BC
230-171 Esplanade West
North Vancouver, BC V7M 3J

Dear Allen:

RE: Feedback on Revised Program Plan

The Regional District of Central Kootenay is one of the communities in British Columbia working to come on-board the Recycle BC program for collecting and recycling stewarded printed paper and packaging. The current consultation period and proposed revisions for RBC's program plan are fundamental to the decisions the RDCK makes regarding the future of our recycling programs. As RBC's program plan is completed it is hoped that comments from the RDCK and other districts across BC, whether rural or urban are taken into serious consideration and incorporated to make a plan that can be used as a guide for providing effective recycling service for all residents.

When RBC's revised program was released in late March it was assumed that feedback collected during stakeholder consultation in November 2017 would have been incorporated into new additions to the plan. Many representatives from other regional districts had specific comments regarding operational issues discussed at the consultation. Particularly the introduction of new depot classifications with different rebate incentives for materials collected at curbside was a point of concern for many local governments already participating in the RBC program and would have huge implications for any RD or municipality looking to come on-board. Without clarification on this issue it is impossible to produce accurate budget estimates and long-term projections for operating an RBC recycling program. We would have liked to have seen this issue, as well as others that we raised, addressed in the revised plan.

The draft plan was released late in March and an online presentation and question period was held on April 17. Four weeks later is the deadline for submitting further comments. The Ministry of Environment specifies that plan consultations for stewardship programs are to be given a minimum of 45 days. The minimum period of consultation is often barely adequate to for staff to review changes and potential new service and financial implications. Further, the four week timeframe made presenting a plan to elected officials and soliciting feedback very challenging, and was not possible with pre-scheduled RDCK meeting dates. For a program as widespread and as vital as RBC is for most government's resource recovery services, we found this disappointing.

The revised plan still fails to address the realities of providing recycling services to rural communities. A population threshold of 5,000 to qualify for curbside service would preclude all but one new community in the RDCK from being eligible for this service. Further, this standard only applies to incorporated communities and ignores the potential efficiencies gained by serving residents in surrounding electoral areas. Several electoral areas in the RDCK have populations close to 5,000 and have a majority of households located on or very near major transportation routes. Other communities in the RDCK operate successful curbside collection programs despite having populations below 5,000. Curbside collection guidelines should be reviewed to more accurately reflect the realities of rural communities and municipal borders. If surrounding electoral areas have sufficient populations and densities of



dwellings they should be considered to be added to qualifying communities for curbside collection. If a community can demonstrate that it can operate a cost effective curbside program it should qualify for that service or at least a partial funding based on what curbside collection costs in similar communities even if it does not meet the population threshold proposed.

The standards for depot access from the Stewardship Agencies of British Columbia put forward in this plan do not address the needs of a large number of rural residents. While a 45 minute drive to the nearest depot may be adequate for seldom returned items such as paints and electronics, recycling PPP often requires weekly trips for users. Having depots greater than 30 minute drives away from some communities and located only within larger centres raises several issues. Rural populations of significant size often lack an obvious core. A 45 minute drive for one resident of an electoral area may be an hour or more for another, especially when road conditions are poor. Diverting all PPP to a few depots will create storage and hauling issues at those locations as well. What is required is an approach that takes into account local knowledge about resident behavior and traffic flow as well as local travel conditions to create an effective depot network. At the very least a minimum standard should be based on an actual measured distance.

Appendix A in the plan defines recovery rate to be determined by amount collected vs. amount available for collection. It is unclear if the available for collection value relates to RBC program collectors and depots only or all materials supplied in BC. Considering many rural communities do not meet RBC's eligibility criteria, application of a performance measure considering only RBC program eligible stakeholders does not represent a province-wide 75% recovery. Establishing a standard recovery target for each regional district would immediately address this issue and promote equal service levels for all communities. Additionally, 75% recovery is a minimum target for stewards as outlined in the *Recycling Regulation*. RBC has already claimed to have met this target in its annual reports. While we applaud the achieved target, our concern is that a truly representative performance measure of packaging and paper recovery should consider all materials distributed in the province and serve as a goal to drive increased service and on-boarding new districts.

While the program seems to fit well with larger municipalities, we would like to see actions with measurable outcomes in regards to increasing recovery rates and accessibility across the province, especially in rural communities where these metrics are not in line with the characteristics of our population density. Recycle BC is the most extensive and most well-used EPR program in British Columbia. All residents pay into the program with their daily purchases yet not all receive the same or even comparable service.

The RDCK's rural landscape, like others in the province, simply cannot be forced into the limitations of the current plan while still meeting the needs of residents and the environment. This is resulting in local governments having to tax for recycling services, while those same taxpayers pay a second time when purchasing the products covered by the program. We would like to continue the conversation to find a balance between the competing needs of our communities and the ability for Recycle BC to run a sustainable program. The plan speaks to continuous improvement and we would like to be part of that process.

Sincerely,



Stuart Horn
Chief Administrative Officer

sh/tb

cc: Teresa Conner, Ministry of Environment



Our File No. 5360 04 31

May 14, 2018

Recycle BC
Via Email: consultation@recyclebc.ca

Re: Recycle BC Consultation on Revised Program Plan

The Regional District of Kitimat-Stikine (The Regional District) submits the following in response to the revised Packaging and Paper Product Extended Producer Responsibility Plan prepared by Recycle BC, March 2018.

The Regional District notes that the Revised Plan was created following a consultation event hosted by Recycle BC on November 15 & 16, 2017. A consultation report was published February 28, 2018 acknowledging the comments and feedback generated by stakeholders at the event. While the event and consultation report were seen by the Regional District to be of significant value, very little of the feedback or concerns raised by stakeholders can be seen in the creation of the Revised Plan.

The leading concern for the Regional District remains eligibility to the Curbside Program. The eligibility standards for this program remain restrictive to the point of completely excluding the Regional District as well as a large number of other communities in Northern British Columbia. The eligibility standards include:

1. A curbside garbage collection program was in place by May 2014;
2. The Community represents an incorporated municipality; and
3. The community has a minimum population of 5000 residents.

The Regional District worked diligently to have a garbage collection in place by the May 2014 deadline but was unable to do so. A collection program was in place by November 2014 and the Regional District has been successfully operating a 3-stream (garbage, organics, recycling) residential collection program for the last 2 years. Maintaining the May 2014 deadline as part of the eligibility requirement seem unnecessary and only serves to exclude those communities who have worked hard to raise diversion standards for their residents.



Requiring a community to be an incorporated municipality is an unnecessary requirement which again only serves to further restrict those communities from the Program. Incorporation status should not weigh in the consideration for a community to be enrolled in the Program.

A minimum population requirement of 5000 residents does not seem overly restrictive in and of itself. However, the Regional District proposes some measure of flexibility to this requirement. The Regional District provides collection to over 3600 residents in several smaller communities under the "Greater Terrace" service area but does not include First Nations Communities. A number of smaller, unincorporated communities could combine to attain a reasonable, serviceable level if other standards for eligibility are removed.

The Regional District continues to have concerns related to the standards Recycle BC uses to measure program success. As an example, Recycle BC asserts that 98% of the Province has access to a depot. The measure used is related to driving distance, 30 minutes urban and 45 minutes rural. The Regional District feels that this is not an accurate measure as geographic distance alone should not define "reasonable access". Demographics of the community must be taken into account. Many communities in the Regional District are not served by public transit, many residents do not own vehicles or even have driver's licenses, and a 45 minute driving time likely does not take into account adverse weather conditions or other issues affecting rural travel. The Regional District believes that rather than Provincial measurement standards, the examination should take place at a regional level. The Regional District provided feedback to the Stewardship Association of British Columbia regarding accessibility standards and recommended distances of 10 kilometers for urban settings and 25 kilometers for rural areas.

While the Regional District ultimately wants to be fully included in the Recycle BC Curbside Program, alternate forms of assistance from Recycle BC to serve more remote and rural communities would be welcome. The Regional District has in the past proposed operating satellite collection depots at rural, manned landfill sites. The Regional District would like to transport the collected materials and drop off at the Recycle BC contracted depot, (which is located in the unincorporated community of Thornhill) for processing through Recycle BC. The same depot currently serves as the Recycle BC Depot for the City of Terrace. This proposal represents evolution of the Recycle BC program; bulk drop off of PPP. One party dropping off recyclable materials from 200 households must be recognized as a practical alternative to the same 200 households travelling 45 minutes or more by car to drop off the material individually for inclusion in the same Recycle BC material stream.

Finally, the Regional District would like to see revisions to the Recovery Target standards. Having achieved the previously targeted 75% recovery rate, the Regional District encourages Recycle BC to aggressively pursue higher targets and onboard additional Stewards immediately rather than maintaining the status quo for an additional 5 years.



The Regional District acknowledges the efforts of Recycle BC and applauds the continued advancement in new diversion programs and ambitious pilot programs for orphaned products. While it is noted that Recycle BC takes the position of delivering the Program to those communities which make the most economic sense from a business delivery perspective, the Regional District counters that Recycle BC is ultimately funded by all British Columbians, and, as such all British Columbians deserve access to the program.

The Regional District encourages Recycle BC to carefully weigh the feedback received from Stakeholders and to endeavor to implement real changes to the program which offer value to all British Columbians.

Yours Truly,

A handwritten signature in blue ink, appearing to read "Murray Daly".

Murray Daly
Solid Waste Services Coordinator

Packaging and Paper Product Extended Producer Responsibility Plan

RDN Feedback – May 14, 2018

| | |
|-----------------|---|
| Section: | 2 The Extended Producer Responsibility (EPR) Agency |
| Details: | Recycle BC is acting on behalf of its member businesses who are producers of PPP. Recycle BC aims to be a trusted environment advocate and community partner offering equitable, effective and efficient residential recycling services, and this guides the work Recycle BC does throughout BC. |
| Feedback: | <p>As defined by the Ministry of Environment, EPR is an environmental policy approach whereby the producer is not only responsible for the recycling of the packaging and paper products, but rather the entire life cycle of the product, which includes material selection and package design to reduce environmental impact.</p> <p>Additionally, EPR programs are intended to follow the pollution prevention waste hierarchy which requires actions to be taken in a sequential order, specifically:</p> <ol style="list-style-type: none">1) Reduce the environmental impact of producing the product by eliminating toxic components and increasing energy and resource efficiency; and2) Redesign the product to improve reusability or recyclability. <p>Recycle BC's joint effort with Keurig Canada to address the single use pod is a great success story. Recycle BC should consider a similar strategy to work with producers to achieve ecologically responsible packaging through redesign of product.</p> |
| Recommendation: | <i>Recycle BC should adhere to the Ministry of Environment's EPR approach which requires EPR agencies to follow the pollution prevention waste hierarchy to reduce environmental impact.</i> |

| | |
|-----------------|--|
| Section: | 4.1 Packaging and Paper Product Program Delivery Principles |
| Details: | The Program claims to be driven by one overarching objective – continuous improvement in recovery effectiveness and efficiency in BC. |
| Feedback: | Having already met the 75% recovery rate target as set out in the current PPP plan, with the proposed improvements in recovery effectiveness and efficiency which is generally accompanied by improved outcomes, Recycle BC should consider advancing a recovery rate target relative to the improved efficiency and effectiveness of the program. |

Recommendation: ***Recycle BC should have a recovery rate target beyond the 75% target (as set out by the Ministry of Environment) relative to the improved efficiency and effectiveness of the program.***

Section: 4.3.5 Depot Collection

Details: Depot collection is defined as the collection of PPP at a location operated by a local government or private company in which PPP can be delivered by residents.

Feedback: Provided commercial collectors are able to adhere to the contamination threshold, Recycle BC should consider allowing commercial collectors to access the Recycle BC depot network to take advantage of existing network, as well as improve economy of scale for all network participants.

Recommendation: ***Recycle BC should allow commercial collectors to access the Recycle BC depot network to improve economy of scale for all network participants.***

Section: 5.2 Pollution Prevention Hierarchy

Details: Recover material or energy from the product – research and development to explore ways to recover material that is currently non-recyclable (i.e. multi-laminated plastic packaging).

Feedback: Recycle BC has a strong commitment to recycling and to environmental stewardship, and have stated time and time again, that Recycle BC has “*no plans to direct collect materials nor residual material from the recycling process to a waste-to energy facility*”. The Other Flexible Plastic Packaging pilot program (phase in approach) appears to be contradictory to Recycle BC’s stance on energy recovery from product. Recycle BC should reconsider this program and focus on working with industry on the redesign/selection of materials that lend itself to improve reusability or recyclability.

Recommendation: ***Recycle BC should reconsider the Other Flexible Plastic Packaging program and work with industry to focus on actions (1) an (2) as outlined in the Pollution Prevention Hierarchy:***

- 1) Reduce the environmental impact of producing the product by eliminating toxic components and increasing energy and resource efficiency; and***
- 2) Redesign the product to improve reusability or recyclability.***

Section: 5.3 Reporting

Details: Recycle BC reports on the performance of the PPP program in an annual report submitted to the BC Ministry of Environment and Climate Change Strategy and posted on its website by July 1 each year.

Feedback: In addition to this annual report, Recycle BC has started providing a contamination scorecard which provides insightful information on the state of the program. However, this data is sporadic which makes it difficult to make timely decisions/actions to course correct behavior. Additionally, the 3% non-PPP threshold incentive is tied to the performance.

Recommendation: *Recycle BC should commit to providing timely, regular and transparent reports to allow for programs to make better system decisions to achieve mutually beneficial outcomes.*

Section: Appendix B – Summary of Performance Measures

Details: Introduction of recovery rates for paper, plastic, glass and metal in 2020, and to begin the consultation process on proposed performance targets and measures in preparation for the next 5-year Program Plan.

Feedback: The federal government (through Environment and Climate Change Canada) has already begun the consultation process to engage Canadians on keep plastics within the economy and out of the landfills and the environment. This is a systemic issue that needs to be addressed to increase the reuse and recycle rates of plastics. The current draft plan will not have an enforceable recycling targets for the aforementioned items until 2022.

Recommendation: *Recycle BC should consider an earlier timeline for the introduction and consultation for enforceable plastics recovery rates, as well as detailed reporting commitments for each type of plastic packaging sold into the BC consumer marketplace, and subsequently collected and recycled. The proposed reporting is as follows:*

- *The quantity of plastics supplied by producers in BC, broken down by polymer and package type;*
- *The associated collection and recycling rate by polymer and packaging type (materials consumed in the process of manufacturing); and*
- *Reporting of post-processing quantities of residual plastics or unrecyclable plastics sent to disposal (landfill and energy from waste).*

General Comments (not addressed in the draft plan)

Reporting

- Details: The Recycle BC program and collector averages is currently reported as an arithmetic average.
- Recommendation: ***The Recycle BC program and collector averages should be reported as a geometric mean, rather than an arithmetic average, to provide a meaningful average and to reduce the viability of outliers.***

Financial incentives

- Detail: The current incentive program is set at a 3% threshold for non-PPP; a threshold very few programs have been able to achieve. There is no consideration for collectors/programs that are demonstrating continuous improvement and are nearing the threshold.
- Recommendation: ***Recycle BC should consider a sliding scale with respect to the 3% threshold for non-PPP to incentivize and reward collectors/programs for continued improvements.***
- Detail: Explanation for the determination of material collection rates and assumptions were not provided.
- Recommendation: ***Recycle BC to provide methodology and assumptions for the determination of material collection rates and clarify if inflation is accounted for future years.***
- Detail: As more municipalities are switching to automated collection system, which is geared towards single stream recycling, Recycle BC should take the industry transition to automated collection into consideration when determining financial incentives as industry progress and advancement should be penalized.
- Recommendation: ***Recycle BC to provide their methodology on how they determined a lower incentive rate offered for automated single stream collection.***

From: Alison Taylor <alison_j_taylor@yahoo.com>
Sent: Monday, May 14, 2018 11:58 PM
To: Recycle BC Consultation <consultation@recyclebc.ca>
Cc: ENV.minister@gov.bc.ca
Subject: Feedback on the Revised PPP Program Plan

Current plans for reducing plastic waste are not aggressive enough. We need to act more quickly to preserve ocean wildlife.

RecycleBC's amended plan should commit by January 1, 2019 to annually report to the public and Ministry of Environment on plastics.

This reporting must include the following:

- The quantity of plastics supplied (in kg) by producers into BC, broken down by polymer and package type (e.g. LDPE, HDPE, PP, solid polystyrene, expanded polystyrene foam, PET, multi-laminate plastics, etc.)
- The associated collection and recycling rate by polymer and packaging type (Recycling should be defined as recycled materials consumed in manufacturing of products.)
- Reporting of post-processing quantities of residual plastics or unrecyclable plastics (e.g. plastic laminates) sent to disposal (landfill or energy from waste)

Regards
Alison Taylor
BC Resident and Canadian Citizen
Halfmoon Bay, BC

Recycle BC 2018 Program Plan –Feedback

Packaging Design and Recovery rates

1. Program should be responsible all the packaging that could end up with a consumers regardless of the sector disposing the material.
2. Program should have increasing targets by material type and by RD for all materials (75% is too low). These should increase each year. These high target levels should drive an increase in service options (both depot and curb-side) rather than a reduction of service (presently there is a proposed elimination of some incentives).
3. 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.
4. Higher producer fees need to be issued for the hard to recycle materials to encourage product re-design, disincentivize packaging which has no commercial technology available to recycle at scale
5. Packaging producers and brand owners need to be engaged upon to ensure they understand what's good or bad about their packaging and how they can re-design for recyclability.
6. The program has sufficient experience to now move to the level of fully delivering its mandate in the Recycling Regulation and starting to create best practices for product packaging (re) design.
7. The program should remain true to its commitment provide eliminate or reduce the environmental impact of a product throughout the products life cycle. The environmental impact to collect multi-laminates for burning should be seriously considered. An initial first step would be to instead work on designing them out of the marketplace.

8. The program needs to deliver a comprehensive plan for redesign, reduction and reuse as well as localizing of some packaging. It is no longer adequate to just say individual producers may be doing something. This plan should include education and communication plans for producers as well as clear and sufficient incentives. Targets should be set for refillables and actual packaging reduction (not just light-weighting). The reporting needs to include actions and outcomes on this.
9. 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 behaviour change programs; cup, container and bag exchange programs.
10. 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
11. EPR to change packaging choices of producers – set criteria for production.

Engineered Fuels

12. Question to the claimed of environmental benefit of using the material in lieu of coal combustion. Recycle BC should ensure there is no net increase in air emissions related to alternative fuel; transparency should be maintained on what particulate is in the emissions after burning process. Share environmental and health impact assessments, and epidemiological studies used in decision making to use alternative fuel.

13. Recycle BC to continue to work with suppliers and manufacturers to develop and use packaging that has viable recycling end markets but not only to satisfy an engineered fuel market.
14. 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

Long – Term Plans

15. Program should cover all geographies, not just those that offered a certain service at a certain date or collected a certain weight. These geographies should be set by a committee of local governments along with the provincial government and replace the Stewardship Agencies of British Columbia standard set and used by EPR programs. The service delivery should be equitable.
16. Program should assume full financial responsibility for delivering the services of the program, not just provide incentives (for all curb-side, Multi-Family and Depots, including capital equipment, education and a system for reducing materials). This may include paying different amounts in different communities if a service cannot be offered or contracted for the existing incentive. The determining factor should be the need to deliver the service, not if it the service can be secured at a given rate. Recycle BC should be mandated to deliver the service if a contracted party cannot be found. We would prefer to see an all-in cost recovery structure rather than “top-ups” for education, service administration and depots
17. Program mandate should be driven by delivering outcomes, not by keeping costs low at the expense of service.

Other Requests & Initiatives

18. Recycle BC needs 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 utility recovery.
19. It should be clear on how program data is extracted, and how RecycleBC arrived at the conclusions it did.
20. Develop a recycling program for frequent contaminants such as propane tanks.
21. Institute a bonus incentive for low contamination
22. Create and 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
23. Compare communities with similar dynamics across all data sets to help develop best practices, share knowledge, establish benchmarks.
24. Despite significant education efforts, confusion still exists around items that are recyclable and those that are not. Items that are recyclable but not part of Recycle BC program should not be counted as contamination. Amend program to accept all recyclables, will increase recovery levels and reduce contamination
25. Shift spending from researching hard to recycle plastics but instead increase spending to drive change focusing on what should be allowed out in the market. Recycle BC should use influence as an industry organization to steer manufacturers away from products that contaminate the recycling stream
26. Recovery rate should reflect everything that is recycled comparing to what was released to the marketplace from producers. Clear metrics on how much is recycled, how much is disposed and how much

becomes engineered fuel should be communicated to track circular flow change.

27. Provide amount and composition of PPP recovered in each municipality (i.e. total tonnage collected within municipal boundaries from all depots, from all curb-side, and all multi-family in that city). Will help to understand residential compliance and participation levels and staff planning.
28. Hire ambassadors, province-wide outreach from Recycle BC, similar to BC Hydro. Use summer students to help with inspection programs. Would like "face to face" communications with local groups to educate residents, and providing training directly to them. Training could be schedule ahead of seasonal events that are known to produce large amounts of waste such as Christmas or big online shopping events.
29. There should be a bonus incentive for low contamination
30. Incentive rates should be indexed annually, based on the Consumer Price Index to better reflect the rising costs of collection services
31. The program should be transparent and accountable. Fee rates and finances should remain public even if no visible fees are charged by producers.
32. Program should cover all materials ending up in home-like settings (if a condo is both a home and at times visitor accommodation, it should be covered).

Multi Family

- 33.Reduction in administrative top-up doesn' t recognize work being done by municipalities and requirements for future checking and approval of promotional materials.
34. Consider increased educational top-up per household linked to contamination reductions from multi-family: incentive to do more to get more
- 35.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.
- 36.There should be a system for transparency and accountability for collectors providing service to (MFD) Multi-Family and the particular MFD should receive regular notification to ensure they are not paying for services that are paid for by Recycle BC.

Depot

- 37.Depot EFT reporting: frequency is too high, would rather see monthly reporting
- 38.Re-assess "access to a depot." Many in smaller communities do not have vehicles or public transit. Access to depot should be assessed at a regional level not provincial
- 39.Incentive and baling rates do not cover the cost of depot operations including insurance, sorting materials, or providing staff oversight.
- 40.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."

41. Many in smaller communities do not have vehicles or public transit. Access to depot should be assessed at a regional level not provincial.

Streetscape

42. Streetscape services should be delivered to all locations covered by the regulation (not the smaller subset in the plan, fully funded by the program and with a long term plan to get it to a suitable contamination level.
43. 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.
44. The proposed incentives are far too insufficient and will not cover the cost of PPP collection from streetscapes, or administrative efforts.
45. Communities should be able to determine what waste stream should be collected at each streetscape location, and how bin systems are configured.
46. Organics or Compostable waste stream should be included in Streetscape design criteria to keep the contamination due to disposed liquids of other waste streams low.
47. Recycle BC should work with local governments to determine an approach to developing a streetscapes program.
48. Recommend an incentive amount per capita or equivalent.
49. Yearly audits should be funded by Recycle BC
50. Collaborate and support municipalities already executing programs. Collect and integrate those waste stream audits to learn from those findings.

51. Program 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. A key aspect should be reducing streetscape materials by funding single use item reduction strategies.

Provincial considerations

52. Province should tighten requirements in regulation and in approving plan as above.

53. Province should consider fines for not meeting targets.

54. Province should work with local governments to set a fair plan for service delivery locations for all EPR programs (improve upon the Stewardship Agencies of British Columbia model).

55. 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.

56. 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.



Retail Council of Canada



Conseil canadien du commerce de détail

Retail Council of Canada
Conseil canadien du commerce de détail

410-890 West Pender Street
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Telephone +1 (604) 736-0368
www.retailcouncil.org

14 May 2018

Recycle BC
230-171 Esplanade West
North Vancouver, BC V7M 3J9

By electronic mail

Dear Recycle BC,

Retail is both Canada's and British Columbia's largest private-sector employer with over 360,000 British Columbians (May 2017) working in the retail and wholesale trade alone. The sector generated payroll over \$10 billion (2016) and \$84 billion in sales (2017) in British Columbia. Retail Council of Canada (RCC) members represent more than two-thirds of retail sales in the country. RCC is a not-for-profit industry-funded association and represents small, medium and large retail business in every community across the country. As the Voice of Retail in Canada, we proudly represent more than 45,000 storefronts in all retail formats, including department, grocery, specialty, discount, independent retailers and on-line merchants.

Thank you for the opportunity to provide comment on Recycle BC's revised Packaging and Paper Product (PPP) Extended Producer Responsibility (EPR) plan created in March 2018.

The retail industry had a key role in the creation of what has evolved into Recycle BC and we are pleased by its early work and growth. Recycle BC provides the significant majority of blue box services to British Columbians.

Despite the significant disruption in the end-markets for recyclable material, British Columbia's local government and private sector recycling industry have been insulated from the cost impacts of the disruption due to the work of Recycle BC – and more of British Columbia's material is being managed responsibly with a better environmental outcome.

Recycle BC is also meeting the challenge of the streetscape working with municipal parties to identify ways of ensuring that streetscape materials are collected in a manner that will ensure both strong outcomes and the cleanest possible stream of streetscape materials.

The process to build the strongest outcomes will take significant time and very significant investments. We encourage other stakeholders to remain patient and to focus on providing the best environmental results for British Columbians.

RCC members are supportive of the good intentions seen in many stakeholder submissions to the Recycle BC consultation process. But we note that there are still many unknowns – for example:

- what will be the result of increased remittances due to materials added to the PPP regime in

- fall 2017;
- what will be the financial impact of the changes to market values of end-market materials; and,
 - what will be the cumulative impact of the many small improvements Recycle BC continues to make to its program.

The retail industry urges the regulator to proceed carefully and not to inadvertently cause consumer costs to dramatically increase, or the program to experience undue operational or financial risks.

The retail industry is pleased to play its part. However, our view is that the only justification for increasing costs and operational complexity is to provide better outcomes. The Province should only consider expensive and complex changes where it is possible to create better environmental outcomes. British Columbia is a small market and accordingly it would be more effective, less costly and less of an administrative burden if the Province worked with other Canadian jurisdictions to harmonize reporting and remitting requirements.

Breaking down the quantity of plastics by polymer and package type supplied into the residential market, as at least one organization is advocating for, would dramatically increase the cost and operational complexity of the PPP program. Those costs are passed along to consumers and, therefore, this would reduce the affordability of goods purchased by consumers.

Retailers, obligated under the Recycling Regulation, do not typically have access to detailed information about packaging. The system will be providing yet another advantage to retailers who purchase from larger suppliers who are equipped to be voluntary registrants.

Breaking down the polymer and package type at recovery will also increase operational costs for Recycle BC. Accordingly, this should only be done when a better outcome can be achieved for one type of material versus another.

In the event that a requirement to report and remit by polymer and package type were to be added, it will take producers at least 18 to 24 months to change their operational processes to be able to provide such information. Accordingly, such a change should not be made until at least 18 months following the approval of the plan.

We support Recycle BC's revised stewardship plan and urge the Province to approve the revised plan. Thank you.

Yours truly,



Greg Wilson
Director of Government Relations (B.C.)



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May 14, 2018

Allen Langdon
Managing Director, Recycle BC
230-171 Esplanade West
North Vancouver, BC, V7M 3J9

Re: 2018 Consultation Feedback

Dear Mr. Langdon,

The SLRD would like to thank Recycle BC for the opportunity to provide feedback on the proposed changes to the printed-paper and packaging stewardship program. As most of the proposals in Recycle BC's Packaging and Paper Product Extended Producer Responsibility Plan (dated March 2018) are unchanged from those presented during the November 2017 consultation event, the written feedback submitted on December 15, 2017, is attached to this response.

Below are our responses to the particular proposals, as itemized in the March 2018 stewardship plan.

3.3 Sources of Packaging and Paper Product

As mentioned in the attached response from December 15, 2017, the SLRD would support the inclusion of ICI PPP materials in the Recycle BC program. Recycling in rural areas and small communities is often difficult for businesses due to smaller economies of scale and limited, or no, service providers that offer collection, processing, and hauling.

4.3 Collection of Packaging and Paper Product from Residents and Streetscapes

As mentioned in the attached response from December 15, 2017, the SLRD does not support Recycle BC's proposed criteria for new curbside programs (section 4.3.2). The SLRD feels that Recycle BC should enroll curbside programs established after 2014, regardless of the population, or whether the service is within an incorporated municipality.

Appendix B – Summary of Performance Measures

The SLRD would support a recovery rate target greater than 75% now that Recycle BC is entering into its second stewardship plan and has already reached this target under the existing plan. Alternatively, a ratcheting system whereby the recovery rate target was increased year over year for the duration of the plan would also be favourable to maintaining the existing target.

Under Accessibility Performance, the SLRD does not support “maintaining a minimum of 200 depots across BC” as the target for the duration of the plan. We would prefer that this be expanded to encompass all depots in BC and/or the provision of a timeline for the enrollment of depots not currently part of Recycle BC.

The SLRD supports the inclusion of greenhouse gas monitoring in Recycle BC’s reporting metrics. At a minimum, this information should be tabulated for each regional district. The ability to provide emissions data for each depot, curbside service, or streetscape program would also be beneficial.

Additional Feedback

- The SLRD would like to see a commitment to enrolling all depots and curbside services that are not currently part of Recycle BC. This should include committed timelines for enrolling waitlisted services and depots over Recycle BC’s five-year stewardship plan.
- To reiterate the feedback provided in the attached response from December 15, 2017, the SLRD would not support changes to the depot incentives program that results in a loss or reduction of financial incentives for depots in areas with curbside services.

Should you have any questions or comments on the above feedback, please do not hesitate to contact myself.

Sincerely,



Marc Sole
Utilities and Environmental Services Coordinator
msole@slrd.bc.ca
604-894-6371 ext. 236



Box 219, 1350 Aster Street
Pemberton, BC V0N 2L0
P. 604-894-6371 TF. 800-298-7753
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December 15, 2017

Allen Langdon
Managing Director, Recycle BC
230-171 Esplanade West
North Vancouver, BC, V7M 3J9

Re: 2017 Consultation Feedback

Dear Mr. Langdon,

The SLRD would like to thank Recycle BC for the opportunity to provide feedback on the proposed changes to the printed paper and packaging stewardship program. Below are our responses to the particular proposals, as itemized in the consultation pre-read workbook.

Depot Collection

Provide Recycle BC with the right to require collected material be stored in such a way that material quality is not impacted by inclement weather, such as rain and snow.

The SLRD would support the creation of a funding mechanism to cover the full cost of meeting this requirement. The SLRD has already made significant investments in depot infrastructure to meet the requirements of each SOW. At present, the incentives from Recycle BC do not adequately fund recycling infrastructure investments after regular operating costs have been deducted.

Categorization of depots (Type 1-3).

The SLRD does not support the categorization of depots into classes that may result in reduced incentive payments. Incentives should be paid based on the weight of material collected, rather than perceived populations served or the existence of other Recycle BC programs in the community. Recycle BC's mandate is to collect its program materials; it should not be dictating how solid waste services are provided to communities by altering the financial consequences of particular services to favour one over the other.

Thoughts/suggestions:

- Rather than attempting to control local government incentive payments, depot signage, education campaigns, depot staff/contractors, and depot infrastructure for material storage, Recycle BC could instigate a complete takeover of depot PPP recycling operations. Local governments could lease Recycle BC space at depots and the program could provide the necessary infrastructure, staffing, and public education campaigns at full cost to PPP producers.

Research and Development: Multi-laminated Plastics

The SLRD supports the addition of packaging materials not currently collected to the Recycle BC program. However, the SLRD does not believe that the pollution prevention hierarchy, as outlined in section 3 of the *Recycling Regulation*, has been adequately explored for this product category. Namely, redesigning the product to improve reusability or recyclability before energy recovery. We understand the challenges involved in altering global supply chains, and the benefits of multi-laminated packaging (greater product shelf life, reduced space requirements/increased transportation efficiency, etc.), but the SLRD would like to see greater efforts from Recycle BC to lobby change within the industry. Alternatively, Recycle BC could penalize producers using multi-laminated packaging, and other hard to recycle materials, by charging much (i.e. prohibitively) higher program fees. The additional revenue could be put towards research into effectively redesigning/recycling this material.

Program Plan

New Curbside Programs

The SLRD does not support the criteria for new curbside programs. Recycle BC's mandate is to collect its program materials, not dictate which solid waste services are provided to a community. If an unincorporated community of less than 5,000 people decides to implement curbside collection at some point in the future, Recycle BC should be required to incentivize and collect its program materials. Restrictions on which services/depots can join Recycle BC have financial consequences that effect decision making; reducing the freedom of citizens to choose their own solid waste services, and effectively placing these decisions in the hands of an unelected body established by industry.

Additional Feedback

- Recycle BC should provide a committed timeline for the onboarding of all depots and curbside programs on its waitlist. This would assist local government planning processes for infrastructure and service investments, contract management, and budgeting.
- The SLRD would support the inclusion of ICI PPP materials in the Recycle BC program. We understand the difficulty in undoing/changing existing ICI recycling pathways; however, the inclusion of this material in the Recycle BC program would streamline collection and consolidation operations at depots. The inclusion of ICI material would also make recycling easier for small businesses, by providing access to recycling at every Recycle BC depot or curbside program, which may increase diversion rates.

Should you have any questions or comments on the above feedback, please do not hesitate to contact myself.

Sincerely,



Marc Sole
Utilities and Environmental Services Coordinator

msole@slrd.bc.ca
604-894-6371 ext. 236

From: Linda Nowlan <Linda_Nowlan@wcel.org>
Sent: Monday, May 7, 2018 2:42 PM
To: Recycle BC Consultation <consultation@recyclebc.ca>
Subject: Feedback on the Revised PPP Program Plan

Dear Consultation on Revised PPP Program Plan:
We would like to submit this feedback:

The current PPP Plan (approved by the BC Ministry of the Environment on April 15, 2013) has a target of collecting 75% of all materials (metals, paper, plastics, glass). The [revised stewardship plan for PPP](#) submitted by RecycleBC proposes to introduce recovery rate reporting for paper, plastic, glass, and metal in 2020 – to assess current recovery rates and potential new targets – and would only start consulting on enforceable targets in 2021.

So under the current proposal, there will be no reporting on aggregate plastic waste recovery for more than a year and no enforceable waste recovery targets for the balance of the three-year life of the amended plan, as RecycleBC conducts consultation.

As a result there will likely be no enforceable recycling targets for at least another five years!

Critically, the amended plan does not propose any reporting on plastic recycling by plastics type.

This is wholly inadequate given that the RecycleBC program has already been in operation for five years, has developed [more capacity](#) for plastics recycling within the province and exports no plastics for recycling.

We urge you to act to make this plan stronger.

We submit that RecycleBC's amended plan should commit by January 1, 2019 to annually report to the public and Ministry of Environment on plastics. This reporting must include the following:

- The quantity of plastics supplied (in kg) by producers into BC, broken down by polymer and package type (e.g. LDPE, HDPE, PP, solid polystyrene, expanded polystyrene foam, PET, multi-laminate plastics, etc.)
- The associated collection and recycling rate by polymer and packaging type (Recycling should be defined as recycled materials consumed in manufacturing of products.)
- Reporting of post-processing quantities of residual plastics or unrecyclable plastics (e.g. plastic laminates) sent to disposal (landfill or energy from waste)

Importantly, the amended plan should commit to a 70% plastics recycling rate (not collection rate) by 2020.

In the UK, public concern about plastic waste is at an all-time high thanks to the TV program [Blue Planet](#), which showed the horrifying impacts of plastic on sea life. In response the [UK government has committed to introduce a deposit-refund system for beverage containers](#) (something BC already has).

Working with the UK Waste and Resources Action Programme, retailers and producers have voluntarily pledged through a [Plastics Pact](#) to reduce plastics and recycle 70% of their plastic packaging by 2025. However, these same retailers and producers refuse to tell the public how much plastic packaging they are responsible for and are being [roasted](#) for this secrecy.

Given BC's head start in Extended Producer Responsibility, the province must do better. A key next step in reducing waste is to set ambitious targets for recycling, and provide British Columbians with transparency on the amounts of plastic sold into the province and what is actually collected and recycled. The amended PPP plan for BC as drafted today misses this mark.

A longer version of this submission is posted on our blog: <https://www.wcel.org/blog/have-your-say-plastic-waste-management-in-bc>

Yours truly,

Linda Nowlan

Staff Lawyer | West Coast Environmental Law
200-2006 West 10th Ave, Vancouver, BC V6J 2B3 | Coast Salish Territories
x^wməθk^wəy̓əm (Musqueam), S_kwx̣wú7mesh (Squamish) & səliłwətaʔt (Tsleil-Waututh)

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NEWS FROM WEST COAST ON [OUR BLOG](#), [FACEBOOK](#) AND [TWITTER](#)

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May 14, 2018

**WMABC Provides Comments on
Recycle BC's Packaging and Paper Product Extended Producer Responsibility Plan**

On behalf of the Waste Management Association of British Columbia (WMABC), we have reviewed your report - Packaging and Paper Product Extended Producer Responsibility Plan (Plan) – and offer the following comments.

By way of background, for over 30 years the WMABC has provided a forum for and advocated on behalf of British Columbia's (BC) private sector waste services industry. The Association is comprised of 70-member companies in the areas of waste and recycling collection and transfer, recycling processing and disposal operations, material marketers and industry suppliers and account for over 3,000 waste management professionals that provide most of the waste services within the province.

Our primary concern is the failure of Recycle BC (formerly MMBC) to acknowledge the issue of competition within the Plan as per the B.C. Auditor General's Report - Product Stewardship: An Overview of Recycling in British Columbia – in November 2016. In said report, the Auditor General highlighted:

"We were told by some stakeholders that it is unlikely producers can collect and recycle their products themselves because of the technical and logistical challenges they would have doing this province-wide for a single product. Some stakeholders we spoke with also expressed concern that without competition for recovering and recycling PPP, MMBC has few incentives to ensure their operations are efficient.

The ministry told us that approving additional stewardship plans for a single product category could have unintended consequences for existing plans. The ministry is concerned that competition could make stewardship agencies less viable and reduce overall recovery rates. The ministry expressed this concern in its review of the StewardChoice plan, stating that ministry staff will "undertake significant policy work to fully assess how competitive stewardship plans within a single extended producer responsibility product category should be administered ... prior to the approval of new competing plans."

The Auditor General also stated:

"The ministry has contracted with third-party contractors Glenda Gies and Associates and Corporate Policy Group LLP to examine competition in other jurisdictions and identify best practices for the B.C. context. The first phase of this work, a jurisdictional scan, was delivered to the ministry in March 2016. The second phase of this work, which will provide recommendations for best practice, is ongoing. We are encouraged that the ministry has taken steps to address stewardship competition within product categories. We look forward to seeing the ministry's approach to implementing best practices."

We understand from a joint presentation by the Ministry of the Environment, Glenda Gies and Associates and Corporate Policy Group LLP at the Recycling Council of BC's annual meeting on June 22, 2017 that further work on phase two of the

report required further analysis and that the Ministry of Environment would be updating stakeholders. We are unsure of the whether this analysis was provided.

The WMABC is supportive of the updating and modernization of recycling regulations. However, the WMABC was not meaningfully engaged nor consulted on the potential amendments to the Plan. We would respectfully suggest that a greater effort be placed on the inclusion of the private waste services industry in the review and development of future provincial product stewardship programs given its dominant presence serving both municipalities and including multi-family buildings. To that end, we will endeavor to be more proactive on our participation in future public consultations.

In summary, British Columbia would be well served by an open and competitive market that encourages the introduction of innovative technologies that helps de-risk private sector investments as well as reduces the likelihood of unintended consequences of ill-conceived diversion programs.

We would welcome an opportunity to meet with Recycle BC to discuss our issues and maintain a proactive dialogue.

Sincerely,



Noel Massey
President

cc. Lori Bryan, Executive Director, WMABC
Carol Bellringer, Auditor General
David Morell, Assistant Deputy Minister, Ministry of Environment

April 2018 Consultation - Online Form Feedback Submissions

| First Name | Last Name | Title | Organization | Email | Sector | Feedback |
|------------|--------------|--|------------------------------------|----------------------------|-----------------------------|---|
| Andrew | Kirker | Mr | Home owner | awkirker@gmail.com | other | The current blue bins are too small. Most households fill more than one with spillover. I would suggest moving to a bin that is similar size to the garbage bin or compost bins. This is what other municipalities have done. The hope is to have the same amount or more being recycled compared to garage so we should provide the space for this. Expecting people to put out 3-5 bins is cumbersome. |
| Lisa | Burt | Mts | Prairie Valley Lodge | priievalleylodge@gmail.com | private-sector-organization | Would like to see the recycling program in Summerland simplified. A solution to this would be to re locate the recycling depot back into the centre of town, where it is more convenient for everyone to participate in the recycling program. The Summerland landfill is too far out of town for seniors, requiring a vehicle be used on a rough road. |
| Deb | Burchinshaw | Mrs. | Self-Employed | lesterbur@hotmail.com | other | Summerland, BC is a retirement mecca, many of the elderly don't drive. We all work hard on putting the correct items in our weekly recycle for pick-up, but some items are not allowed and therefore must be taken over 5 km to the local landfill recycle. It would be nice to have some glass bins and cardboard bins closer to the town so everyone can do their part. |
| Jolene | Palmer | Ms. | Prairie Valley Christmas Trees | jolene@telus.net | other | Soft plastics (bags), styrofoam, and glass cannot be recycled in our Summerland BC program. These items make up a large portion of recyclable waste. They should be included. Also, not everyone has the ability or vehicle to make it to our landfill to recycle this stuff. We used to have a downtown recycle centre. Ideally, these items should be incorporated into the recycling program. |
| Ben | Van Nostrand | Team Leader, Environmental Health Services | Columbia Shuswap Regional District | bvannostrand@csrd.bc.ca | local-government | I'm disappointed in the lack of measurable targets and goals for the future. The performance measures are vague at best and clearly aren't meant to hold the steward accountable. There doesn't appear to be much language around how RBC will show leadership to ensure communities not receiving service for multi-family or curbside collection, will eventually be included in the program. Either the Ministry or RBC should be responsible for conducting outreach to local government staff and providing information on steps required to receive service. I would argue that many at the local government level have poor understanding of programs/services offered by RBC. I recently engaged in an audit of our Depot program via Glenn Williams (Williams Accounting) and shared with him that the costs associated with delivering the RBC Depot program is approximately \$500,000/year. True stewardship and industry accountability should result in a program that doesn't bear such significant costs to local governments. There is no mention of these costs in the Program Review.....is it just assumed that local governments will continue to bear the costs of implementing the RBC program? |
| Sharon | Song | Accounting/Admin | InnoFoods INC | sharon.song@innofoods.ca | producer | The whole process was little bit complicated, but we got well assisted by company. Thank you. |
| Jennifer I | Sullivan | Miss | SAAQ | gonet1@telus.net | other | Your amended plan should commit by January 1, 2019 to annually report to the public and Ministry of Environment on plastics. This reporting must include the following: <ul style="list-style-type: none"> - The quantity of plastics supplied (in kg) by producers into BC, broken down by polymer and package type (e.g. LDPE, HDPE, PP, solid polystyrene, expanded polystyrene foam, PET, multi-laminate plastics, etc.) -The associated collection and recycling rate by polymer and packaging type (Recycling should be defined as recycled materials consumed in manufacturing of products.) -Reporting of post-processing quantities of residual plastics or unrecyclable plastics (e.g. plastic laminates) sent to disposal (landfill or energy from waste) -Importantly, the amended plan should commit to a 70% plastics recycling rate (not collection rate) by 2020. <p>In the UK, public concern about plastic waste is at an all-time high thanks to the TV program Blue Planet, which showed the horrifying impacts of plastic on sea life. In response the UK government has committed to introduce a deposit-refund system for beverage containers (something BC already has).</p> <p>Working with the UK Waste and Resources Action Programme, retailers and producers have voluntarily pledged through a Plastics Pact to reduce plastics and recycle 70% of their plastic packaging by 2025. However, these same retailers and producers refuse to tell the public how much plastic packaging they are responsible for and are being roasted for this secrecy.</p> <p>Given BC's head start in Extended Producer Responsibility, the province must do better. A key next step in reducing waste is to set ambitious targets for recycling, and provide British Columbians with transparency on the amounts of plastic sold into the province and what is actually collected and recycled. Your amended PPP plan for BC as drafted today misses this mark.</p> |
| Laurie | Kallio | Regional contracts officer | Nwcc | laurielynnkallio@gmail.com | service-provider | For the health of all citizens we need to take a stand and action now on plastic waste reduction and reporting....what exactly are we waiting for?! |
| Jen | Rustemeyer | Citizen | Bc | jenrustemeyer@gmail.com | other | Im writing to encourage RecycleBC's members to commit by January 1, 2019 to annually report to the public and Ministry of Environment on plastics. This reporting should include the following: <ol style="list-style-type: none"> 1. The quantity of plastics supplied (in kg) by producers into BC, broken down by polymer and package type (e.g. LDPE, HDPE, PP, solid polystyrene, expanded polystyrene foam, PET, multi-laminate plastics, etc.) 2. The associated collection and recycling rate by polymer and packaging type (Recycling should be defined as recycled materials consumed in manufacturing of products.) 3. Reporting of post-processing quantities of residual plastics or unrecyclable plastics (e.g. plastic laminates) sent to disposal (landfill or energy from waste) <p>Let's see more transparency and more real recycling! Thanks, Jen</p> |

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|--------------------|-----------|---|----------------------------------|-----------------------------|-----------------------------|---|
| Andrew | McGifford | Senior Manager of Como Strathcona Waste Management Services | Comox Valley Regional District | amcgifford@comoxvalleyrd.ca | local-government | <p>Depot Incentives - The proposed removal of depot incentives for local governments that have curbside in the communities should not be considered. In the smaller communities and rural areas the value of the incentives provide a minor contribution for the depot programs to offset costs. Every little revenue stream is import to these communities. Often smaller communities subsidize the depot stewardship programs to ensure the diversion of the products are present in the smaller communities and rural areas. These are not money making activities.</p> <p>In the Comox Strathcona Solid Waste service there are many in the rural areas that use the Recycle BC depots. There is only one rural area with curbside recycle service in the CSWM service – Royston.</p> <p>The removal could be detrimental to the diversion goals in some areas should this change occur. Councils and boards may be put into a position where increased taxation has to occur to continue the level of service currently provided. I strongly oppose this change.</p> <p>Small communities and rural areas – Flexibility is required small communities and rural BC. The program is not a one solution fits all and would hope that the staff at Recycle BC are provided the ability to enable solutions that fit each area and still maintain the desired outcomes of the Recycle BC mandate.</p> <p>Where there is no business case for ICI materials to be diverted, Recycle BC should be able to facilitate a fair program that increases diversion. Recycle BC should investigate a model to address this gap and increase diversion.</p> <p>funding support new curbside programs - preapproval - if there are currently areas that are not serviced, could there be a preapproval process to include an area? The CVRD is looking at providing rural areas that are not currently serviced (garbage, recycling or organics). If we could provide the public information and commitment that the rural area could see a subsidy from Recycle BC for the recycling service it could assist in our communications to the residents if we have a referendum.</p> |
| Tai | Uhlmann | Educator | Let's Talk Trash | tai.uhlmann@gmail.com | local-government | <p>Here is feedback to the final RBC plan from the Let's Talk Trash team/Powell River Regional District.</p> <p>Our concerns are outlined below :</p> <p>-Recycle BC indicated that comments made during the November consultation session would be utilized in order to improve upon or change the draft program plan published in April of this year. Little if any information gathered during the November consultation was utilized in the draft plan. Stakeholders are unable to determine the implications to their programs by reading the draft program plan.</p> <p>-Need clarity on methodology for the setting of incentive rates for materials collected and if the rates increase to meet inflation</p> <p>-There is a lack of information in the plan needed to make operations contracts and planning longer than 5 years into the future.</p> <p>-Need clarity/decision on the proposed changes to depot operations and incentives in certain areas. For example not including container and fibre streams at depots in areas serviced by curbside.</p> <p>Single stream collection has a lower incentive rate offered but it is also subject to the same contamination fines as other collection methods.</p> <p>Recovery Rate – Is 75% recovery actually a reasonable target for the next five years considering RBC have already reached this target? Should RBC not be showing continuous improvement by raising the target recovery rate?</p> <p>RecycleBC's amended plan should commit by January 1, 2019 to annually report to the public and Ministry of Environment on plastics. This reporting must include the following:</p> <p>The quantity of plastics supplied (in kg) by producers into BC, broken down by polymer and package type (e.g. LDPE, HDPE, PP, solid polystyrene, expanded polystyrene foam, PET, multi-laminate plastics, etc.)</p> <p>The associated collection and recycling rate by polymer and packaging type (Recycling should be defined as recycled materials consumed in manufacturing of products.)</p> <p>Reporting of post-processing quantities of residual plastics or unrecyclable plastics (e.g. plastic laminates) sent to disposal (landfill or energy from waste)</p> <p>Thank you for your time and consideration</p> |
| Andrew (Byeongsoo) | Kim | owner | Lee's bottle depot | leesbottledepot@gmail.com | other | I agree and follow the rules. |
| Clare | Cassan | Owner | Columbia Bottle Ent. Ltd. | rccassan@columbiabottle.com | service-provider | Thanks for this opportunity. Currently, Recycle BC isn't paying their fare share of our costs and operating expenses. In fact, they are riding on the back of some of our other Stewardship agreements. It's time they paid their way for the space and manpower their program requires. |
| Kait | Burgan | Producer | SeaLegacy | kait@sealegacy.org | not-for-profit-organization | Plastic pollution is one of the most urgent threats to our environment, and one that can be addressed with pro-active solutions and quick response. Recycling at a consumer level is one of the most relied upon methods that individuals take to have a positive impact on the environment. Citizens need to know that what happens after they take their bins and bags to the curb, that policies are in place to ensure it's actually making a difference. |
| Al | Varty | Mr. | None | alvarty@gmail.com | other | <p>The recycling system in bc is pathetic. When retailers will only take empties of products they sell. So if I go to a different store they won't take my plastic bottles. Now I would have to drive back to the original store to return them. Wasting gasoline and time.</p> <p>Also why are pop cans 5 cent deposit and beer cans 10 cents? They are the same can. More sorting and more different stores to go to. Also non store brands won't be accepted again.</p> <p>And plastics. Products that are packaged in non recyclable containers should be banned. And then all plastics can go into the recycling system and not into the landfill. I hope something is done to fix the broken system we have now.</p> |
| Janette | Loveys | Chief Administrative Officer | Sunshine Coast Regional District | janette.loveys@scrd.ca | local-government | <p>-That unincorporated areas be eligible to join Recycle BC's program.</p> <p>-Seeking clarification that the Sunshine Coast Regional District's Electoral Areas B, D, E and F are eligible to join Recycle BC's curbside collection program.</p> <p>-Consideration that rural</p> |

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|---------|----------|--|-----------------------------------|--|-----------------------------|--|
| Shannon | Erickson | Environmental Stewardship and Compliance | Staples Canada | shannon.erickson@staples.ca | producer | <p>Dear Recycle BC,</p> <p>Thank you for the opportunity to provide feedback on the updated BC Recycle Program Plan. I do not believe we had the opportunity to participate in the initial consultation that happened in November 2017. We see that only 2 steward members were present, which concerns us. From the report it had been indicated that more Producer presence would have been helpful in those sessions, which we would also agree with. We would welcome a greater understanding of the selection of participants for the initial consultation.</p> <p>We do have some points of feedback we would like to share as part of the consultation plan and discussion that took place as part of the webinar.</p> <ul style="list-style-type: none"> •It appears that the proposal plan seems to be focused more towards municipalities and processors, as was the presentation on April 17th. •A question and response indicated that any existing contractors would retain their existing contracts. Can you please clarify the process for RFP to ensure the best contracts are awarded? As a producer in an EPR system, we want to ensure costs are kept low, and that there is accountability and transparency to ensure the contracts are awarded in the best responsibility of cost, not just because someone previously held a contract. •Contamination is costly on the Recycling systems. We are concerned that curbside sorting is the only way consumers are informed about recycling incorrectly. While we appreciate that some effort is being taken to improve the quality of what consumers recycle, this seems to be a time consuming and costly way to inform consumers. •We would like to see a more clearly communicated education plan to improve the quality of recycling materials consumers put into the system. Social media was communicated as a primary tool. While this can be an effective tool, it should not be the only tool as it is not wide spread. Most of the social media campaigns I have observed have been more promotion of recycling, rather than educational. With the newspaper in-kind program, we would also like to see clearly how this can be used for education as well. •We observed discussion regarding harmonized packaging. This only works if it is truly harmonized. <p>We do appreciate the work that Recycle BC does, and desire to continue to partnership with you and the CSSA where we can to help improve the systems and processes for all.</p> <p>Regards, Shannon Erickson Environmental Stewardship and Compliance Staples Canada</p> |
| Chloe | Boyle | Environmental Technologist 1 | Cowichan Valley Regional District | cboyle@cvrd.bc.ca | local-government | <p>(1) The Recycle BC Plan should include a target to cover all financial costs for delivering the services of the program in all areas. Currently the program plan favours urban areas, which are denser and so have lower collection costs. With the proposal of increased incentives for multi-stream collection, urban areas will be further privileged, as in many rural areas multi-stream collection is economically unfeasible. If multi-stream collection is incentivized, Recycle BC should also cover the extra costs in rural areas of providing this collection.</p> <p>(2) The Recycle BC Plan should include a program or initiative to increase the recycled content used in local packaging, to ensure that the full life-cycle of packaging is being taken into consideration, thereby 'closing the loop'. Recycle BC should provide economic incentives for producers that use packaging that is created from recycled materials, and could provide a structure that further increases the local markets and industry in BC. The initiative should include targets and indicators, and report progress on increasing the content of local recycled material within local packaging.</p> <p>(3) The Recycle BC Plan should include a program or initiative to increase the return-to-retail locations. Recycle BC should not wait for retailers to approach Recycle BC, but rather actively take responsibility for increasing the number of locations that residents can recycle packaging. The program or initiative should include a target for number of retailers to include in the program, along with indicators and report on progress.</p> <p>(4) The Recycle BC Plan should include an over-arching community-based social marketing strategy for addressing contamination issues. Behaviour change requires more than social media videos and pictures, but an analysis of the barriers and motivations to recycling the correct material at curbside and at depots. Current educational materials provided are still confusing to residents (e.g. depot flyers and promotion does not distinguish that certain materials are not accepted at curbside). Part of this plan should include additional funding for education and outreach, which is clearly needed, as contamination issues are common across BC. Grants or staff resources should be provided to assist communities facing continued contamination issues. A separate communications plan should be available for comment.</p> <p>(5) Recycle BC should provide all contractors with any collected quantitative data, to ensure that contractors are making decisions based on the best available information.</p> <p>(a) Operational effectiveness indicators should include contamination data, as Recycle BC is also responsible for communication and education around contamination issues.</p> <p>(b) Recovery rates should be segregated by material type if Recycle BC has that information.</p> <p>(c) The collection and diversion rates should be reported on a regional basis per regional district to allow districts to make informed decisions.</p> <p>(d) Data on the top contaminants should be reported to the province and provided to contractors.</p> |
| Richard | Aikema | Director of Facilities | Abbotsford Community Services | richardaikema@abbotsfordcommunityservices.com | not-for-profit-organization | <p>same feedback as last time:</p> <p>Taking glass and film out of the curbside program is regressive. i understand the intent but that should not be the public's problem. This problem only gets worse now that more people choose not to have cars and for seniors (for example) this may have become and unnecessary barrier. Film and glass are 100% recyclable - the fact that you don't like taking it curbside for operational reasons, should not present the inconvenience (barriers) to the public. It's confusing to the public and inconvenient. You are asking the public to accept the additional cost and inconvenience where there are mechanical solutions</p> |
| Elina | Falck | Owner-Clinical Counsellor | Oceanside Therapy | elina@oceansidetherapy.ca | private-sector-organization | <p>We need to be extremely aggressive in recycling plastics, and reducing the use of plastics.</p> |

| | | | | | |
|-------|-------|---------------------|----------------|--|--|
| Harry | Janda | Solid Waste Manager | City of Surrey | hsjanda@surrey.ca | <p>local-government</p> <p>At the November consultation, Recycle BC proposed to increase the incentive rates based on collector collection programs and exercise its right to develop a methodology to net out non-packaging and printed paper and commingled glass from calculation of capture rate when calculating applicable bonus payments. However, we have not received any feedback from Recycle-BC on their approach which leads us to the inability to submit more formalized comments regarding the plan.</p> <p>1. The proposed incentive rates for single stream collectors using automated carts has been increased by approximately 4% for curbside and 8% for multi-family, which is lower than other curbside groups given the lower ongoing collection cost associated with automated cart-based systems and the high levels of contamination typically found in these systems. Furthermore, Recycle BC is proposing to provide a higher service administration top up rate to those local governments and First Nations that operate curbside recycling programs using local government or First Nations employees as collection staff, compared to those that contract collection services to an external service provider, given the increased administrative costs associated with managing internal collection employees. Our concerns are as follows:</p> <ul style="list-style-type: none"> - Contamination is covered through a separate mechanism in the contract (penalties) which seems that Recycle-BC is doubling dipping through lowering single-stream incentives and performance bonuses; - Need to consider general inflation costs, mobility or transportation inflation or flexibility to include new mobility costs - There is still an additional cost component for maintenance of automated carts; - There are still significant contract administration costs which include overseeing day-to-day contract operations, processing progress payments, cart management, customer service, addressing collection failures. <p>2. Recycle BC proposes it will exercise its right to develop a methodology to net out non-packaging and printed paper and commingled glass from calculation of capture rate when calculating applicable bonus payments. Our concerns are:</p> <ul style="list-style-type: none"> - We are paying for contamination through a separate mechanism in the contract (penalties) which seems that Recycle-BC is doubling dipping. - View this as challenging and difficult to do. <p>3. Streetscapes</p> <p>The Recycling Regulation requires that producers develop a plan to collect packaging and paper products from municipal property that is not industrial, commercial or institutional property. Although Recycle BC's PPP plan defines reasonable access 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 kilometer", further clarity is required to understand whether additional Recycle BC criteria will impact the scope of streetscape collection activities.</p> <p>Costs: The Recycling Regulation makes the producer responsible for collecting and paying the costs of collecting and managing products. Recycle BC's PPP plan states that "Recycle BC will not directly undertake streetscape collection in their community" if municipalities decline the offer. Although co-collecting recyclable material along with other waste streams on streetscapes makes sense to manage contamination, Recycle BC's approach, which requires mandatory local government participation, does not appear to meet the test of producer responsibility of collecting and paying the costs of obligated PPP, as described in the Ministry of Environment and Climate Change Strategy Recycling Regulation Guidance document (April 24, 2018).</p> |
|-------|-------|---------------------|----------------|--|--|



RECYCLEBC™

May 2018
5-Year Cost Study



RECYCLE BC

RCBC Consultation

May 30, 2018

AGENDA

- Welcome and Introductions
- Five Year Cost Study Refresh Summary
- Update to Statement of Work – Key Changes
- Services Agreement Timeline
- Questions and Answers

WELCOME AND INTRODUCTIONS

- Welcome
- Presenting live and via webcast
- Will take questions at the end of the presentation; on the webcast please type questions into the Q+A section
- Speakers:
 - Tamara Burns, VP Supply Chain
 - Jordan Best, Director, Collection



COST STUDY

5-Year Refresh Summary

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 the financial incentive values, both for the 2014 Services Agreements and for the new Services Agreements being issued in 2018.

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 Williams Accounting Professional Corporation (the same accountant who performed the 2013 study).
- Where Recycle BC now provides direct service, the 2017 collection cost data was provided to the accountant 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, only 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.

STUDY SIZE

- 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, suggests the data must be used with caution.

DATA COLLECTION METHODOLOGY

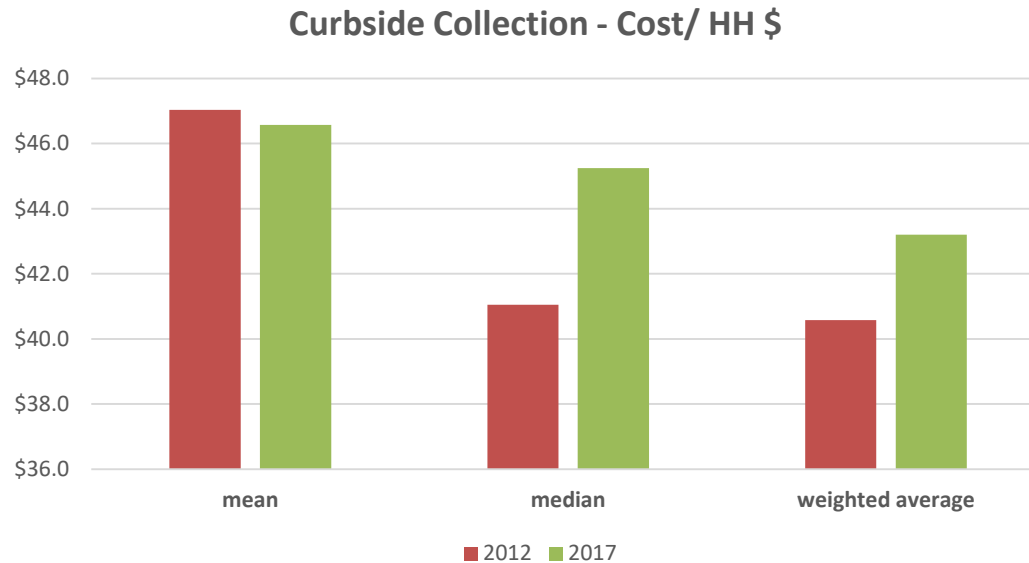
- In early January 2018, local governments were sent a letter from Recycle BC requesting their participation.
 - The local governments were then sent a data collection spreadsheet as well as a guideline document.
 - Meetings with Williams Accounting were arranged in January, February and March. All locations – 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.
-

STUDY RESULTS – CURBSIDE COLLECTION

- 11 curbside collection programs were studied.
- Diversion ranged from 42 Kgs/HH to 200 Kgs/HH
- Cost/HH ranged from \$27 to \$69
 - Mean \$47
 - Median \$45
 - Weighted average by HH \$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%

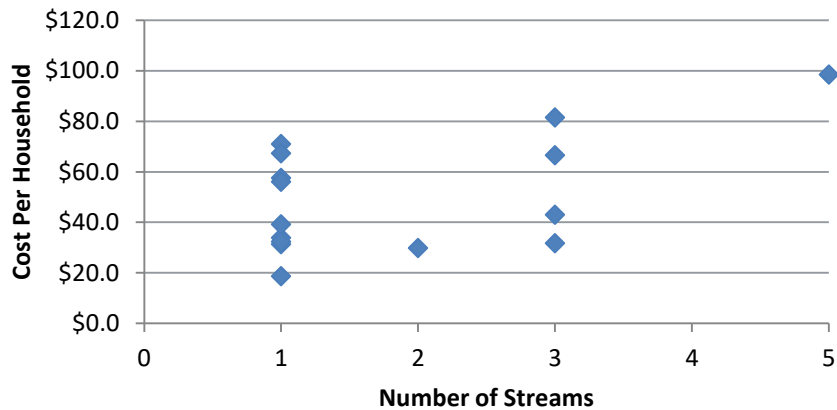
STUDY RESULTS – CURBSIDE COLLECTION

- The five-year change in cost/HH charted:

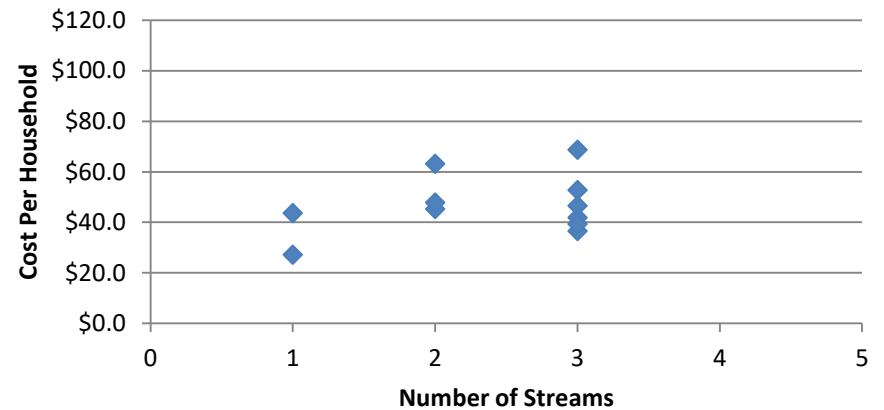


STUDY RESULTS – CURBSIDE COLLECTION

2012 - Cost/ HH vs # of Streams



2017 - Cost/ HH vs # of Streams

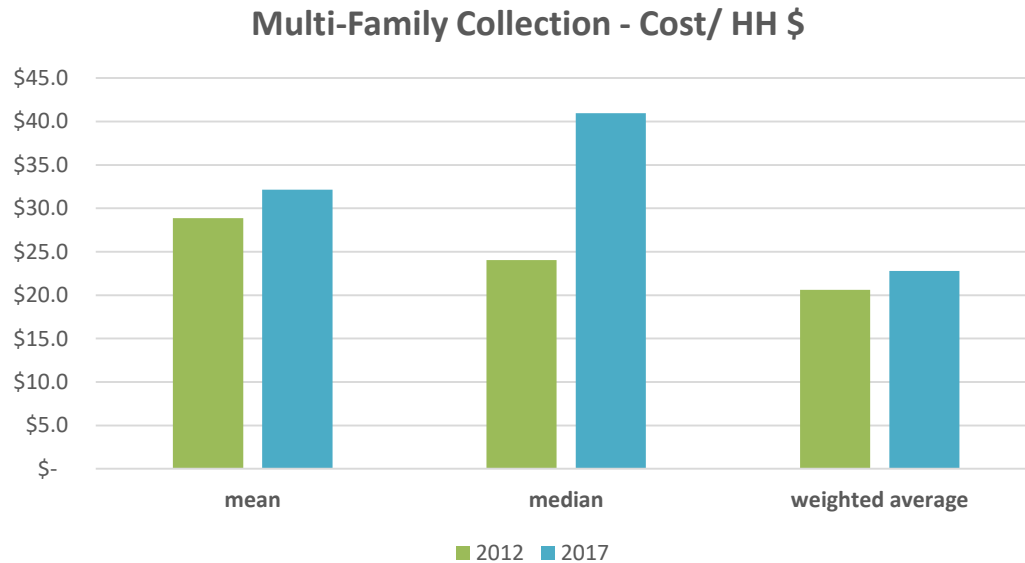


STUDY RESULTS – MULTI-FAMILY COLLECTION

- 5 multi-family collection programs were studied.
- Diversion ranged from 67 Kgs/HH to 91 Kgs/HH
- Cost/HH ranged from \$14 to \$43
 - 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%

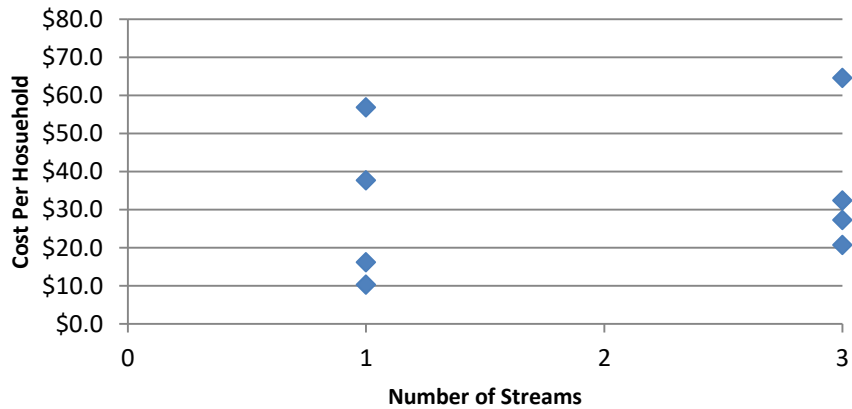
STUDY RESULTS – MULTI-FAMILY COLLECTION

- The five-year change in cost/HH charted:

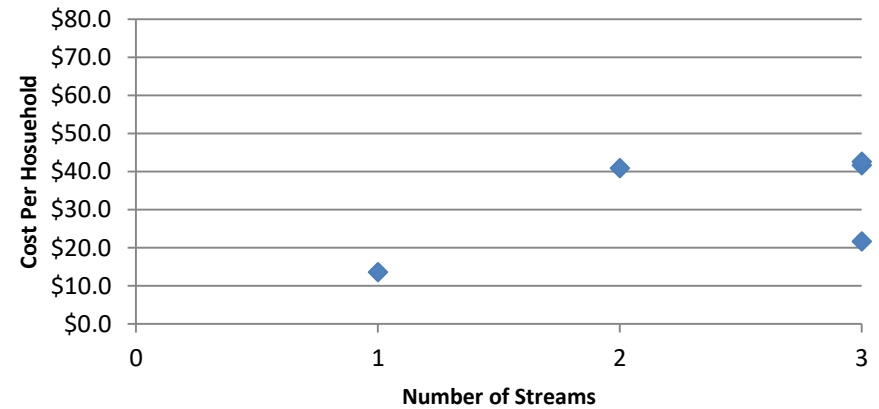


STUDY RESULTS – MULTI-FAMILY COLLECTION

2012 - Cost/ HH vs # of Streams



2017 - Cost/ HH vs # of Streams

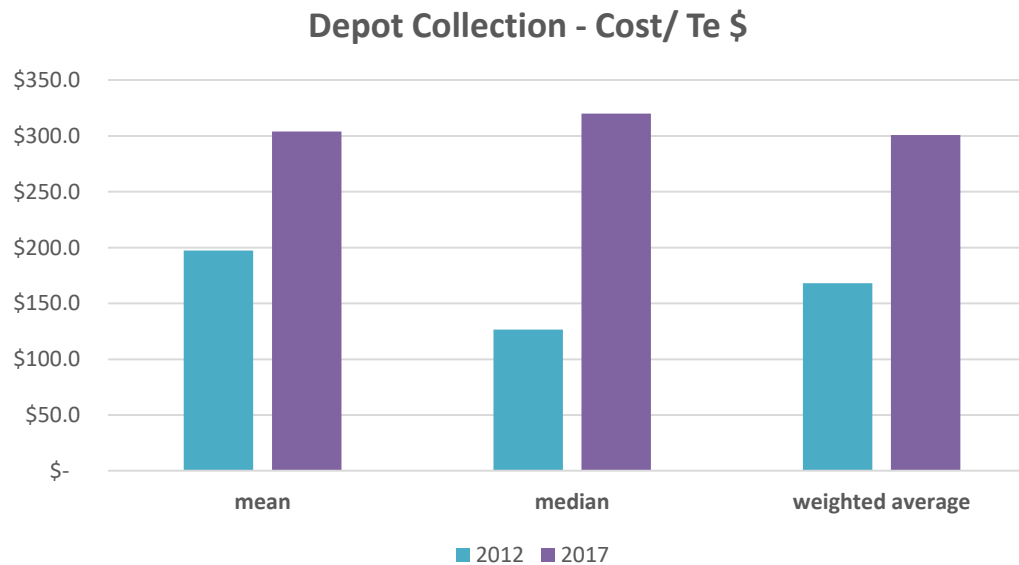


STUDY RESULTS – DEPOT COLLECTION

- 8 depot collection programs were studied.
 - Cost/Tonne ranged from \$148 to \$420
 - Mean \$304
 - Median \$320
 - Weighted average by HH \$301
 - The five-year change in cost/Te 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 unmanned depots to staffed depots.
-

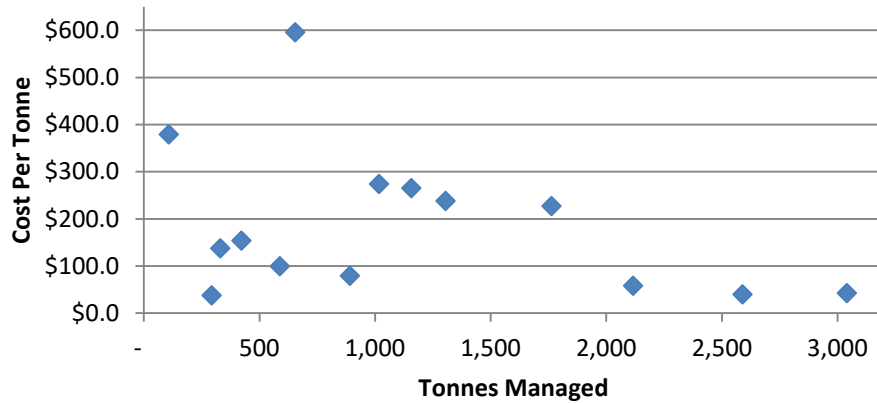
STUDY RESULTS – DEPOT COLLECTION

- The five-year change in cost/Te charted:

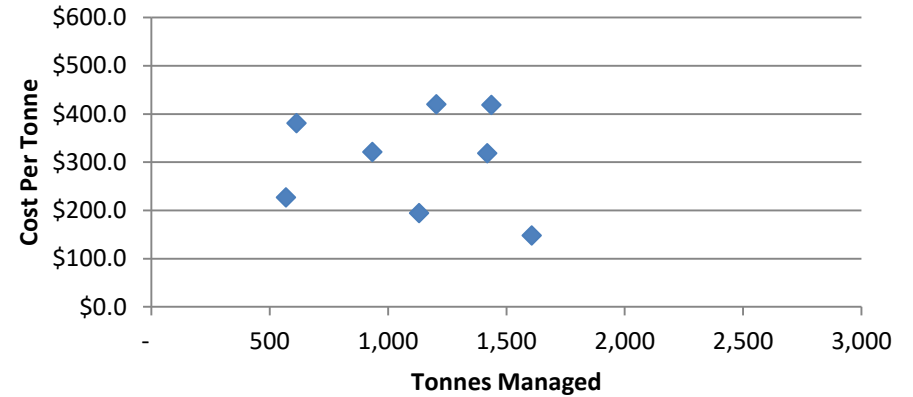


STUDY RESULTS – DEPOT COLLECTION

2012 - Cost per Tonne vs Tonnes Managed



2017 - Cost per Tonne vs Tonnes Managed

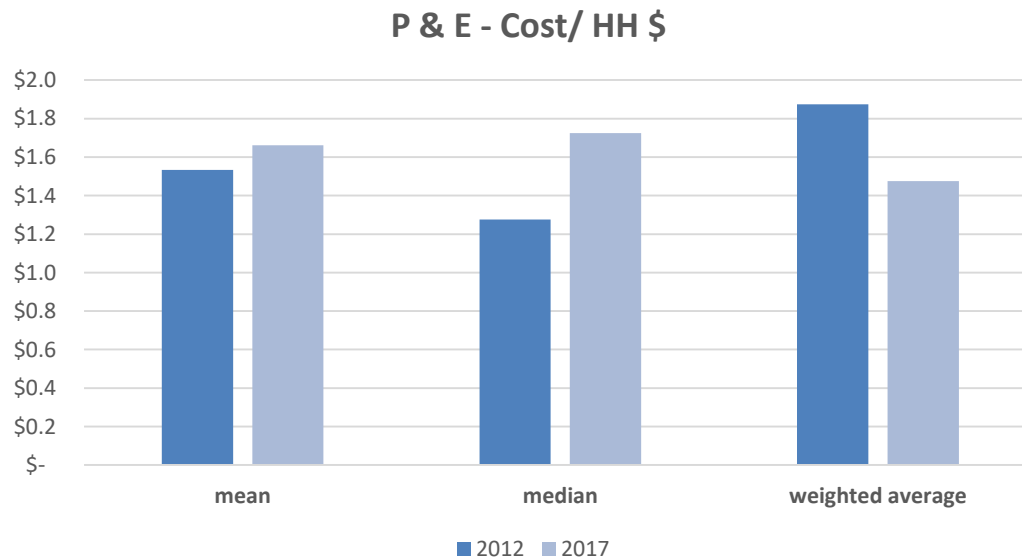


STUDY RESULTS – PROMOTION AND EDUCATION

- 17 locations' data were studied.
- Cost/HH ranged from \$0.02 to \$7
 - 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%

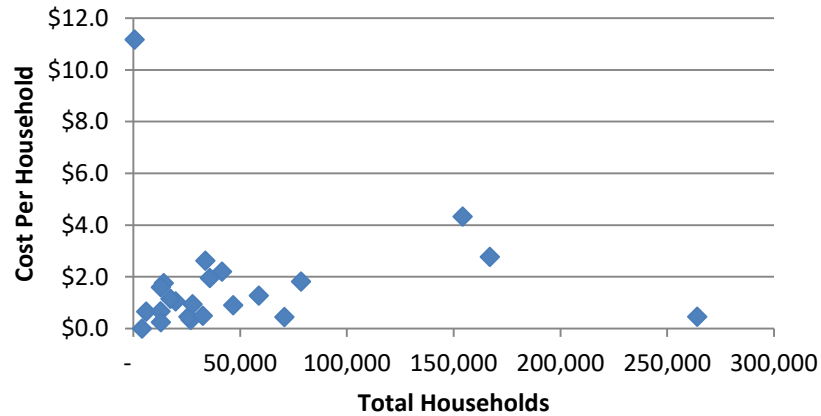
STUDY RESULTS – PROMOTION AND EDUCATION

- The five-year change in cost/HH charted:

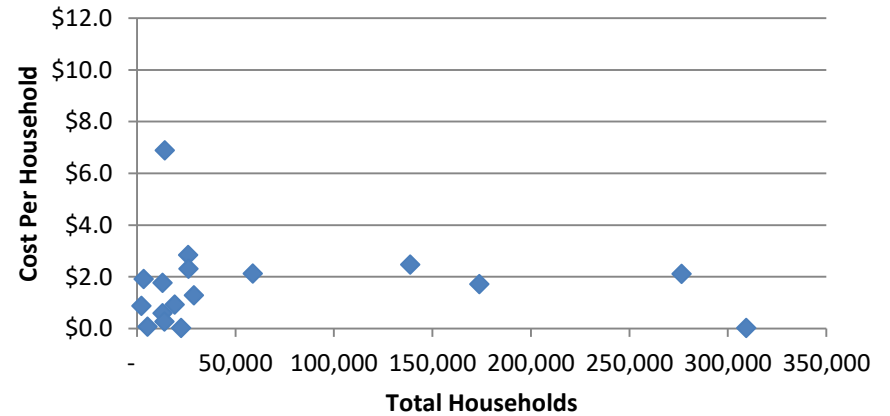


STUDY RESULTS – PROMOTION AND EDUCATION

2012 - P&E Cost/ HH vs Households



2017 - P&E Cost/ HH vs Households

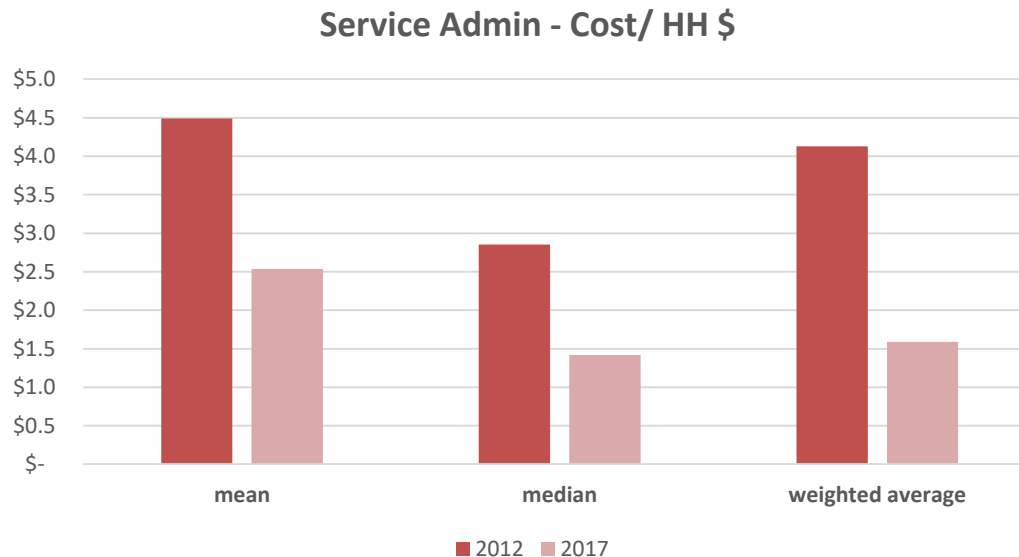


STUDY RESULTS – SERVICE ADMINISTRATION

- 17 locations' data were studied.
- Cost/HH ranged from \$0.18 to \$8
 - 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%

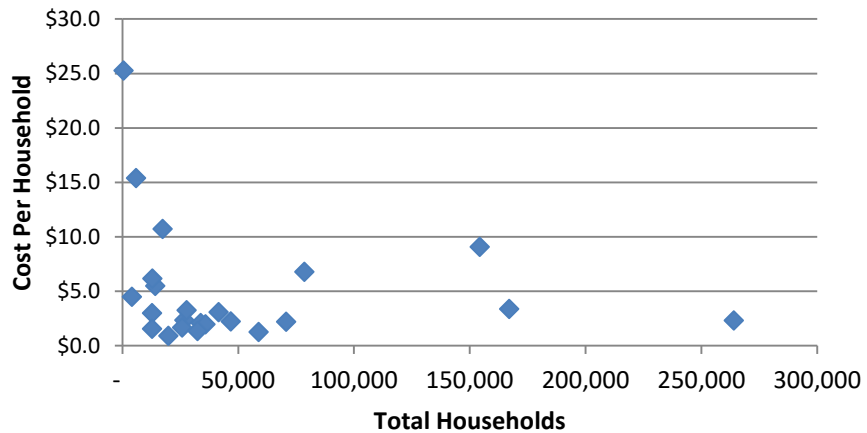
STUDY RESULTS – SERVICE ADMINISTRATION

- The five-year change in cost/HH charted:

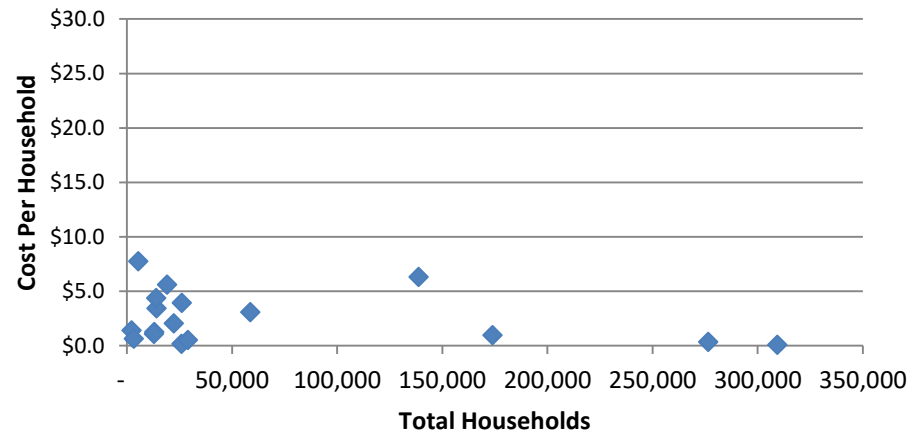


STUDY RESULTS – SERVICE ADMINISTRATION

2012 - Service Admin. Cost/ HH vs Households



2017 - Service Admin. Cost/ HH vs Households



NEXT STEPS

- A summary of the collection cost research will be published on Recycle BC's website.
- This research into packaging and paper collection costs has been used to assist in the setting of the financial incentive values for the new Services Agreements being issued in 2018.
- Recycle BC will be hosting a webinar in June to specifically discuss the incentive payment methodology and the new financial incentive values.



SOW UPDATE

Key Changes

KEY CHANGES – ITEMS REMOVED

- Based on feedback from the consultation, the following four items proposed will not be going forward in their respective Statements of Work and have changed to:
 - Depots that primarily service households with curbside/MF service will retain paper and container collection incentive payments,
 - Multi-family incentives will not be reduced at this time if cardboard (OCC) is collected separately and managed outside Recycle BC program,
 - Recycle BC's logo will not be mandatory on collection containers,
 - Curbside collectors switching out of single-use collection containers to reusable collection containers may consider resident-supplied reusable containers in low density collection areas, as approved by Recycle BC.

KEY CHANGES – ITEM ADDED

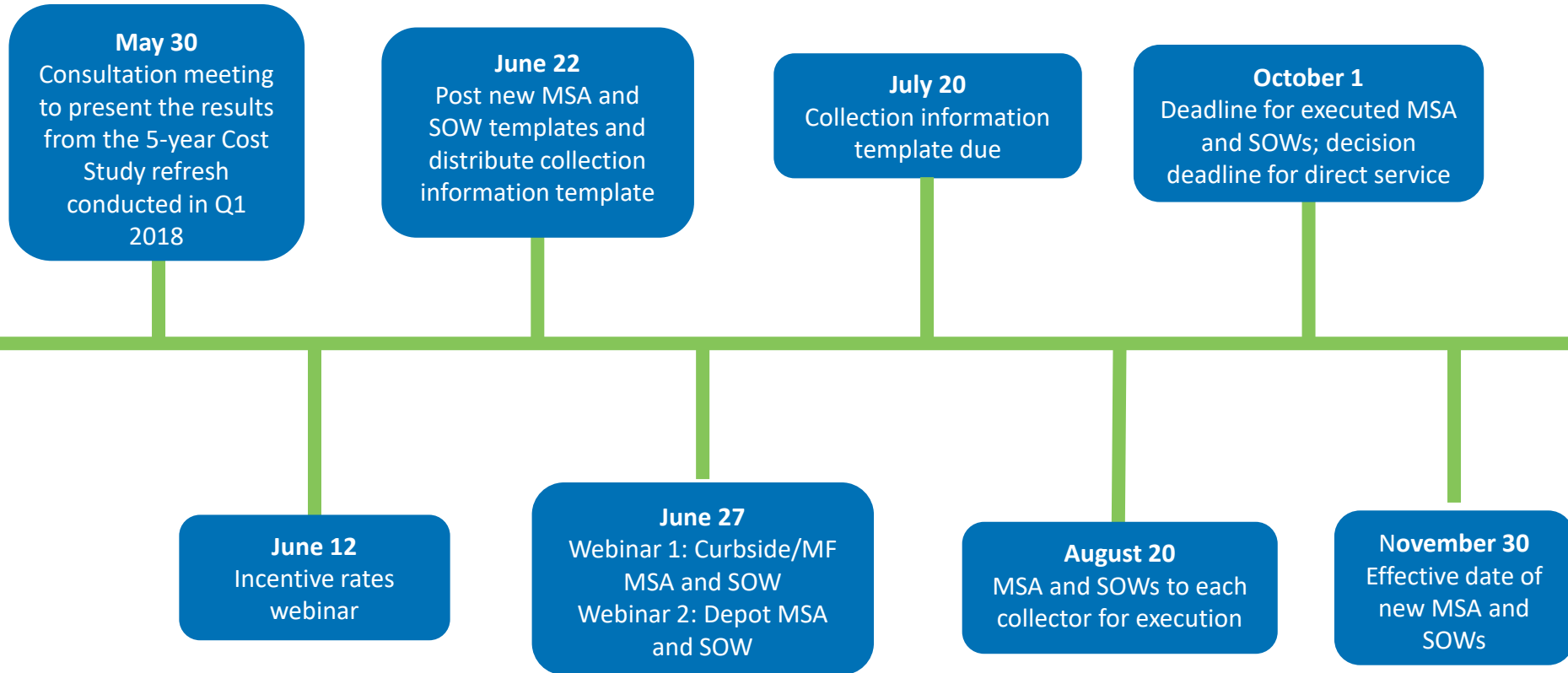
- Due to global market conditions demanding significantly stricter quality standards, and the China Ban impact on the marketing of paper worldwide, the following change is being made to the Service Level Failure Credit (SLFC) for >3% non-packaging and paper contamination:
 - Addition of new tier to the SLFC process for largest curbside and multi-family collectors , which will include a year-over-year stepped increase to the value of the SLFC when the collector has received a SLFC and in the subsequent year(s) does not decrease contamination in their service area to 3% or less.
 - Year 1 - \$5,000 per load, Year 2 - \$10,000 per load, Year 3 - \$15,000 per load, Year 4 & 5 - \$20,000 per load
 - Maximum of 24 loads per year remains



TIMELINE

Services Agreement

TIMELINE FOR SERVICES AGREEMENTS





QUESTIONS



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Webinar on the Recycle BC 5-Year Cost Study, May 30, 2018 QA

| # | Sector | Question | Answer |
|----|------------------|--|---|
| 1. | Local Government | Will the slide presentation be available following the webinar for reference when reporting back to our elected officials? | Yes, the slide presentation and the recording from the webinar is available under '5-year study and consultation updates' here . |
| 2. | Not provided | Do you know what percentage of total recycling done in BC is handled by Recycle BC? | We do not know the exact percentage of packaging and paper product recycling that is managed by Recycle BC but we believe the majority of BC residents receive residential recycling services financed and operated by Recycle BC. Please note however that Recycle BC does not manage any of the packaging and paper material collected from the institutional, industrial or commercial (ICI) sector. |
| 3. | Not available | Do we have information on why service administration costs are so low or decreased to such an extent in some communities? | We do not have that insight. In some instances, these were observations noted by the accountant through his discussions with communities but no further explanations were provided. |
| 4. | Not available | How will we define which are the largest municipalities that will be subjected to the new service level failure credit process? Will that be based on households? | Yes, the determination of communities that will be part of the new service level credit process will be based on number of households. As of today, we have not yet made a determination of that threshold. We expect the new service level failure credit would apply to only a few communities and we welcome input on how to set that threshold. |
| 5. | Not available | Was the new proposed service level failure credit for large municipalities proposed for multi-family collection in addition to curbside? | No, we are proposing for curbside only at this time. |
| 6. | Local Government | Were there any interesting findings on the cost for communities which moved from providing their own services in 2012 to transitioning to direct service provided by Recycle BC in 2017? | We did not note a specific trend. In the cost study we are showing a cost per household which includes some direct service communities which were municipally run in the 2012 data; however, the number of households in some cases was close to double when the community went to direct service which makes cost comparisons difficult. |



Webinar on the Recycle BC 5-Year Cost Study, May 30, 2018 QA

| # | Sector | Question | Answer |
|----|---------------|--|--|
| 7. | Not available | Can you please explain the requirement for a 90 kg/ household capture rate that is being proposed? | There are a number of curbside collection programs that are part of the Recycle BC program that have a capture rate below 90 kg/ household. All of the existing collectors under the Recycle BC program, regardless of whether or not they are achieving 90 kg/ household, will receive an offer for a new five-year agreement. The 90 kg/ household threshold refers to the capture rate a community needs to achieve in order to be eligible to transition their program to direct service by Recycle BC. |
| 8. | Not available | In developing that threshold of 90 kg/ household for direct service by Recycle BC, did you take into consideration programs in rural communities which generate considerably less material per household? | Yes, we did consider rural communities where the capture rate is lower than what is typically achieved in larger urban centres. Recycle BC operates curbside programs directly in a number of areas that have very low capture rates and we have experience with the costs associated with delivering programs where there is a very low capture rate. When reviewing the capture rates of all the communities across the province we came to the conclusion that 90 kg/ household was a fair threshold for the delivery of curbside recycling services by Recycle BC. However, if a community wants to deliver curbside service where they are not achieving that capture rate they are welcome to deliver that service and receive our incentive rate. |
| 9. | Not available | Can you explain the eligibility criteria of a community that has a population of less than 5,000 but is achieving a 90 kg/ household capture rate? How would you determine if they meet the eligibility requirements if they don't meet the threshold for population but meet the required capture rate? | Recycle BC has established some criteria for a community to receive curbside collection and that includes a community having a population of 5,000 and the community being incorporated. We have examined programs across the province and have concluded that for communities with a population of less than 5,000 depot service makes more sense often because these communities are in rural parts of the province allowing the community to share the cost of the depot with surrounding rural areas. However, if there are communities of less than 5,000 that are achieving a 90 kg/ household capture rate, that is new information and we would need to look at that community to determine how to proceed. |



Webinar on the Recycle BC 5-Year Cost Study, May 30, 2018 QA

| # | Sector | Question | Answer |
|-----|--------------------------|---|--|
| 10. | Not available | If circumstances changed for a collector between 2012 and 2017, how did the cost study account for those changes? | In the cases where there was significant change in the community our accountant had meetings with the collectors to review their surveys and the elements of their program and in particular items such as allocations. In some cases, allocations changed because the programs have changed, so yes, the survey did account for changes in programs between 2012 and 2017 through this cost survey process. |
| 11. | Not available | Given that this year's study was designed to establish the five-year cost delta between 2012 and 2017, when Recycle BC conducts this survey in the future will you approach the study differently | Yes, it would be our hope to have a much wider level for participation during a future study so that we are able to achieve results that are statistically sound and that would be achieved by including a larger number of communities. This will be the last time we will use this data set. Next time we will undertake a study it will have a much broader scope and participation. |
| 12. | Not available | On the scatter plot for Promotion and Education costs there are some communities that appear to be spending zero on P&E, how can that be? | Some communities appear to have zero costs because their costs/ household were less than one dollar. When charting communities based on costs/ household if their costs are less than one dollar it appears as zero when in fact they are spending under \$1.00/ household. |
| 13. | Private Waste Management | Does the data you collected on depots represent those serving small and remote communities as well as large and more central depots? | In the original 2013 study where 16 depots participated there was province-wide distribution and the representation of depots covered different types of depots and depots serving different types of communities. Only eight of those depots participated in the current study so we cannot say that we have the same representation as 2013, however we believe that we still have a fair representation of the different types and characteristics of depots across BC. |
| 14. | Depot Operator | Many depots are privately owned and operated. Why did you only approach local governments and regional districts with regards to depot costs? Would it not have been better to have a cross section of depot types? | The purpose of this study was to replicate the 2012 data set to the greatest extent possible in order to determine the cost delta over the past five years. Since the 2013 study included only local government operated depots we also only invited local government to participate in this study. Going forward we would like to have a |



Webinar on the Recycle BC 5-Year Cost Study, May 30, 2018 QA

| # | Sector | Question | Answer |
|-----|--------------------------|---|--|
| | | | more comprehensive cost study and will invite the participation of private depots and hope they are willing to share their data with us. |
| 15. | Private Waste Management | Do you compensate governments or depots financially for collecting the data? | No, there was no compensation provided to those who participated in the survey. |
| 16. | Not available | Will Recycle BC share which communities participated in the cost study? | No, we are not able to share that information with you. Communities participated with the understanding that by providing their data to a third-party accountant the list of participating communities would not be shared. |
| 17. | Local Government | Does Recycle BC require participation in providing this data by collectors? | No, the data that was provided by communities was provided voluntarily and we do appreciate all those that took the time to share their data with the accountant so that we could conduct the cost comparison. |
| 18. | Not available | Is it still Recycle BC's intent to require the phase-out of blue bags and provide new containers? | Yes, any collectors currently using blue bags as their collection container type (which accounts for approximately 10% of households receiving curbside service and a declining trend) will be required to move away from blue bags within 19 months of the new agreement and during that time will decide what type of collection container makes the most sense for their community. |
| 19. | Not available | Is Recycle BC requiring a certain type of collector container? | Recycle BC is not being prescriptive about the type of container that should be provided to residents. Recycle BC has recommendations as we have experience in a number of communities with different container types and which ones we believe work best and we are very happy to have discussions with individual collectors as they make those decisions. |
| 20. | Private Waste Management | Why are the compensation rates increasing substantially for things that are light such as styrofoam but are increasing very minimally for heavier materials of which we collect a large amount? | Thank you for that question. We would like to address the question of compensation rates at the Recycle BC webinar on June 12th when we will review the methodology behind the compensation rates and will provide the rationale for the updated rate structure. |



Packaging and Paper Product Collection Costs

Five Year Cost Study Refresh

The Packaging and Paper Product (PPP) Stewardship Plan¹ delivers PPP collection services by providing opportunity for those involved in the collection of PPP to provide services directly to their residents and customers². 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 prices³. 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.

¹ Available via the Recycle BC website at https://recyclebc.ca/stewards/regulation_and_stewardship_plan/

² 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.

³ 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 |
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| 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.

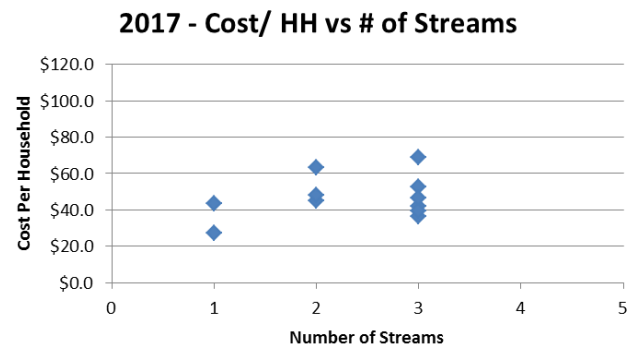
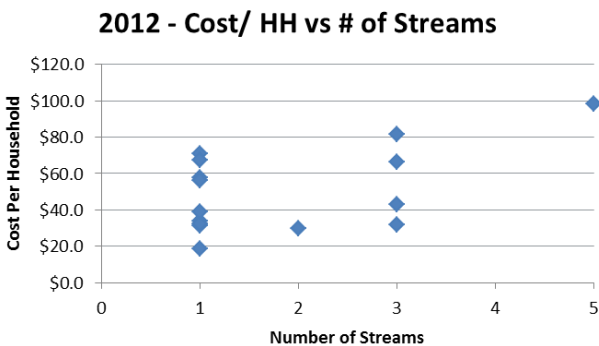
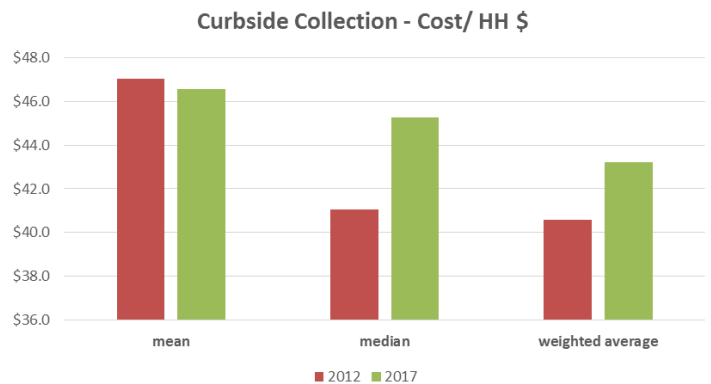
Diversion in 2017 ranged from 42 Kg/HH to 200 Kg/HH. Diversion in 2012 was from 48 Kg/HH to 270 Kg/HH.

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

- Mean⁴ \$47
- Median⁵ \$45
- Weighted average by HH⁶ \$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%



⁴ Mean: the average of the numbers

⁵ Median: the middle number in a list of sorted numbers

⁶ 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.

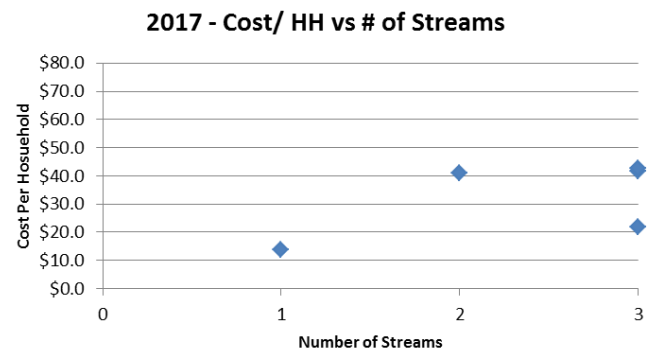
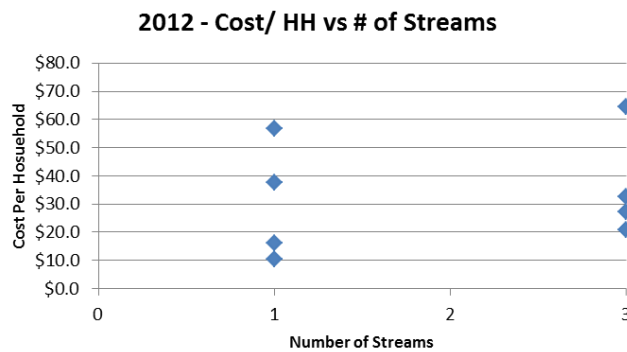
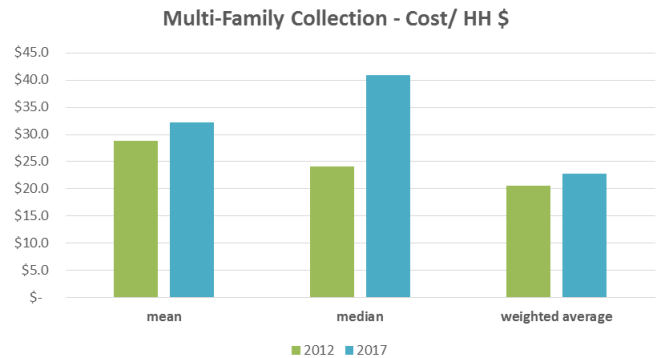
Diversion in 2017 ranged from 67 Kg/HH to 91 Kg/HH. Diversion in 2012 was from 73 Kg/HH to 136 Kg/HH).

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

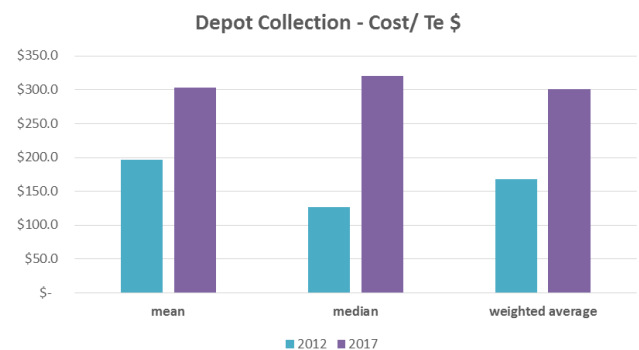
Based on the responses received, 8 depot collection programs were studied in 2018.

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

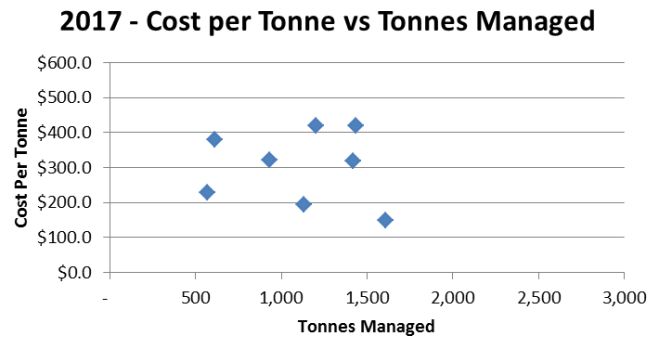
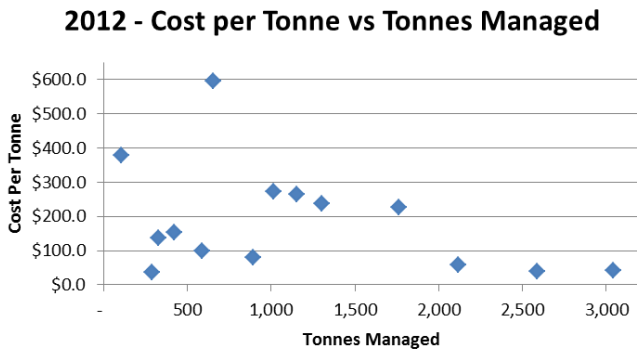
- Mean \$304
- Median \$320
- Weighted average by HH \$301

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.



Promotion and Education

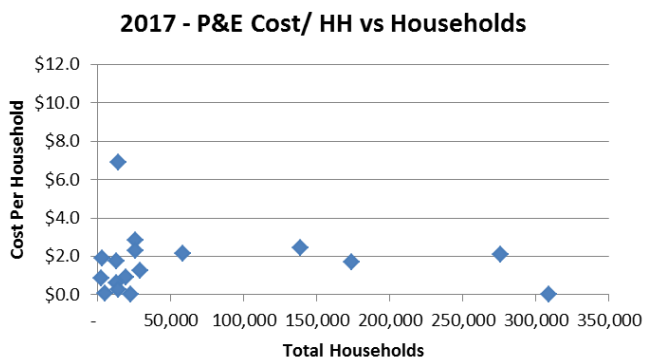
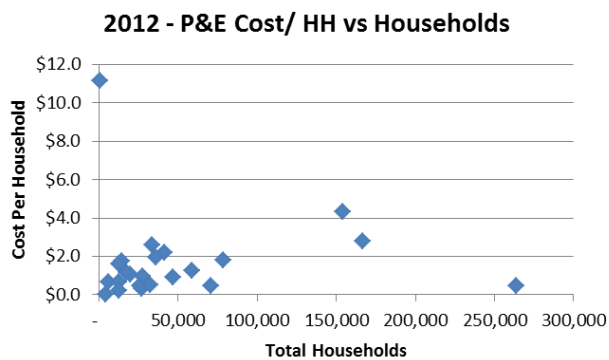
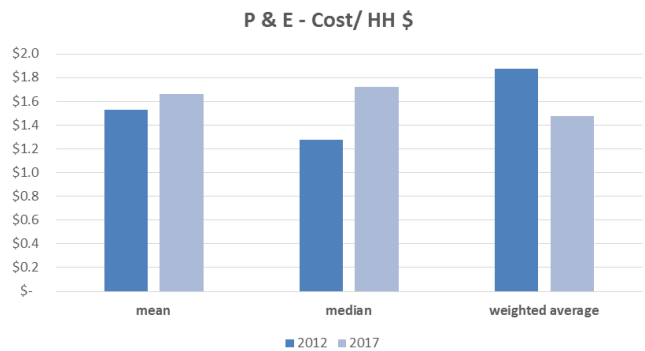
Based on the responses received, 17 locations' data were studied in 2018.

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%



Service Administration

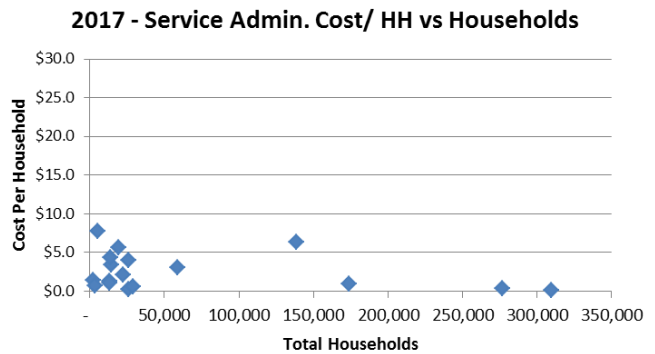
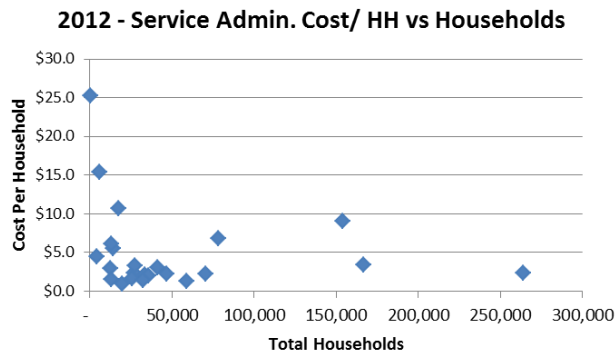
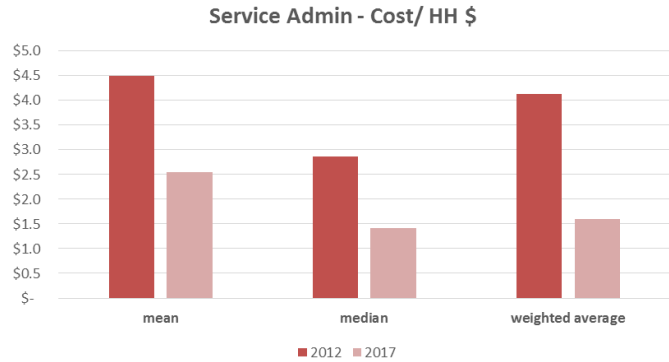
Based on the responses received, 17 locations' data were studied in 2018.

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%





RECYCLEBC™

June 2018

**Financial Incentives & Payment Methodology
Collector Agreement Reviews**



RECYCLE BC

Financial Incentives and
Payment Methodology

June 12, 2018

AGENDA

- Welcome and Introductions
- Financial Incentives & Payment Methodology – general overview
- Curbside Collection
- Multi-Family Collection
- Depot Collection
- Promotion and Education; Service Administration
- Summary
- Services Agreement - timeline
- Questions and Answers

WELCOME AND INTRODUCTIONS

- Welcome
- Presenting live and via webcast
- Will take questions at the end of the presentation; on the webcast please type questions into the Q+A section
- Speakers:
 - Tamara Burns, VP Supply Chain
 - Jordan Best, Director, Collection



FINANCIAL INCENTIVES & PAYMENT METHODOLOGY

General Overview

OVERVIEW

- Recycle BC began planning for the November consultation in early 2017.
- In proposing changes to our Services Agreements we were guided by the following aims:
 - Operational efficiency and effectiveness
 - Value for Recycle BC stewards
 - Addressing operational challenges - collection and post-collection
 - Environmental responsibility
 - Fostering accountability
 - Balancing needs of all stakeholders, including residents

OVERVIEW

- A key component to the new collector agreements is the payment framework which contains the incentive offers.
- Steps undertaken by Recycle BC to review the framework and prepare the proposed incentive offers were:
 1. Detailed review of the past 3 years of program data, including performance by collection type and collection channel,
 2. Review of contamination levels and their impact on total supply chain cost,
 3. Cross-jurisdictional price scan and review of BC Consumer Price Index,
 4. Review of service performance requirement changes since the 2013 MSA and SOWs were written.

OVERVIEW

- Consultation event: “All changes are proposals only – feedback welcome”,
- 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)



2017 Consultation Report

Published February 28, 2018



OVERVIEW

- To arrive at the final incentive offers being shown today, the steps were:
 1. Review the feedback received from the November consultation and all subsequent feedback provided,
 2. Review the findings of the 5-Year Cost Study Refresh undertaken in Q1, 2018,
 3. Consider the impact of the China Ban on global marketing conditions with respect to contamination,
 4. Review any changes to the SOWs that have financial implications.
- This is the general overview; specifics on the methodology for curbside, multi-family and depot are provided in each section of this presentation.



COST STUDY

Overview

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 the financial incentive values, both for the 2014 Services Agreements and for the new Services Agreements being issued in 2018.

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 an independent 3rd party accounting firm (the same accountant who performed the 2013 study).
- Where Recycle BC now provides direct service, the 2017 collection cost data was provided to this accountant 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, only 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.

STUDY SIZE

- 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 |

- The accountant noted this lack of participation, and limited data set, led the accountant to suggest 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.
 - Meetings with the 3rd party 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.
-

STUDY REPORT

- The final 5-Year Cost Study Refresh report can be found on Recycle BC's website on the consultation page.
- Details from the cost study for curbside, multi-family and depot are provided in each section of this presentation.
- As a reminder: the accountant noted the lack of participation, and limited data set, suggests the data must be used with caution.



Packaging and Paper Product Collection Costs

Five Year Cost Study Refresh

The Packaging and Paper Product (PPP) Stewardship Plan¹ delivers PPP collection services by providing opportunity for those involved in the collection of PPP to provide services directly to their residents and customers². 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 prices³. 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.





CURBSIDE COLLECTION

CURBSIDE COLLECTORS

| Collector Type | Number of Collectors |
|-------------------|----------------------|
| Local Governments | 57 |
| First Nations | 10 |
| Direct Service | 3 |



CONSULTATION: CURBSIDE INCENTIVE RATES

- The comments with the most repetition were:
 - 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.
 - 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.
 - Recycle BC could provide multi-stream collection with additional compensation.

CONSULTATION: CURBSIDE INCENTIVE RATES

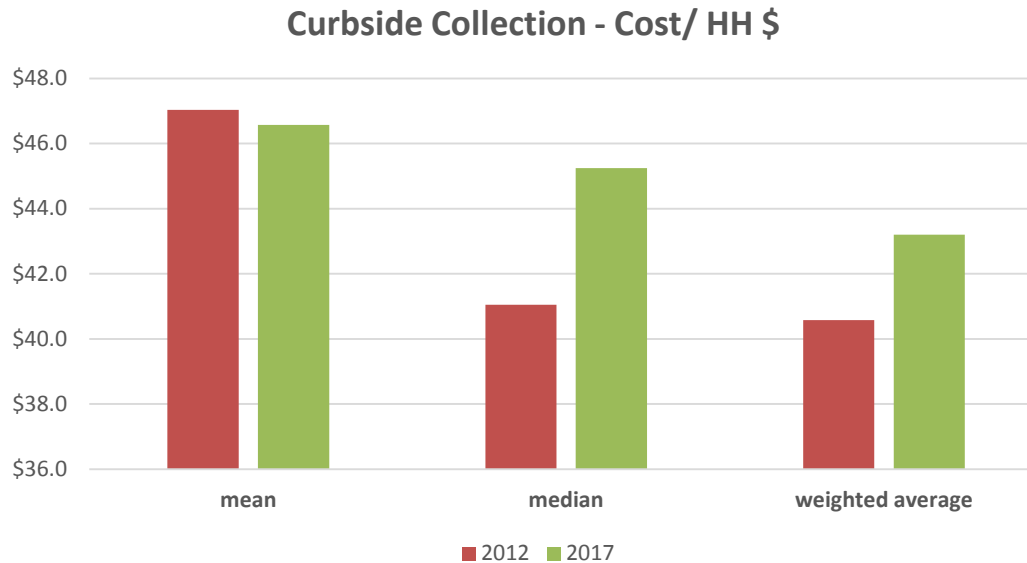
- Some other comments on incentive rates were:
 - Support proposal of collection fee structure being based on container type, not just material stream. This is a more accurate reflection of operational costs.
 - Incentive rates for single stream collectors using automated carts shouldn't be so much lower than other container types. Consideration needs to be given to mobility, or flexibility to include new mobility costs. Automated carts also require maintenance costs.
 - We would prefer to see an all-in cost recovery structure rather than top ups for education, service administration and depots.
- No suggestions for the actual incentive rate price were received.

STUDY RESULTS – CURBSIDE COLLECTION

- 11 curbside collection programs were studied.
- Diversion ranged from 42 Kg/HH to 200 Kg/HH
- Cost/HH ranged from \$27 to \$69
 - Mean \$47
 - Median \$45
 - Weighted average by HH \$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%

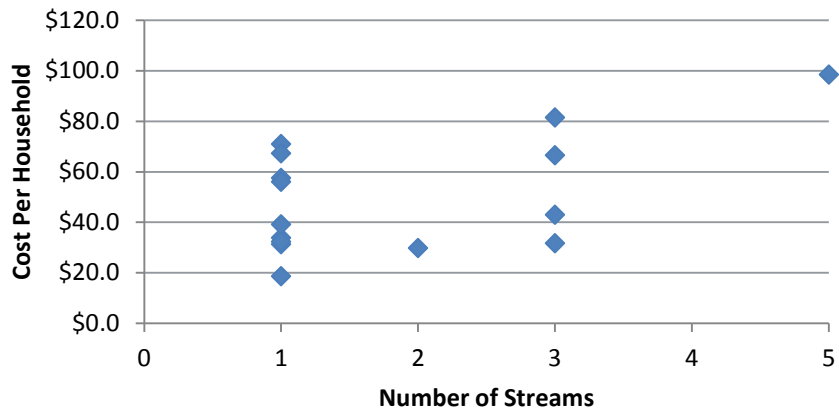
STUDY RESULTS – CURBSIDE COLLECTION

- The five-year change in cost/HH charted:

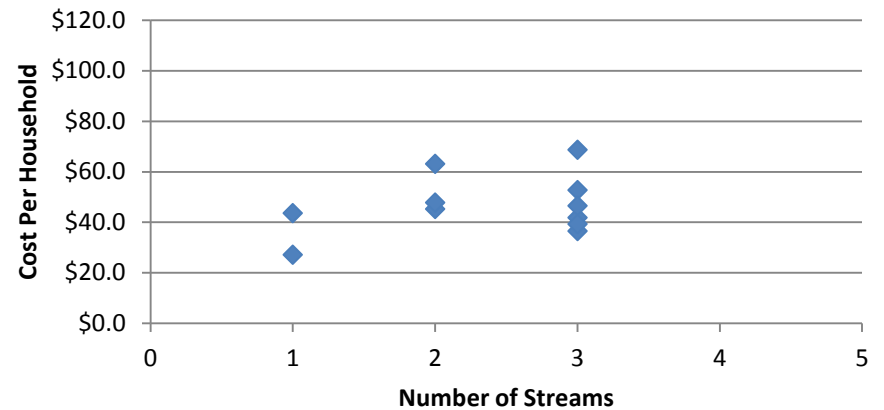


STUDY RESULTS – CURBSIDE COLLECTION

2012 - Cost/ HH vs # of Streams



2017 - Cost/ HH vs # of Streams



CHINA BAN & CONTAMINATION IMPACT

- The inability to find end markets for mixed waste material is now a global issue. For example, China currently requires material to have no more than 0.5% contamination.
- Total contamination (non-PPP) in the system is 6.1% (past 12 months to March 2018) with contamination levels for single stream collectors almost twice that for multi stream.
 - At 6.1% contamination, that is 12,200 tonnes and \$4.9 million in handling (collection, processing, management) costs for material that is non-PPP.
 - Curbside multi-stream fibre has a contamination rate of 2.6% while the single stream contamination rate is running at 8.2% from which fibre needs to be sorted out clean and dry for marketing.

SOW – CURBSIDE FINANCIAL IMPACT

- Due to global market conditions demanding significantly stricter quality standards, and the China Ban impact on the marketing of paper worldwide, the following change has been made to the Service Level Failure Credit (SLFC) for >3% non-packaging and paper contamination:
 - Addition of new tier to the SLFC process for largest curbside and multi-family collectors , which includes a year-over-year stepped increase to the value of the SLFC when the collector has received a SLFC and in the subsequent year(s) does not decrease contamination in their service area to 3% or less.
 - Year 1 - \$5,000 per load, Year 2 - \$10,000 per load, Year 3 - \$15,000 per load, Year 4 & 5 - \$20,000 per load
 - Maximum of 24 loads per year remains.
-

CURBSIDE PAYMENT METHODOLOGY

- Recycle BC built the curbside financial offers in the following manner:
 - Started with the current base rates and proposed new rates for consultation that took into account:
 - The performance and payment spread between single stream and multi-stream collection,
 - The performance and payment spread between collection container type,
 - Other inputs such as CPI, post-collection cost impact, bonus structure and top-ups.
 - Considered all of the factors described in the previous seven slides to determine if any adjustment to the proposed rates should be made.

CURBSIDE PAYMENT DECISION

- Recycle BC has not changed the curbside incentive payments since the initial proposal for the following reasons:
 - Single stream collection: in our opinion, with the cost impact from contamination and no other performance gains, the payment spread increase between single stream and multi-stream collection from \$3 to \$4-5 by container type is appropriate.
 - Instead of a further disincentive for all single stream collectors regarding contamination, the SLFC has been altered to tackle contamination where it is excessive in the largest collectors.
 - The Cost Study and the consultation feedback did not provide any specific adjustments to the proposed curbside collection rates.
 - Note: the total financial offer also includes top-ups and a bonus structure as part of the overall curbside payment value.

CURBSIDE INCENTIVE PAYMENT

| Service Area Density (Households/Hectare) | Incentive Rate (\$/HH/Year) |
|--|-----------------------------|
| Group 1 - Single Stream collectors using automated carts (+4% increase) | |
| > 2 HH/Hectare | \$33.40 |
| 0.2-2 HH/Hectare | \$35.40 |
| < 0.2 HH/Hectare | \$37.40 |
| Group 2 - Single Stream collectors using other container types (+8% increase) | |
| > 2 HH/Hectare | \$34.50 |
| 0.2-2 HH/Hectare | \$36.65 |
| < 0.2 HH/Hectare | \$38.80 |
| Group 3 - Multi-Stream collectors (+10% increase) | |
| > 2 HH/Hectare | \$38.45 |
| 0.2-2 HH/Hectare | \$40.65 |
| < 0.2 HH/Hectare | \$42.80 |



MULTI-FAMILY COLLECTION

MULTI-FAMILY COLLECTORS

| Collector Type | Number of Collectors |
|-------------------|----------------------|
| Local Governments | 21 |
| First Nations | 2 |
| Private Companies | 9 |



CONSULTATION: MULTI-FAMILY INCENTIVES

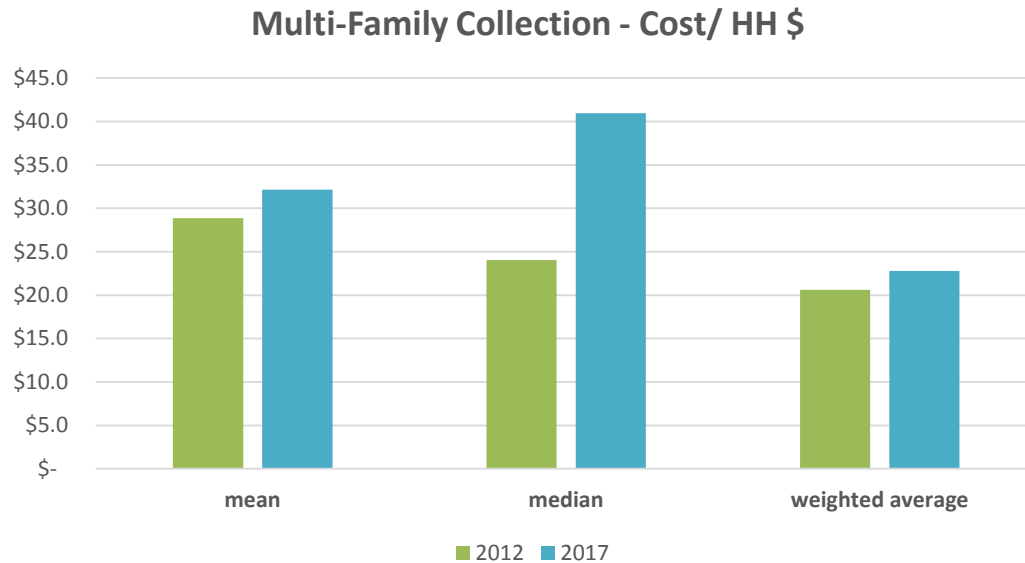
- The comments with the most repetition were:
 - Payment structure and proposed increases are too low.
 - Would like to see more encouragement towards multi-stream collection, current payment structure doesn't encourage it.
- Other comments on incentive rates were:
 - Would like to see an inflationary 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.

STUDY RESULTS – MULTI-FAMILY COLLECTION

- 5 multi-family collection programs were studied.
- Diversion ranged from 67 Kg/HH to 91 Kg/HH
- Cost/HH ranged from \$14 to \$43
 - 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%

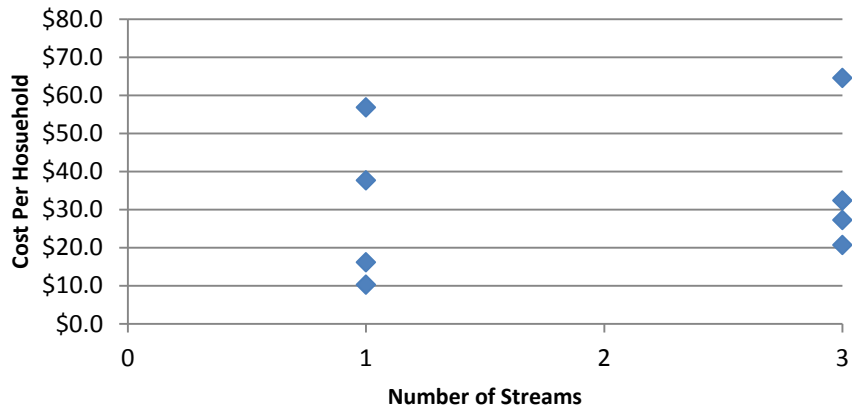
STUDY RESULTS – MULTI-FAMILY COLLECTION

- The five-year change in cost/HH charted:

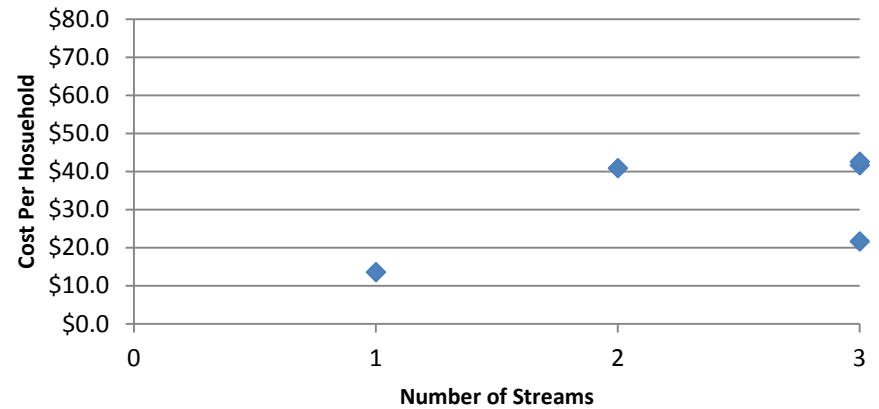


STUDY RESULTS – MULTI-FAMILY COLLECTION

2012 - Cost/ HH vs # of Streams



2017 - Cost/ HH vs # of Streams



MULTI-FAMILY COLLECTION: TWO FACTORS

1. China Ban and Contamination

- Multi-family multi-stream fibre has a contamination rate of 4.7% while the multi-family single stream contamination rate is running at 9.3% (from which fibre needs to be sorted out clean and dry for marketing).
- Multi-family multi-stream container collection has a non-PPP rate of 9.9% and contains too much film, foam and glass.

2. SOW Change

- Based on feedback from the consultation, multi-family incentives will not be reduced at this time if cardboard (OCC) is collected separately and managed outside Recycle BC program.

MULTI-FAMILY PAYMENT METHODOLOGY

- Recycle BC built the multi-family financial offers in the following manner:
 - Started with the current base rates and proposed new rates for consultation that took into account:
 - The performance and payment spread between single stream and multi-stream collection,
 - The impact of OCC within and outside of Recycle BC's program,
 - Other inputs such as CPI, post-collection cost impact, bonus structure and top-ups.
 - Considered all of the factors described in the previous five slides to determine if any adjustment to the proposed rates should be made.

MULTI-FAMILY PAYMENT DECISION

- Recycle BC has not changed the multi-family incentive payments since the initial proposal for the following reasons:
 - Single stream collection: in our opinion, the payment spread increase between single stream and multi-stream collection from \$3 to \$3.60 by container type is appropriate.
 - Contamination in both multi-stream and single stream collection is problematic, as is the quantity of cross-contamination and non-targeted material.
 - The capture rate for multi-stream dwellings is significantly lower than that of curbside household collection.
 - The Cost Study data was too limited to provide meaningful insights.
 - Consultation feedback on OCC was the strongest. A repeated suggestion: “Recycle BC to work with private haulers of OCC to collect this tonnage and or value for OCC.”
-

MULTI-FAMILY INCENTIVE PAYMENT

| Multi-Family Collector Type | Incentive Rate (\$/HH/Year) |
|---|-----------------------------|
| Single Stream Collectors (+8% increase) | \$18.30 |
| Multi-Stream Collectors (+10% increase) | \$21.90 |



DEPOT COLLECTION

DEPOT COLLECTORS

| Collector Type | Number of Depots |
|------------------|------------------|
| Local Government | 108 |
| First Nations | 5 |
| Private Company | 88 |
| Retail Location | 50 |
| Total | 251 |



CONSULTATION: DEPOT INCENTIVE RATES

- The comments with the most repetition were:
 - 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.
 - Curbside financial incentives are higher than those provided to rural depots which have to do more work, collect more material and operate longer hours.
 - 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.
 - There should be a bonus incentive for low contamination.

CONSULTATION: DEPOT INCENTIVE RATES

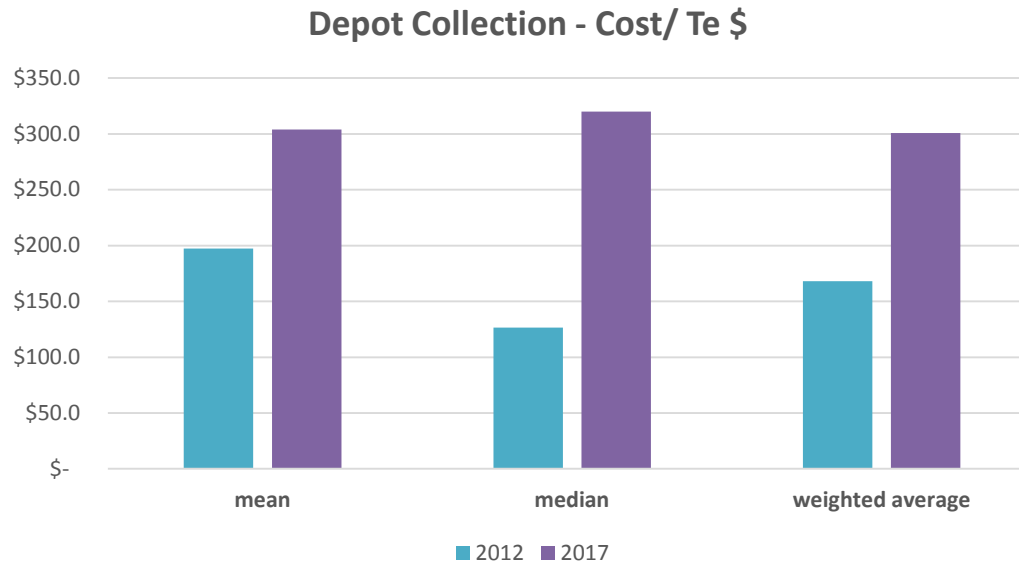
- Some other comments on incentive rates were:
 - If depots are not funded equitably, residents in some communities will be double paying for PPP.
 - Recycle BC has done an outstanding job of taking over PPP collection in BC, but has totally mis-judged our region. The program should provide a different incentive rate structure to depots in isolated locations (e.g. islands).
 - 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.
 - 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.

STUDY RESULTS – DEPOT COLLECTION

- 8 depot collection programs were studied.
 - Cost/Tonne ranged from \$148 to \$420
 - Mean \$304
 - Median \$320
 - Weighted average by HH \$301
 - The five-year change in cost/Te 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 unmanned depots to staffed depots.
-

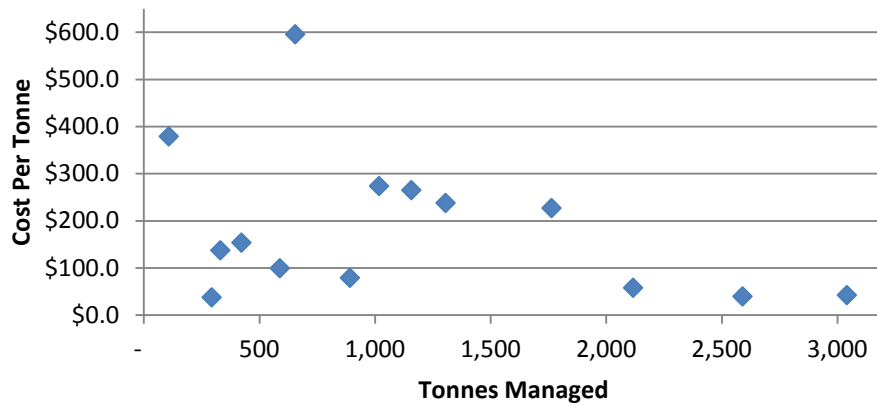
STUDY RESULTS – DEPOT COLLECTION

- The five-year change in cost/Te charted:

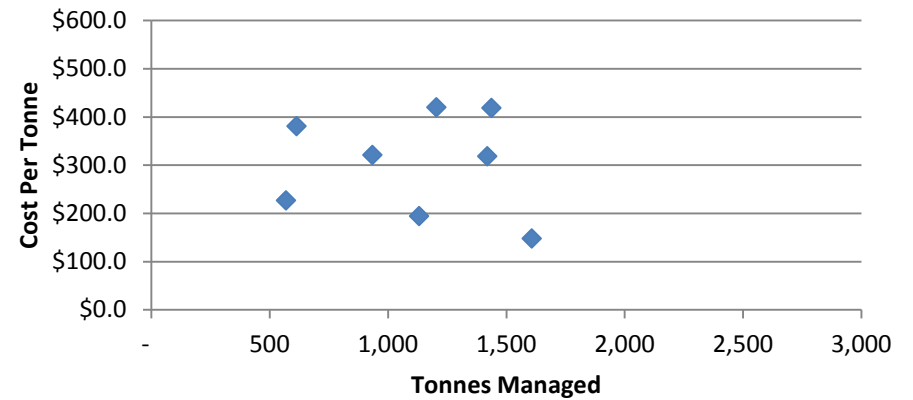


STUDY RESULTS – DEPOT COLLECTION

2012 - Cost per Tonne vs Tonnes Managed



2017 - Cost per Tonne vs Tonnes Managed



CHINA BAN AND CONTAMINATION

- Depot fibre has a contamination rate of 3.1% while the container contamination rate is running at 7.4% (for the last three months down from the last 12 months at 9.9%) - too high for a staffed and supervised collection channel.
- At this point in the program's evolution the contamination rates for film, foam, glass and metal are not known. These will be spot-checked going forward to determine the level of contamination for these segregated collection materials.

SOW – DEPOT FINANCIAL IMPACT

- Based on feedback from the consultation, depots that primarily service households with curbside/MF service will retain paper and container collection incentive payments.
 - The pilot for Other Flexible Plastic Packaging will become a permanent program.
 - 116 depots signed up for the June 1st voluntary launch.
 - Not only will this material add new collection tonnes for the depot it will reduce depot disposal costs as it was previously a contaminant to film collection.
 - The Comprehensive General Liability coverage limit for depots has been reduced from \$5 million to \$2 million.
-

DEPOT PAYMENT METHODOLOGY

- Recycle BC built the depot financial offers in the following manner:
 - Started with the current base rates and proposed new rates for consultation that took into account:
 - The performance and payment spread between material types and material groupings for collection,
 - The performance and payment spread between loose and baled collection activity,
 - Other inputs such as CPI, jurisdictional scan, and post-collection cost impact.
 - Considered all of the factors described in the previous seven slides to determine if any adjustment to the proposed rates should be made.
 - Put the final cost for depot collection into the 2019 budget.

DEPOT PAYMENT DECISION

- Recycle BC has changed some depot incentive payments since the initial proposal for the following reasons:
 - Paper and container material category payment rate increases remain as proposed; however this payment will be continued for depots that primarily service households with curbside/MF service.
 - Plastic bags/overwrap – keep increased rate from \$175/tonne to \$500/tonne
 - Other flexible plastic packaging – introduce permanent collection at \$500/tonne payment rate
 - Foam packaging – new: increase rate from \$175/tonne to ~~\$600/tonne~~ \$800/tonne to ensure that payment for a typical mega-bag quantity of foam is >\$5/bag
 - Glass containers – keep increase rate from \$80/tonne to \$90/tonne

DEPOT INCENTIVE PAYMENT

| Material Grouping | Categories | \$ /tonne | | | |
|----------------------------|----------------------------------|------------------------------------|---------------------------------|-----------------------------|-------------------------------|
| | | Serving HH without Curbside or Mix | Non-LG Serving Majority Curb HH | LG Serving Majority Curb HH | Additional Incentive if Baled |
| Paper and Cardboard | Cat 1/Cat 2/Cat 3b Cat 1,2,3b | \$ 80 | \$ 60 | \$ 60 | \$ 110 |
| Containers | Cat 3a/Cat 6/Cat 7 Cat 3a,6,7 | \$ 130 | \$ 90 | \$ 90 | \$ 110 |
| Plastic Bags | Cat 4 | \$ 500 | \$ 500 | \$ 500 | \$ 330 |
| White Foam | Cat 5 | \$ 800 | \$ 800 | \$ 800 | \$ 330 |
| Coloured Foam | Cat 5 | \$ 800 | \$ 800 | \$ 800 | \$ 330 |
| Glass Containers | Cat 8 | \$ 90 | \$ 90 | \$ 90 | n/a |
| Other Flexible Plastic Pkg | Cat 9 | \$ 500 | \$ 500 | \$ 500 | \$ 330 |



**PROMOTION AND
EDUCATION**

**SERVICE
ADMINISTRATION**

CONSULTATION: TOP UPS

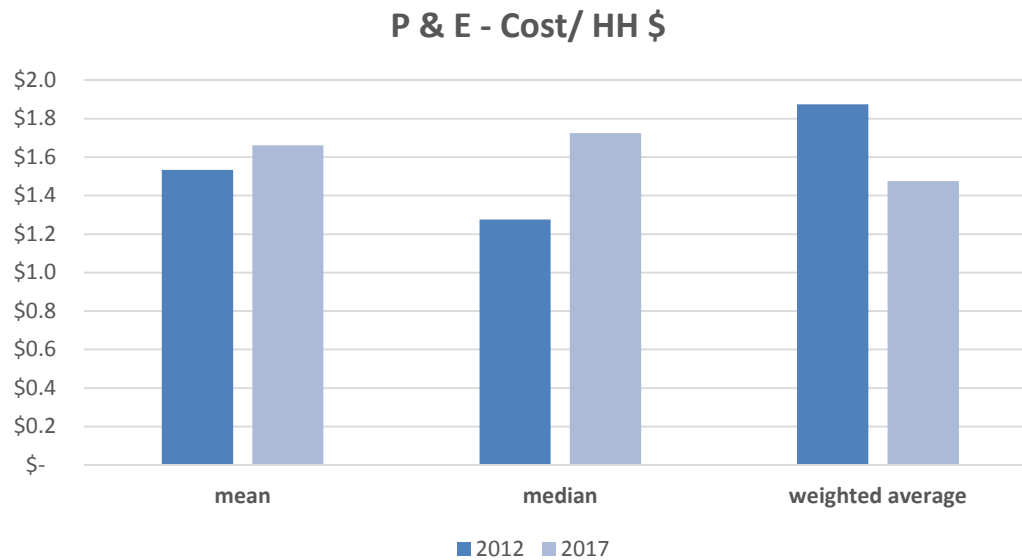
- The repeated comment was:
 - Should be maintained or increased rather than reduced given that new service requirements will result in additional administrative work.
 - Some other comments on top-ups were:
 - Should be the same regardless of whether collection is carried out in-house or via contractor. Providing lower compensation to communities with contracted service doesn't reflect that contractors' admin costs are passed on to local government through contract fees.
 - 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 rates are too low to lower contamination.
-

STUDY RESULTS – PROMOTION AND EDUCATION

- 17 locations' data were studied.
- Cost/HH ranged from \$0.02 to \$7
 - 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%

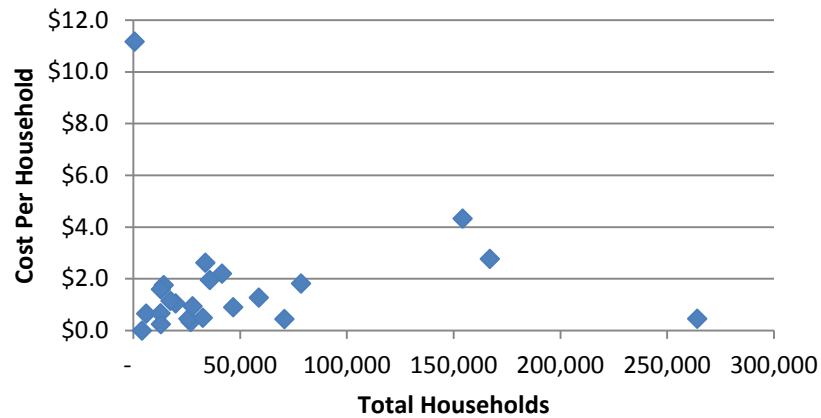
STUDY RESULTS – PROMOTION AND EDUCATION

- The five-year change in cost/HH charted:

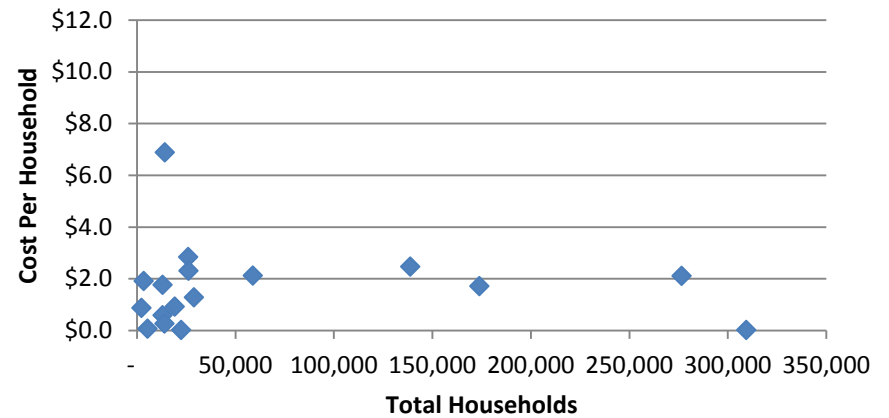


STUDY RESULTS – PROMOTION AND EDUCATION

2012 - P&E Cost/ HH vs Households



2017 - P&E Cost/ HH vs Households

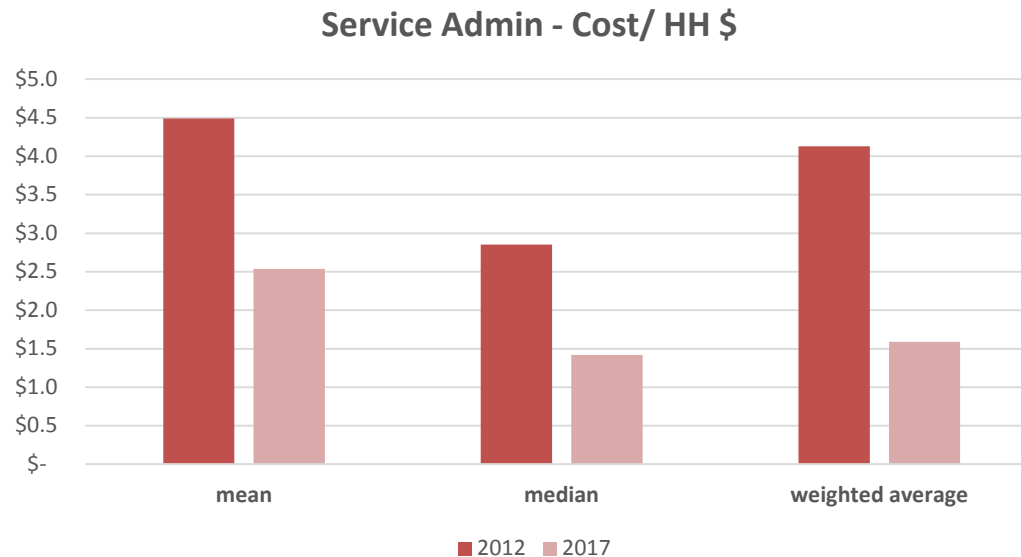


STUDY RESULTS – SERVICE ADMINISTRATION

- 17 locations' data were studied.
- Cost/HH ranged from \$0.18 to \$8
 - 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%

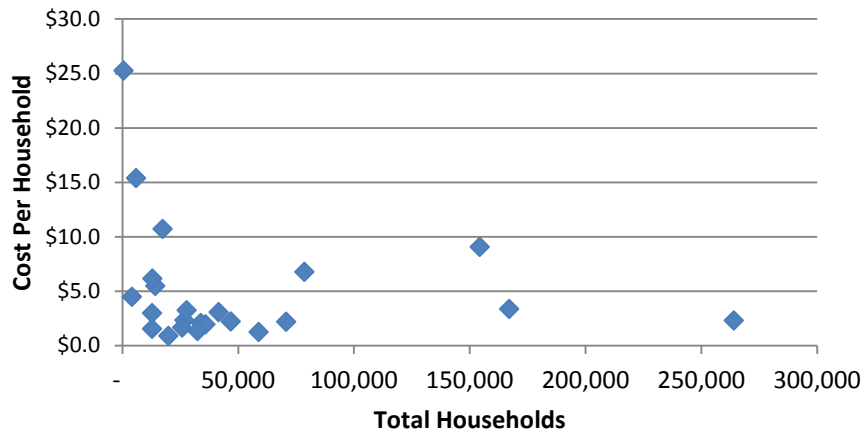
STUDY RESULTS – SERVICE ADMINISTRATION

- The five-year change in cost/HH charted:

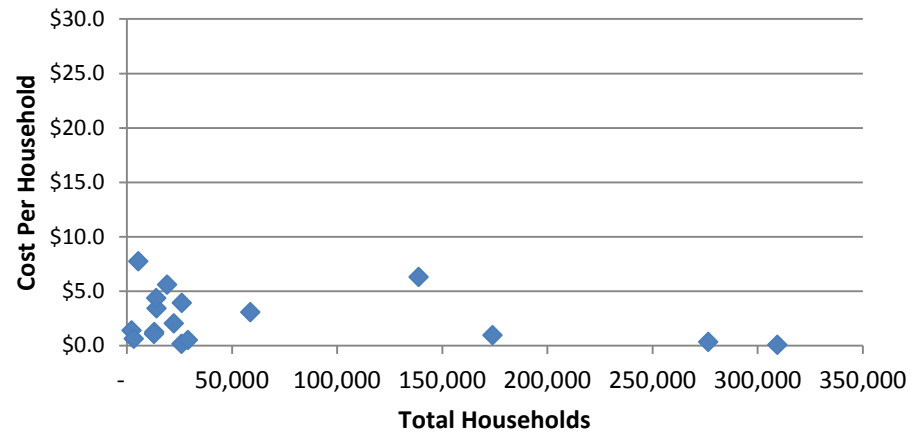


STUDY RESULTS – SERVICE ADMINISTRATION

2012 - Service Admin. Cost/ HH vs Households



2017 - Service Admin. Cost/ HH vs Households



TOP UP PAYMENT METHODOLOGY

- Recycle BC built the P&E and Service Administration offers in the following manner:
 - Started with the current base rates and proposed new rates for consultation that took into account:
 - Changes in administrative activities since original SOW was written,
 - Jurisdictional scan of P&E and service administration payment rates,
 - Scan of local government P&E activities by collection type.
 - Considered all of the factors described in the previous seven slides to determine if any adjustment to the proposed rates should be made.

TOP UP PAYMENT DECISION

○ Promotion and Education:

- No change from the current rate - \$0.75 per household was proposed.
- For the depot top up (additional resident education for plastic bags, foam packaging and glass) no change from the current rate - \$0.25 per household was proposed.
- It was noted in the Cost Study that recycling P&E typically shares space with other programs and accurate cost allocations are difficult.

○ Service Administration:

- Based on the feedback provided, the differential between collectors using “in-house” collection staff and collectors using contractors has been eliminated.

TOP UP PAYMENTS

| | Top Ups - \$ per HH | | |
|--------------|---------------------|---------|------------------------|
| | Resident Education | Depot | Service Administration |
| Curbside | \$ 0.75 | \$ 0.25 | \$ 1.75 |
| Depot | \$ 0.75 | n/a | \$ 1.75 |
| Multi-family | \$ 1.00 | \$ 0.25 | \$ 1.25 |



FINANCIAL INCENTIVES & PAYMENT METHODOLOGY

Summary

SUMMARY

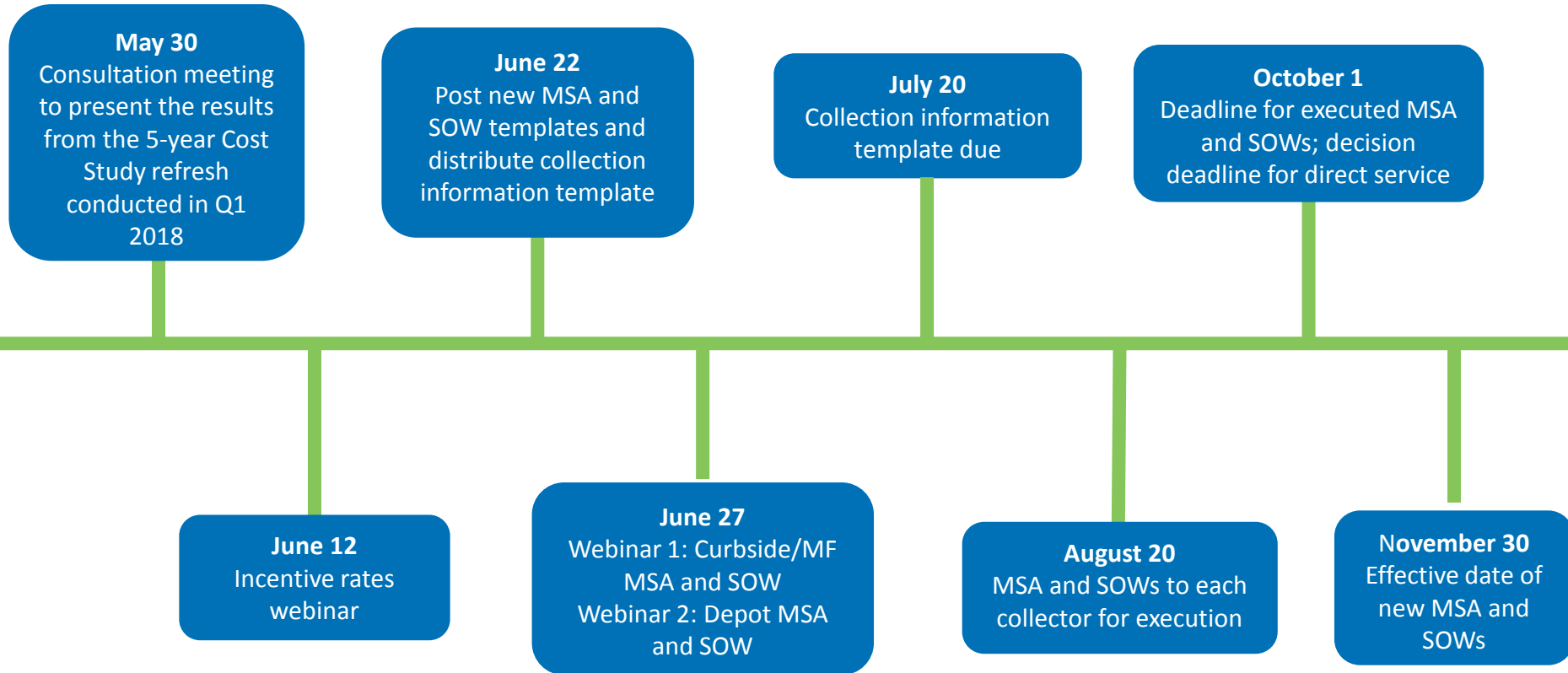
- In summary, Recycle BC would like to thank all of the collectors who participated in the consultation and those who participated in the cost study.
 - While 900+ comments were provided during the consultation, there wasn't specificity as to what the new rates should be vs. the proposed rates and why. We did read all of the feedback provided and discussed it while determining the final incentive offers.
 - Recycle BC recognizes that the cost study did not provide a robust data set, commits to a broader cost study for the next cycle of Services Agreements and is hopeful that more collectors will share their actual costs.
 - We are looking forward to working with our collectors – recycling even more in the next five years for BC.
-



TIMELINE

Services Agreement

TIMELINE FOR SERVICES AGREEMENTS





QUESTIONS



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[@RecycleBC](https://facebook.com/RecycleBC)

DEPOT AGREEMENT REVIEW

Recycle BC Webinar

JUNE 27, 2018



RECYCLEBCTM

WELCOME

- Welcome
- Speaker – Jordan Best – Director, Collection
- Presenting live via webcast
- Will take questions at the end, assisted by:
 - ♻️ Tamara Burns – VP Supply Chain
 - ♻️ Tiffany Sung – Coordinator, Collection
- Please type questions into Q+A section

WORKSHOP AGENDA

- Background and context
- Timeline and process – new agreements
- Information template
- Depot SOW – Overview of changes
- Master Services Agreement
- Other Flexible Plastic Packaging (OFPP)
- Final incentive rates
- Review of deadlines
- Questions and answers



BACKGROUND

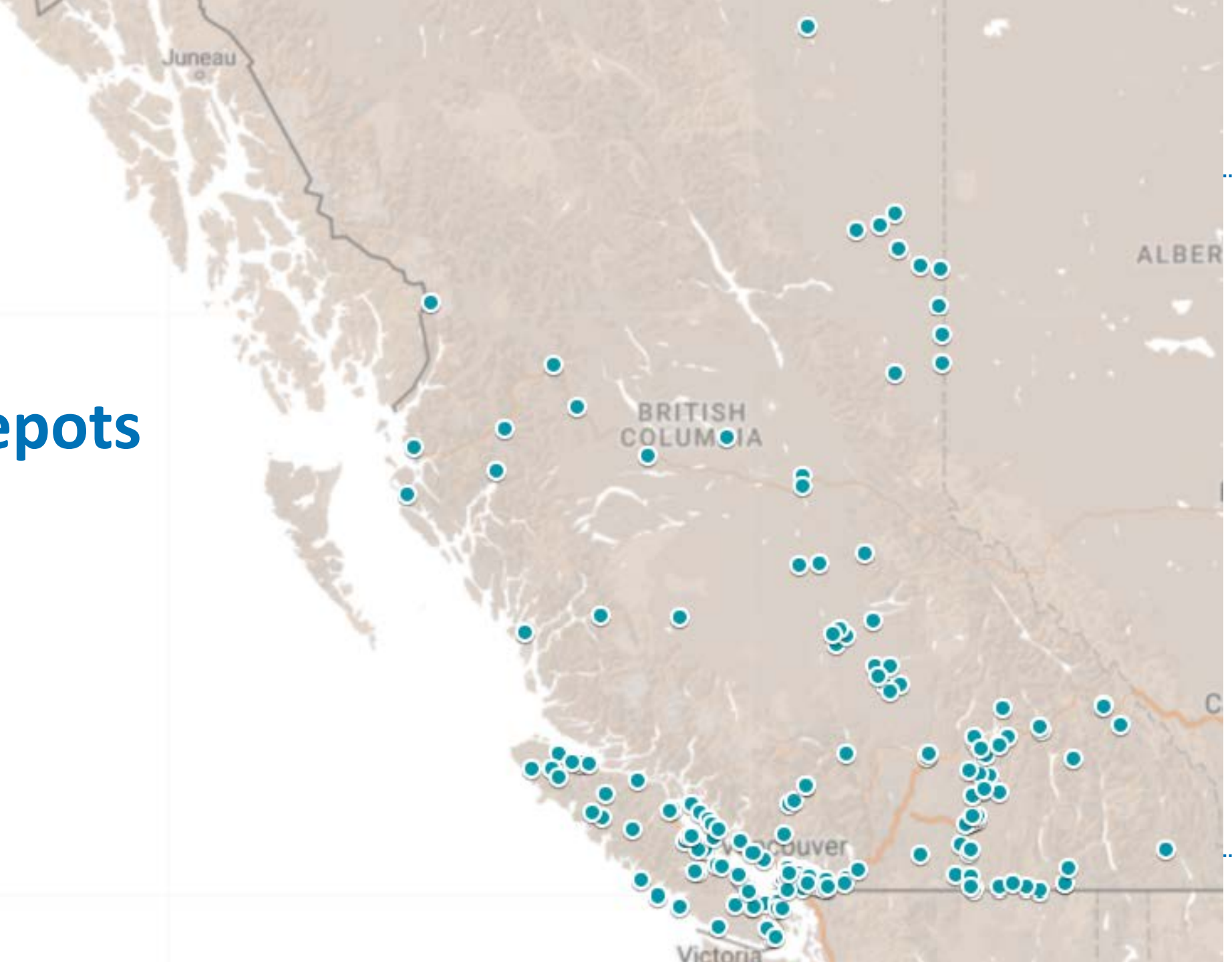
Depot Collection

DEPOT COLLECTORS

| Collector Type | Number of Depots |
|------------------|------------------|
| Local Government | 108 |
| First Nations | 5 |
| Private Company | 88 |
| Retail Location | 50 |
| Total | 251 |



Recycle BC Depots





NEW AGREEMENTS

Timeline and Process

KEY MILESTONES TO DATE

- November 2017 – Two day consultation event in New Westminster
- Written comment period after consultation event
- Recycle BC review of feedback and 5 year cost study
- May 30, 2018 – Consultation webinar and meeting at RCBC conference to present 5 year cost study results
- June 12, 2018 – Webinar on final incentive rates
- June 22, 2018 – Release of final Depot Statement of Work (SOW) to collectors
- June 27, 2018 – Today's webinar on Depot SOW

- End of November 2018 – majority of Depot SOW's expire

NEW AGREEMENTS – TIMELINE

- June 22, 2018 – Release of final Depot Statement of Work (SOW) and new offer to collectors
 - RecycleBC.ca/collector-agreement-renewal
 - Offer extends to all depot locations currently included in the Recycle BC program
- **July 20, 2018** – Deadline to submit Information Template
- **October 1, 2018** – Deadline to submit signed SOW
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- **If the above deadlines are not met, Recycle BC cannot guarantee inclusion in the program**
- By not submitting a signed SOW by October 1, 2018, Recycle BC will consider the offer to sign a new agreement not accepted
- Collectors who do not wish to sign a new SOW with Recycle BC have the option to continue to collect packaging and paper independent of the Recycle BC program

COLLECTORS ON ALTERNATIVE TIMELINE

- Small number of collectors have Depot SOW that extend past November 2018
- Recycle BC encourages applicable collectors to transition to new agreements to ensure consistency and to take advantage of increased incentive rates
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- TBD– End date of new SOW

- Please contact Recycle BC to discuss potential timelines



INFORMATION TEMPLATE

Submission Process

INFORMATION TEMPLATE - BACKGROUND

- Information template document (spreadsheet) included in June 22 email to collectors
- Posted at: RecycleBC.ca/collector-agreement-renewal
- SOW distributed and posted is final template version, but should not be signed
- Information template is required to gather necessary info on your organization so that Recycle BC can return an executable version for your signature
- Sooner we receive, sooner we can return an executable version for review and signature
- Indicate important dates such as Board or Council meeting in submission
- **July 20, 2018** – Deadline to submit Information Template
- Submission of an Information Template to Recycle BC does not constitute a formal acceptance of this offer and in no way obligates you to sign a new SOW with Recycle BC.
- The information is simply needed to draft an executable SOW for your consideration.

SUBMISSION INSTRUCTIONS

- Review instructions and checklist on “Checklist” tab
- Complete all tabs relevant to your organization
 - Depot only collectors – “General” and “Depot” only tabs
- Grey fields – include necessary information
- Red fields – Intended to illustrate the incentive rates likely to apply to your organization
 - Based on information submitted in other sections
 - Subject to review and validation by Recycle BC
 - Will not be visible if sections left blank
- Questions – Direct to Tiffany Sung at tsung@recyclebc.ca
- Recycle BC will review and follow up with any questions or further information required
- Once reviewed and validated, Recycle BC will send executable SOW for signature
- **July 20, 2018** – Deadline to submit Information Template

Introduction

The information collected in this template will be reviewed and used to draft the Master Services Agreement (MSA) and applicable Statements of Work (SOW) between your organization and Recycle BC. All questions and information requests in this template are designed in accordance with the MSA and the SOW(s) for Curbside, Multi-family, and Depot collectors, available from Recycle BC. **If your current agreement expires at the end of November 30, 2018, the deadline for submitting this template is July 20, 2018.** Please refer to the 'Summary Submission Checklist' to ensure you have completed and provided the necessary information tabs, forms, and attachments. To access the applicable forms, follow the links below or click on the coloured tabs at the bottom of this spreadsheet. If you have any questions regarding the completion of this template, please contact Tiffany Sung, at TSung@Recyclebc.ca, for assistance.

| Summary Submission Checklist - required for agreements | Form Link | Applicable to following collectors: |
|---|---|-------------------------------------|
| Have I completed all sections of the General Information Form? | General Information Form | All |
| Have I completed all applicable Curbside/Multi-Family/Depot Information form? | Curbside Information Form | Curbside |
| | Multi-family Information Form | Multi-family |
| | Depot Information Form | Depot |
| Have I completed the Curbside/Multi-family ICI Information Form ? (If ICI is applicable) | Curbside ICI - Information Form | Curbside |
| | Multi-family ICI - Information Form | Multi-family |
| Have I completed the Household Baseline Information Form? | Household Baseline - Information Form | Multi-family |
| Have I attached the completed Electronic Fund Transfer (EFT) form to my email? | EFT - Form | All |
| Have I attached a copy of a VOID cheque or Banking Form to my email? | Attach Copy of VOID cheque or Banking Form | All |
| Have I attached a copy of a Proof of Insurance (MSA - Section 12.1) to my email? | Attach Copy of Proof of Insurance | All |

| Auxiliary Attachments - information not required for agreements but strongly encouraged | Applicable to following collectors: |
|---|-------------------------------------|
| Collection Schedule (i.e: brochure, webpage link, etc.) | Curbside |
| Service Area Map (i.e: route map from collection calendar, Shape files with KML/KMZ extension) | Curbside |

*Important Information

If your current agreement expires before November 30, 2018, the deadline for submitting this template is **July 20, 2018**.

[Please send all submissions to TSung@RecycleBC.ca before the deadline](mailto:TSung@RecycleBC.ca)

Note that on the applicable General, Curbside, Multi-family and Depot tabs you will only be required to complete fields highlighted in grey.

KEY INFORMATION

- Contact information – formal notice, operations, claim reports, EFT notices
- Depot in community with or without curbside/MF service – 80% threshold
- Depot only households – Local governments only
- List of Principle Depots and Satellite Depots – offer extends to depots currently in program
- ICI Management Option – indicate for each depot
- In-Scope PPP – indicate for each depot

- Instructions and SOW references included in document
- Questions – Direct to Tiffany Sung at tsung@recyclebc.ca



DEPOT SOW

Overview of Changes

FINAL CHANGES - RATIONALE

- Final changes were guided by the following rationale:
 - Operational efficiency and effectiveness
 - Value for Recycle BC stewards
 - Addressing operational challenges - collection and post-collection
 - Environmental responsibility
 - Fostering accountability
 - Balancing needs of all stakeholders, including residents
 - Feedback received during consultation event and written period
- Following slides are overview of select changes only – review SOW for further details and exact language
- Language included in this presentation is NOT a representation of SOW language



DEPOT COLLECTION IN CURBSIDE COMMUNITIES

- Proposed at consultation event to eliminate payment for paper, cardboard and containers to local government depots in communities where all or vast majority of residents have access to:
 - Curbside or multi-family PPP collection
 - Unlimited volumes of paper, cardboard and containers accepted at their resident's collection site
 - Weekly or biweekly collection at household
- Rationale – duplication of service, drives up cost/tonne of program, increased environmental footprint etc.
- Recycle BC received significant feedback on this issue
- Completion of survey at a number of local government depots
- Recycle BC not moving forward with this proposal

PRINCIPAL AND SATELLITE DEPOTS

- Definitions included of Principal and Satellite Depots
- *Principal Depots* – Approved Depot where PPP is picked up by Designated Post-Collection Service Provider
- *Satellite Depots* – Approved Depot from which Contractor transports PPP to designated Principal Depot
- Key differences and requirements outlined for both depot types
- Locations to be listed in Attachment 2.1.1 – Approved Depots
- Intent is to track satellite locations and associated approvals in actual agreements
- Satellite locations remain subject to approval of Recycle BC and all associated requirements (staffing, security, contamination monitoring, ICI management etc.)

ICI MATERIALS MANAGEMENT

- ICI Management Option will now be tracked in Attachment 2.1.1 – Approved Depots for each applicable depot, not in separate document
- ICI Management Options:
 - Option 1 – Separation of Household and ICI PPP
 - Option 2- No Collection of ICI PPP
 - Option 3 – Calculation of Mix of Household and ICI PPP
 - Option 4 – Automatic Deduction of Fixed ICI Percentage
- Detailed definition and implications outlined in Depot SOW, including post-collection cost implications of Option 3 and 4
- All procedures subject to review by Recycle BC
- Collector may request change at later date
- Recycle BC may require change if determine associated procedures are not being applied
- Requested option(s) should be outlined in Information Template

IMPROVING DEFINITIONS AND INTENT

- Number of changes were made to clarify original intent and outline original requirements in a more complete and logical manner
- Staffing – Definition of “fully staffed” included as well as associated monitoring requirements
- Securely fenced/locked – Definition included
- Temporary Collection Site – Definition and approval process outlined
- Storage of materials – Recycle BC may request depot to adopt procedures to ensure PPP is protected from rain, snow and inclement weather to protect marketability
- Customer service reports – submission requirement removed
- Beverage containers – deemed in-scope if comingled with PPP
- Depot Only Households – detailed definition included to assist in determining number

- GHG – Requirement to provide associated metrics bi-annually

PROMOTION AND EDUCATION

- Language included indicating Recycle BC can exercise its right to require advance approval of significant promotion and education materials
 - Examples include:
 - Depot signs
 - Advertisements
 - Website content
 - Primary concern is accuracy and consistency
 - Recycle BC templates are available but not mandatory
- Resident Education Top-Up:
 - If received, total must be spent on promotion, education and outreach on an annual basis



MASTER SERVICES AGREEMENT

- No changes to body of Master Services Agreement (MSA)
- Existing MSA remains in effect
- Dispute resolution process is included in MSA
- Schedule 4.2, Section 2 – PPP Material Types
 - To be updated for consistency and for inclusion of OFPP



OTHER FLEXIBLE PLASTIC PACKAGING

Pilot and New Agreements

OTHER FLEXIBLE PLASTIC PACKAGING

- Also referred to as “multi-laminated plastic packaging”
- Essentially the types of film and flexible plastics that are not currently captured under our current Plastic Bag and Overwrap category
- Major categories:
 - Stand up and zipper lock pouches
 - Crinkly wrappers and bags
 - Flexible packaging with plastic seal
 - Woven and net plastic bags
 - Non-food protective packaging



OTHER FLEXIBLE PLASTIC PACKAGING

- June 1, 2018 – Voluntary OFPP launch with 115 depots
- September 1, 2018 – Second voluntary launch, registration ongoing
- January 1, 2019 – Mandatory launch for all depots under new Depot SOW
- Each depot will receive the following:
 - Other Flexible Plastic Packaging depot signs
 - Other Flexible Plastic Packaging rack cards
 - Depot brochures
 - Sticker referencing the research and development project
- Each depot also has access to the following
 - Depot training manual, including material list and FAQs
 - Other Flexible Plastic Packaging decision making chart (8 ½" x 11")
 - Other Flexible Plastic Packaging vs. Plastic Bag and Overwrap properties sheet

WHY DO WE WANT TO COLLECT IT?

- Program Plan commitment:
 - Recycle BC's goal to collect all packaging types by 2017
 - To manage the collected packaging and paper according to the pollution prevention hierarchy
- Why this material?
 - Other Flexible Plastic Packaging is the fastest growing packaging type on the market
 - It is the largest category of packaging that isn't yet collected by Recycle BC
 - To stay in-step with the materials producers are supplying to the residential consumer

RESEARCH AND DEVELOPMENT

- Recycle BC's approach is to work with Merlin Plastics on research and development for a viable, stable commercial process at scale for the recycling of Recycle BC's Other Flexible Plastic Packaging
- To achieve incremental recovery of various plastic types such as PET, HDPE, PP, PE, etc.
- To conduct research and development, Merlin Plastics requires a clean stream of Other Flexible Plastic Packaging of sufficient quantity to run tests on the component parts of the multi-laminated material



Merlin Plastics

RESEARCH AND DEVELOPMENT

- Recycle BC's objectives of the project are:
 - Recycle some, if not all, of the materials categorized as Other Flexible Plastic Packaging over time to continue to maintain or exceed our 75% collection rate on behalf of Recycle BC members
 - Recover material not capable of being recycled – this will be done by processing the material into energy pellets, or engineered fuel, and marketed as an alternative to coal or other more carbon intensive fuels
 - Increase the amount of materials recycled and decrease the amount of material recovered and produced into engineered fuel as the technology is tested and refined

DEPOT SIGNAGE

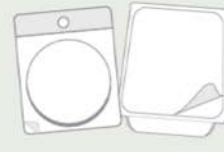
OTHER FLEXIBLE PLASTIC PACKAGING



Stand-up and Zipper Lock Pouches



Crinkly Wrappers and Bags



Flexible Packaging with Plastic Seal



Non-food Protective Packaging



Woven and Net Plastic Bags



Empty and clean packaging

Collection of Other Flexible Plastic Packaging is part of a research and development project.

For more information visit RecycleBC.ca/FlexiblePackaging.

NOT ACCEPTED

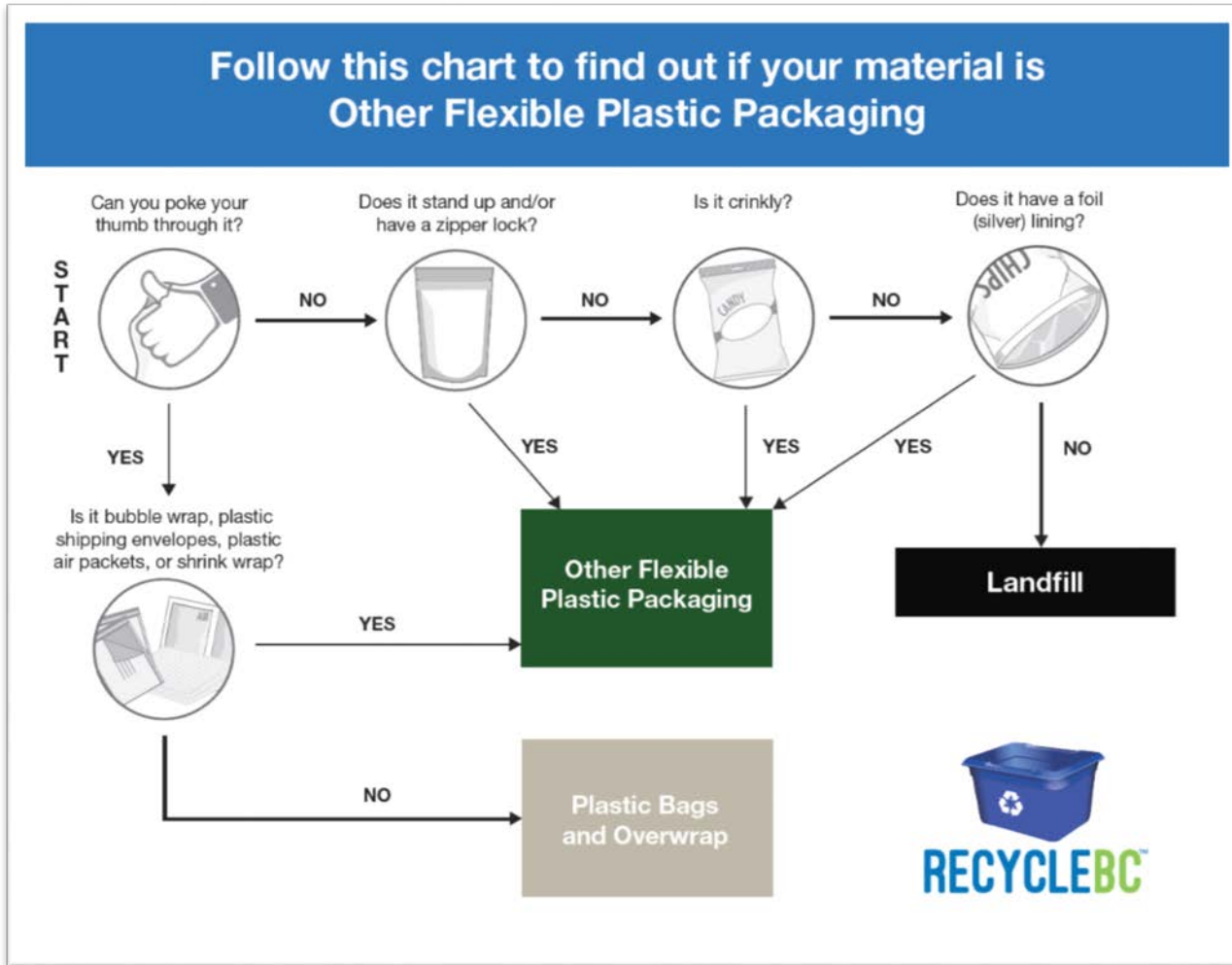
- ✗ Plastic Squeeze Tubes
- ✗ Plastic-lined Paper
- ✗ Paper-lined Plastic
- ✗ Plastic Strapping
- ✗ 6-pack Rings
- ✗ Biodegradable Plastic
- ✗ PVC/Vinyl
- ✗ Plastic Shopping Bags



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RecycleBC.ca

DEPOT RESOURCES



NOW ACCEPTED!

Other Flexible Plastic Packaging

NOT ACCEPTED

- Plastic Squeeze Tubes
- Plastic-lined Paper
- Paper-lined Plastic
- Plastic Strapping
- 6-pack Rings
- Biodegradable Plastic
- PVC/Vinyl
- Plastic Shopping Bags

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Other Flexible Plastic Packaging vs Plastic Bags and Overwrap

Characteristics of each category include:

| | |
|--|--|
| CRINKLY (e.g. candy wrappers) | NOT CRINKLY (e.g. overwrap on pop can flats) |
| DOESN'T STRETCH (e.g. cereal bags) | CAN POKE YOUR THUMB THROUGH IT (e.g. overwrap on toilet paper) |
| FOIL LINING (e.g. chip bags) | BULK (e.g. bulk or produce bags) |
| SEALED FOR FRESHNESS (e.g. stand-up pouches) | FOR CARRYING/KEEPING CLEAN (e.g. plastic shopping bags) |

Collection of Other Flexible Plastic Packaging is part of a research and development project to enable us to recycle this material. During this time, material that is unable to be recycled will be recovered and produced into polymerized fuel. For more information visit recyclebc.ca/otherflexibleplasticpackaging.



INCENTIVE RATES

Final Structure and Rates

DEPOT PAYMENT METHODOLOGY

- Recycle BC built the depot financial offers in the following manner:
 - Started with the current base rates and proposed new rates for consultation that took into account:
 - The performance and payment spread between material types and material groupings for collection,
 - The performance and payment spread between loose and baled collection activity,
 - Other inputs such as CPI, jurisdictional scan, and post-collection cost impact.
 - Considered feedback received during consultation process
 - Completed 5 year cost study
 - Put the final cost for depot collection into the 2019 budget.

DEPOT PAYMENT DECISION

- Recycle BC has changed some depot incentive payments since the initial proposal for the following reasons:
 - Paper and container material category payment rate increases remain as proposed; however this payment will be continued for depots that primarily service households with curbside/MF service.
 - Plastic bags/overwrap – keep increased rate from \$175/tonne to \$500/tonne
 - Other flexible plastic packaging – introduce permanent collection at \$500/tonne payment rate
 - Foam packaging – new: increase rate from \$175/tonne to ~~\$600/tonne~~ \$800/tonne to ensure that payment for a typical mega-bag quantity of foam is >\$5/bag
 - Glass containers – keep increase rate from \$80/tonne to \$90/tonne

DEPOT INCENTIVES

| Material Grouping | Categories | \$ /tonne | | |
|----------------------------|----------------------------------|---|--|-------------------------------|
| | | Depot in a Community Without Curbside/MF Collection | Depot in a Community With Curbside/MF Collection | Additional Incentive if Baled |
| Paper and Cardboard | Cat 1/Cat 2/Cat 3b Cat 1,2,3b | \$ 80 | \$ 60 | \$ 110 |
| Containers | Cat 3a/Cat 6/Cat 7 Cat 3a,6,7 | \$ 130 | \$ 90 | \$ 110 |
| Plastic Bags | Cat 4 | \$ 500 | \$ 500 | \$ 330 |
| White Foam | Cat 5 | \$ 800 | \$ 800 | \$ 330 |
| Coloured Foam | Cat 5 | \$ 800 | \$ 800 | \$ 330 |
| Glass Containers | Cat 8 | \$ 90 | \$ 90 | n/a |
| Other Flexible Plastic Pkg | Cat 9 | \$ 500 | \$ 500 | \$ 330 |



TIMELINE REVIEW

Key Dates

NEW AGREEMENTS – TIMELINE

- June 22, 2018 – Release of final Depot Statement of Work (SOW) and new offer to collectors
 - RecycleBC.ca/collector-agreement-renewal
 - Offer extends to all depot locations currently included in the Recycle BC program
- **July 20, 2018** – Deadline to submit Information Template
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QUESTIONS



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CURBSIDE & MF AGREEMENT REVIEW

Recycle BC Webinar

JUNE 27, 2018



RECYCLEBCTM

WELCOME

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- Timeline and process – new agreements
- Information template
- Curb and MF SOW – Overview of changes
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- Review of deadlines
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- June 27, 2018 – Today's webinar on Curbside and Multi-Family SOW
- June 29, 2018 – Target date to release final Multi-Family SOW

- End of November 2018 – majority of Curbside and MF SOWs expire

NEW AGREEMENTS – TIMELINE

- Curb and MF offer extends to all service areas currently included in the Recycle BC program
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- **July 20, 2018** – Deadline to submit Information Template

Introduction

The information collected in this template will be reviewed and used to draft the Master Services Agreement (MSA) and applicable Statements of Work (SOW) between your organization and Recycle BC. All questions and information requests in this template are designed in accordance with the MSA and the SOW(s) for Curbside, Multi-family, and Depot collectors, available from Recycle BC. **If your current agreement expires at the end of November 30, 2018, the deadline for submitting this template is July 20, 2018.** Please refer to the 'Summary Submission Checklist' to ensure you have completed and provided the necessary information tabs, forms, and attachments. To access the applicable forms, follow the links below or click on the coloured tabs at the bottom of this spreadsheet. If you have any questions regarding the completion of this template, please contact Tiffany Sung, at TSung@Recyclebc.ca, for assistance.

| Summary Submission Checklist - required for agreements | Form Link | Applicable to following collectors: |
|--|---|-------------------------------------|
| Have I completed all sections of the General Information Form? | General Information Form | All |
| Have I completed all applicable Curbside/Multi-Family/Depot Information form? | Curbside Information Form | Curbside |
| | Multi-family Information Form | Multi-family |
| | Depot Information Form | Depot |
| Have I completed the Curbside/Multi-family ICI Information Form ? (If ICI is app | Curbside ICI - Information Form | Curbside |
| | Multi-family ICI - Information Form | Multi-family |
| Have I completed the Household Baseline Information Form? | Household Baseline - Information Form | Multi-family |
| Have I attached the completed Electronic Fund Transfer (EFT) form to my email? | EFT - Form | All |
| Have I attached a copy of a VOID cheque or Banking Form to my email? | Attach Copy of VOID cheque or Banking Form | All |
| Have I attached a copy of a Proof of Insurance (MSA - Section 12.1) to my email? | Attach Copy of Proof of Insurance | All |

| Auxiliary Attachments - information not required for agreements but strongly encouraged | Applicable to following collectors: |
|---|-------------------------------------|
| Collection Schedule (i.e: brochure, webpage link, etc.) | Curbside |
| Service Area Map (i.e: route map from collection calendar, Shape files with KML/KMZ extension) | Curbside |

*Important Information

If your current agreement expires before November 30, 2018, the deadline for submitting this template is **July 20, 2018**.

[Please send all submissions to TSung@RecycleBC.ca before the deadline](mailto:TSung@RecycleBC.ca)

Note that on the applicable General, Curbside, Multi-family and Depot tabs you will only be required to complete fields highlighted in grey.

KEY INFORMATION

- Contact information – formal notice, operations, claim reports, EFT notices
- Curbside and MF household baselines
- ICI locations – list in applicable tab
- Container type (curbside only)
- Description of service area
- List of MF buildings
- Inclusion of segregated glass
- Auxiliary information – service area map, collection schedule

- Instructions and SOW references included in document
- Questions – Direct to Tiffany Sung at tsung@recyclebc.ca



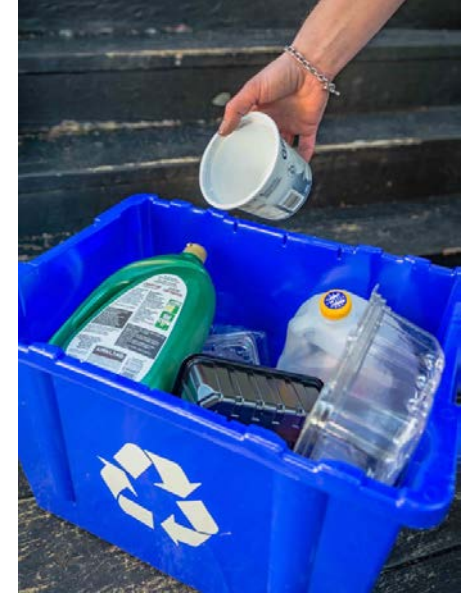
CURBSIDE & MF SOW

Overview of Changes

FINAL CHANGES - RATIONALE

- Final changes were guided by the following rationale:
 - Operational efficiency and effectiveness
 - Value for Recycle BC stewards
 - Addressing operational challenges - collection and post-collection
 - Environmental responsibility
 - Fostering accountability
 - Balancing needs of all stakeholders, including residents
 - Feedback received during consultation event and written period

- Following slides are overview of select changes only – review SOW for further details and exact language
- Language included in this presentation is NOT a representation of SOW language



IMPROVING DEFINITIONS AND INTENT

- Number of changes were made to clarify original intent and outline original requirements in a more complete and logical manner
 - Replacement of term “Non-PPP” with “Not Accepted Materials”
 - Explicit indication that plastic bags and overwrap, foam packaging and OFPP may not be included
 - ICI locations – subject to approval by Recycle BC, collector must cover post-collection cost
 - Procedures required to monitor/reject material set out, subject to Recycle BC review
 - Beverage containers – deemed in-scope if comingled with PPP
-
- GHG – Requirement to provide associated metrics bi-annually

Mis-Sorted Materials (Cross-Contamination)

- Thresholds for mis-sorted materials or cross-contamination in multi-stream programs
 - Cross-contamination is a significant operational issue
 - Paper/cardboard markets are becoming increasingly stringent
 - Not addressed by current agreements
 - Limit of paper/cardboard in container stream – **3%** by weight
 - Limit of containers in paper/cardboard stream – **1%** by weight
- Threshold for other materials in segregated glass stream
 - Increases post-collection cost and reduces ability to market glass
 - Requires diversion of glass away from “bottle to bottle” type markets
 - Issue often due to vehicle issues, not resident behavior
 - Limit of 1.5% by weight
 - May be subject to Service Level Failure Credits



BULK HEAD FAILURES

- Consulted on proposal to require collection drivers to assist in cleaning up bulk-head failures or high levels of cross contamination at receiving facility or collector charged for associated cost
 - Bulk-head failures result from:
 - Driver error
 - Mechanical damage
 - Equipment design and/or shortfalls in equipment performance
 - Impact on receiving facilities:
 - Cost
 - Down-time
 - Delays for other drivers
- Proposal replaced with \$1,000 per incident (bulk head failure) Service Level Failure Credit



RECEIVING FACILITY

- Collectors to follow all reasonable instructions and procedures while delivering collected PPP to facility – health and safety, weigh scale operation etc.
- Collectors must coordinate directly with post-collection service provider for delivery of PPP when collection scheduled on a holiday – 10 days in advance
- Designated post-collection facility location if not within 60 km – mutually acceptable terms
- Consolidation of material prior to delivery is subject to approval by Recycle BC and all applicable conditions and procedures
- If load rejected due to greater than 3% non-PPP, alternative procedures may be required and associated costs deducted



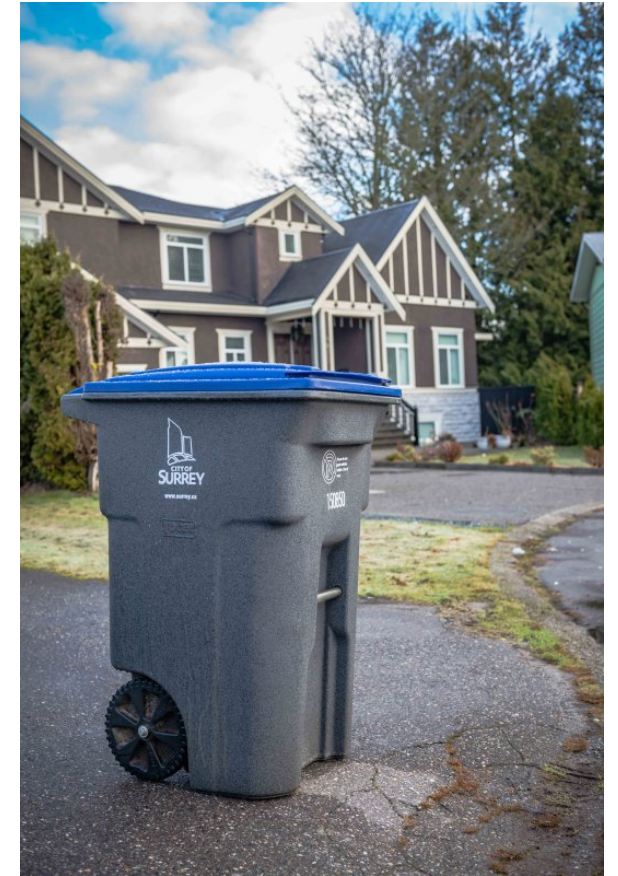
SINGLE USE (BLUE) BAGS

- Includes required timeline to transition away from single use bags by **July 1, 2020**
 - Disadvantages of single use bags as collection containers:
 - Post-collection cost and health and safety impact
 - Generates waste each collection day
 - Added challenge of policing contamination
 - Requires purchase by residents
 - Contradicts messaging on exclusion of plastic bags
 - Reusable containers:
 - To be provided to residents by collectors, unless otherwise approved by Recycle BC
 - Container type at discretion of collector – boxes, bags, bin with lid, cart etc.
 - Recycle BC recommends against transition to automated cart
 - Transition plan required in advance



CONTAINER TYPE CHANGES

- Changes to container types subject to approval by Recycle BC
 - Container type can have significant impact on contamination rate
 - Transition plan required and should include:
 - Rationale for change
 - Timelines
 - Roles and responsibilities
 - Actions to communicate change to residents
 - Pre and post-transition contamination remediation
 - Approval will not be unreasonably withheld



PROMOTION AND EDUCATION

- Recycle BC can exercise its right to require advance approval of significant promotion and education materials
 - Examples include recycling guides, oops stickers, website content
 - Primary concern is accuracy and consistency
 - Recycle BC templates are available but not mandatory
- Consulted on proposal to require inclusion of Recycle BC logo on collection containers
 - Not included in agreement
 - Replaced with language indicating only collector, applicable local govt, sub-contractor or Recycle BC logos may be included (but not required)
- Resident Education Top-Up:
 - If received, total must be spent on promotion, education and outreach on an annual basis



ESCALATED SERVICE LEVEL FAILURE CREDITS

- Due to global market conditions demanding significantly stricter quality standards, and the China Ban impact on the marketing of paper worldwide, the following change was made to the Service Level Failure Credit (SLFC) for >3% non-accepted material contamination:
 - Addition of new tier to the SLFC process for curbside collectors with greater than 25,000 households
 - Will include a year-over-year stepped increase to the value of the SLFC when the collector has received a SLFC and in the subsequent year(s) and does not decrease contamination in their service area to 3% or less
 - Year 1 - \$5,000 per load, Year 2 - \$10,000 per load, Year 3 - \$15,000 per load, Year 4 & 5 - \$20,000 per load
 - If SLFC not applied in a year, reverts back to Year 1 value
 - Maximum of 24 loads per year remains
 - Applicable to curbside only

BONUS THRESHOLDS

- Annual bonus thresholds lowered by 20 kg to encourage increases in PPP capture rate
- Recycle BC reserves the right to develop and apply a methodology to net-out average non-accepted material from bonus calculation

Curbside

| Performance Level | Annual kg/HH | \$ per Curbside household |
|-------------------|--------------|---------------------------|
| 1 | 160-179 | \$1 |
| 2 | 180-199 | \$2 |
| 3 | 200-219 | \$3 |
| 4 | >220 | \$4 |

Multi-Family

| Performance Level | Annual kg/household | \$ per MF household |
|-------------------|---------------------|---------------------|
| 1 | 80-89 | \$0.50 |
| 2 | 90-99 | \$1.00 |
| 3 | 100-109 | \$1.50 |
| 4 | 110-119 | \$2.00 |
| 5 | 120-129 | \$2.50 |
| 6 | >130 | \$3.00 |

MASTER SERVICES AGREEMENT

- No changes to body of Master Services Agreement (MSA)
- Existing MSA remains in effect
- Dispute resolution process is included in MSA
- Schedule 4.2, Section 2 – PPP Material Types
 - To be updated for consistency and for inclusion of OFPP



INCENTIVE RATES

Final Structure and Rates

INCENTIVE METHODOLOGY

- Recycle BC built the curbside and multi-family financial offers in the following manner:
 - Started with the current base rates and proposed new rates for consultation that took into account:
 - The performance and payment spread between single stream and multi-stream collection,
 - The performance and payment spread between collection container type,
 - Other inputs such as CPI, post-collection cost impact, bonus structure and top-ups.
 - Considered feedback received during consultation process
 - Completed 5 year cost study
 - Put the final cost for depot collection into the 2019 budget.

CURBSIDE INCENTIVES

| Service Area Density (Households/Hectare) | Incentive Rate (\$/HH/Year) |
|--|-----------------------------|
| Group 1 - Single Stream collectors using automated carts – 4% | |
| > 2 HH/Hectare | \$33.40 |
| 0.2-2 HH/Hectare | \$35.40 |
| < 0.2 HH/Hectare | \$37.40 |
| Group 2 - Single Stream collectors using other container types – 8% | |
| > 2 HH/Hectare | \$34.50 |
| 0.2-2 HH/Hectare | \$36.65 |
| < 0.2 HH/Hectare | \$38.80 |
| Group 3 - Multi-Stream collectors – 10% | |
| > 2 HH/Hectare | \$38.45 |
| 0.2-2 HH/Hectare | \$40.65 |
| < 0.2 HH/Hectare | \$42.80 |

MULTI-FAMILY INCENTIVES

| Multi-Family Collector Type | Incentive Rate (\$/HH/Year) |
|-------------------------------|-----------------------------|
| Single Stream Collectors – 8% | \$18.30 |
| Multi-Stream Collectors – 10% | \$21.90 |

TOP UP RATES

Curbside

| | Top-Up Rate (\$/HH/Year) |
|------------------------|--------------------------|
| Resident Education | \$0.75 |
| Depot | \$0.25 |
| Service Administration | \$1.75 |

Multi-Family

| | Top-Up Rate (\$/HH/Year) |
|------------------------|--------------------------|
| Resident Education | \$1.00 |
| Depot | \$0.25 |
| Service Administration | \$1.25 |



TIMELINE REVIEW

Key Dates

NEW AGREEMENTS – TIMELINE

- **July 20, 2018** – Deadline to submit Information Template
- **October 1, 2018** – Deadline to submit signed SOW
- November 30, 2018 – Effective date of new SOW
- December 31, 2023 – End date of new SOWs (5 year and one month term)

- **If the above deadlines are not met, Recycle BC cannot guarantee inclusion in the program**
- By not submitting a signed SOW by October 1, 2018, Recycle BC will consider the offer to sign a new agreement not accepted
- Collectors who do not wish to sign a new SOW with Recycle BC have the option to continue to collect packaging and paper independent of the Recycle BC program



QUESTIONS



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July 2018

**Consultation on Revised
Program Plan – Phase II**



Steward Consultation on Recycle BC Program Plan, July 17, 2018

| # | Sector | Question | Answer | Reflected in Revised Program Plan or Other Documents |
|----|----------------------|--|--|---|
| 1. | Steward | Will the Environmental Management Act be amended to support the expanded definition of obligated material as outlined in the draft Program Plan? | <p>The Ministry considers the current definition of packaging, as it is found in the Environmental Management Act, sufficient to designate packaging-like product that is used to protect, contain or transport a commodity or substance, under Schedule 5 in the Recycling Regulation.</p> <p>With respect to plastic single-use items, bringing these materials under an Extended Producer Responsibility program for their management is a logical and effective province-wide approach that is supported by the Ministry of Environment and reflects Recycle BC's members' plastics recycling objectives as well as a key policy approach for meeting Canada's commitments on plastics as set out in the G7 Plastics Charter. That said, we welcome feedback from stewards and other stakeholders on inclusion of single-use plastic items in the revised Plan. Based on stakeholder feedback, the Ministry will decide if the Act or the Regulation will be amended to more clearly articulate single-use items, as is being contemplated in other jurisdictions.</p> | Part 1 of the Environmental Management Act, definition of 'packaging' . |
| 2. | Industry Association | Regarding the broadened scope of the program, can you please confirm that straws are now an obligated material? And can you clarify that this includes the straw that comes with a juice box | We will be providing stewards with more specific guidance with respect to all designated material in the coming months. But our initial conversations with the Ministry of Environment | Part 3, Section 3.1 of Packaging and Paper Product Extended Producer Responsibility Plan (July 2018). |



Steward Consultation on Recycle BC Program Plan, July 17, 2018

| # | Sector | Question | Answer | Reflected in Revised Program Plan or Other Documents |
|----|----------------------|--|--|---|
| | | which would require the steward to report the juice box and the straw separately? | indicate that straws, including those attached to a juice box, will be a designated material. | |
| 3. | Industry Association | What is the rationale for obligating single-use plastics for the 2019 report (based on 2018 sales) when the forthcoming implementation of municipal bans will mean a decline in the distribution of these materials? | We acknowledge that some jurisdictions may be taking action to address specific single-use plastic products as part of a local response to the growing concern about plastic pollution. However, local bans do not preclude the need for a more comprehensive approach to addressing these items. Bringing these materials under an Extended Producer Responsibility program for their management is a logical and effective province-wide approach that is supported by the Ministry of Environment. | Part 3, Section 3.1 of Packaging and Paper Product Extended Producer Responsibility Plan (July 2018). |
| 4. | Industry Association | Much of the contamination found in streetscape collection is single-use plastics. How will Recycle BC manage this material now that it is obligated if it is currently considered a contaminant in the system? | The first priority for Recycle BC is to develop the complete list of designated materials and then identify which of those materials might pose a challenge in our supply chain. Once we understand which items are problematic, the Recycle BC team will take an approach similar to the tubes pilot project and work with our supply chain partners to explore technologies to manage these materials through the recycling system. Read more about our tubes pilot project here: RecycleBC.ca/Tubes | N/A |
| 5. | Steward | Can you explain why Recycle BC is choosing to follow EU targets that can be applied nationwide in each EU country for one province? Would it | Recycle BC's overarching goal is continuous improvement. Given that the program has been consistently achieving the 75% recovery rate as required by the Recycling Regulation, | Section 5.3.2 of the Packaging and Paper Product Extended Producer |



Steward Consultation on Recycle BC Program Plan, July 17, 2018

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



Steward Consultation on Recycle BC Program Plan, July 17, 2018

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



Steward Consultation on Recycle BC Program Plan, July 17, 2018

| # | Sector | Question | Answer | Reflected in Revised Program Plan or Other Documents |
|-----|----------------------|--|--|--|
| | | | from streetscape has a very high level of contamination compromising its ability to be recycled. Despite these early results, Recycle BC is committed to continuing to work in partnership with local governments to perform further research through streetscape collection projects to determine how recovery of packaging and paper can occur under the new restricted global marketing conditions. More information about this pilot project is available here: Streetscape Pilot Project Report . | |
| 12. | Steward | Are any of the proposed changes to the Program Plan going to affect stewards and if so, how? | The proposed updates to the program plan will impact stewards in a number of ways which we are happy to discuss with you. Please feel free to contact Recycle BC at 1-888-980-9549 or stewards@recyclebc.ca . Most notably, stewards will be reporting against an expanded scope of obligated materials and Recycle BC will provide stewards with the list of designated materials in the coming months. The new performance targets, provided in the plan, are also expected to increase program costs over time. More details about anticipated costs will be provided at the Annual Steward Meeting on October 24, 2018. Please stay tuned for more details. | |
| 13. | Industry Association | In the spirit of transparency and in line with Recycle BC's commitment to continuous improvement, why does Recycle BC not make available the information it uses to set annual fees? | Under the revised Program Plan, Recycle BC will begin by providing recovery rates for paper, plastic, metal and glass, as well as for rigid and flexible plastics. Based on the results of this first level of reporting, we will determine if it is | |



Steward Consultation on Recycle BC Program Plan, July 17, 2018

| # | Sector | Question | Answer | Reflected in Revised Program Plan or Other Documents |
|-----|----------------------|--|---|---|
| | | | <p>appropriate to provide further detailed recovery rate information, as the program matures.</p> <p>As for the inputs to fee setting, Recycle BC will consider your request to publish the information used to set fees.</p> | |
| 14. | Steward | <p>With respect to the challenge of local definitions, is there a federal/provincial/territorial process underway which is attempting to implement a national approach to extended producer responsibility? A national approach would lessen the burden on stewards who are required to adhere to different program structures implemented by different provinces.</p> | <p>We understand the need for harmonized definitions in order to simplify reporting obligations for stewards. It is our hope that the Plastics Charter and the federal government's plastics strategy will kick start the harmonization of definitions. We are also optimistic that the work being undertaken by the Canadian Council of Ministers of the Environment (CCME) will also help to advance the harmonization of definitions. In the meantime, CSSA remains focused on doing its part to provide stewards with a one-stop-shop platform of support services to help you fulfill your stewardship obligations in jurisdictions across Canada. This platform provides the option to use a standardized single 'national' material list when submitting reports to all provinces. In making this selection, stewards can report against one list and the WeRecycle system will map the national material to the relevant provincial program material.</p> | N/A |
| 15. | Industry Association | <p>Will Recycle BC work with local governments to determine a definition of compostable as currently</p> | <p>Recycle BC is committed to developing a harmonized definition of compostable. The Ontario government recently issued a draft</p> | <p>Part 5, Section 5.1 of the Packaging and Paper Product Extended Producer</p> |



Steward Consultation on Recycle BC Program Plan, July 17, 2018

| # | Sector | Question | Answer | Reflected in Revised Program Plan or Other Documents |
|---|--------|---|--|--|
| | | each local government defines it differently? | definition of “compostable” and Recycle BC will review this document with an aim to harmonizing the definition not only across local municipalities but also across provinces. Recycle BC will work with local governments to understand how this material is being managed through the collection and processing systems. Our first priority is to determine how much of this material is in the organics stream and how it is currently being managed. | Responsibility Plan (July 2018). |



Recycle BC Program Plan Collector Consultation, July 18, 2018

| # | Sector | Question | Answer | Reflected in Revised Program Plan or other Documents |
|----|------------------|---|--|---|
| 1. | Depot Operator | While we know Recycle BC is acting on the Ministry of Environment regulation which requires collection of residential packaging, the world expects collection and recycling of all plastic. The 75% diversion target ignores IC&I materials, plastic and non-packaging plastic products. This dilutes the actual diversion to perhaps 10% of the plastic available on the market. Much of the non-packaging plastic, such as laundry baskets and dustpans are sold by Recycle BC members. Will Recycle BC expand the scope of the program to collect all recyclable plastics? In our community, IC&I plastics go to the landfill for lack of a better option. To meet the Plastics Charter goal, we must look at the total picture. | Thank you for your feedback. The Environmental Management Act and Schedule 5 of the BC Recycling Regulation provide guidance on the designated materials for the Recycle BC program. As currently written this does not extend to durable household products such as laundry baskets and dustpans but we will forward your comments to the Ministry of Environment and Climate Change Strategy as part of this consultation. | Part 3, Section 3.1, Packaging and Paper Product Extended Producer Responsibility Plan (July 2018). |
| 2. | Local Government | Are wooden utensils and paper plates included as new obligated items now? | We anticipate that paper plates will be included as a designated material. We will be working with the Ministry of Environment and Climate Change Strategy over the coming months to determine the list of designated materials and will be providing guidance on that list following approval of the plan. | Part 3, Section 3.1, Packaging and Paper Product Extended Producer Responsibility Plan (July 2018). |
| 3. | Local Government | Section 4.1 of plan says that Recycle BC will focus on outcomes not process. Does that mean there will be more flexible collection | Recycle BC has always been open to the concept of contracted depot collectors operating satellite depots under our | Part 4, Section 4.3.8, Packaging and Paper Product Extended Producer |



Recycle BC Program Plan Collector Consultation, July 18, 2018

| # | Sector | Question | Answer | Reflected in Revised Program Plan or other Documents |
|----|------------------|--|---|---|
| | | schemes available to rural and small communities, such as a bulk drop-off from satellite depots? | program. The new version of our depot agreements which were recently released, as well as this new program plan, places a greater emphasis on this approach. | Responsibility Plan (July 2018). |
| 4. | Local Government | Can you please tell us if your First Nations consultant is working with Indigenous and Northern Affairs Canada (INAC) to collaborate on recycling initiatives? Many Kitimat-Stikine First Nations communities are currently working with INAC on PPP recycling initiatives and pilot projects. This process is in the early stages and so now is a good time for collaboration with Recycle BC on all these initiatives. | Recycle BC has had preliminary discussions with Indigenous Services Canada (ISC, formerly INAC) and will continue to work with them on recycling initiatives for First Nations communities. | Part 4, Section 4.3.9, Packaging and Paper Product Extended Producer Responsibility Plan (July 2018). |
| 5. | Local Government | Markets for recycling materials is a key issue and challenge, particularly recently. What research or actions is Recycle BC taking to guard against the lack of viable markets? | Identifying suitable end-markets for Recycle BC's materials is a central focus of our work right now and will continue to be as we face ongoing challenging market conditions. Despite these current challenges, Recycle BC does have some advantages with its program. One such advantage is that a large portion of materials are collected in multi-stream or depot-segregated collection systems which reduces the contamination level improving the marketability of the material. We are also fortunate to have a plastics recycler located in the province with whom we work closely to explore solutions to | Part 4, Section 4.4, Packaging and Paper Product Extended Producer Responsibility Plan (July 2018). |



Recycle BC Program Plan Collector Consultation, July 18, 2018

| # | Sector | Question | Answer | Reflected in Revised Program Plan or other Documents |
|----|------------------|--|---|--|
| | | | <p>addressing difficult to recycle plastics. This has enabled us to conduct the pilot project on recycling Other Flexible Plastics so that this material can be diverted from landfill and moved up through the pollution prevention hierarchy. We expect to continue this type of work to address other difficult-to-recycle plastics. For fibre materials, we are working with our post-collection service provider to identify suitable and certified end-markets for this material in order to understand current material specifications and how we can meet those requirements. This is part of Recycle BC's daily work and we are committed to finding suitable markets for the materials collected.</p> | |
| 6. | Local Government | Should there not be a section added to the plan that outlines a market development strategy to identify specific actions in this regard? | <p>There is no single strategy in the plan due to the ever-evolving market conditions. We have, through our post-collection service provider, a responsibility to market the recyclables collected and we are always exploring available markets and their material specifications. We are committed to ongoing research and development so that we can learn what developments and investments are needed to advance material up the pollution prevention hierarchy.</p> | <p>Part 4, Section 4.4, Packaging and Paper Product Extended Producer Responsibility Plan (July 2018).</p> |



Recycle BC Program Plan Collector Consultation, July 18, 2018

| # | Sector | Question | Answer | Reflected in Revised Program Plan or other Documents |
|-----|----------------------|---|--|---|
| 7. | Local Government | We support the addition of targets for individual material streams. Please confirm if foam is included in the rigid plastics target and if not, why did you decide to exclude extruded polystyrene foam? | Foam is included in the rigid plastics target. | Part 5, Section 5.3.2, Packaging and Paper Product Extended Producer Responsibility Plan (July 2018). |
| 8. | Depot Operator | What is the current recovery rate for foam packaging by Recycle BC? | Under the revised plan Recycle BC will publish the recovery performance for paper, plastic, metal and glass, as well as for rigid and flexible plastics. | |
| 9. | Local Government | On Page 21 in the Recycle BC 2017 Annual Report, there is data that outlines the portion of material that is recycled, the portion sent to energy from waste and the portion sent for disposal. This table indicates 11,568 tonnes is sent for disposal. Can you please clarify what is included in the material that is sent for disposal? | The 11,568 tonnes of material that was sent for disposal in 2017 includes both PPP and non-PPP -- for example, there will be a small amount of PPP that is too contaminated to recycle as well as non-PPP. We do not have data on the actual composition of the material sent to disposal. By observation, we know that most is material that residents believe belongs in their recycling bin but is not a designated or recyclable material and should have been placed in their garbage bin. Recycle BC commits significant efforts through its promotion and communication campaigns to educate residents on what does and does not belong in the recycling system in order to reduce the quantity of material sent to landfill. | Page 21, Recycle BC 2017 Annual Report |
| 10. | Industry Association | Page 21 of the 2017 Recycle BC Annual Report provides data regarding the quantity of | The 174,942 tonnes referenced in the 2017 Annual Report is the quantity of material | Page 21, Recycle BC 2017 Annual Report |



Recycle BC Program Plan Collector Consultation, July 18, 2018

| # | Sector | Question | Answer | Reflected in Revised Program Plan or other Documents |
|-----|----------------------|--|---|---|
| | | <p>material supplied into the marketplace by Recycle BC members (234,847 tonnes) and the total amount of material collected by Recycle BC (174,942 tonnes). Can you please clarify what is included in the 174,942 tonnes?</p> | <p>collected through the Recycle BC program on behalf of our members. Please note that the 174,942 collected tonnes provided in the annual report reflect the exclusion of tonnes collected by Recycle BC on behalf of other stewardship programs.</p> | |
| 11. | Industry Association | <p>Footnote 18 in the program plan, which was also included in the earlier draft of the updated plan, refers to the streetscape collection program. It states that the ability of a streetscape program to produce a reasonable amount of recoverable PPP is subject to proof of concept through testing effective delivery of streetscape collection systems. Could you please provide some criteria on how Recycle BC will determine if a streetscape program is considered successful or not?</p> | <p>The success of a streetscape collection program will be based on the quality of the collected material and therefore its marketability. In the current market conditions, there is no market for highly contaminated material and therefore the proof of concept is based on the current market requirements. One of the new specifications that has been introduced by end-markets, in addition to the strict limitations on contamination, is a limit on moisture content. Our streetscape pilot project showed that there is not only a high level of contamination but also a high level of liquid that is unacceptable to end markets. Footnote 18 which references the proof of concept refers to the ability to develop a streetscape collection program that can meet the current end-market requirements providing us with certainty that the collected material will be recycled and not sent to landfill.</p> | <p>Part 4, Section 4.3.10, Packaging and Paper Product Extended Producer Responsibility Plan (July 2018).</p> |



Recycle BC Program Plan Collector Consultation, July 18, 2018

| # | Sector | Question | Answer | Reflected in Revised Program Plan or other Documents |
|-----|---------------|--|---|---|
| 12. | First Nations | Is there a limit on the distance between satellite depots and principal depots? Also, is there a limit on distance between principal depots? | Recycle BC has not set a specific standard with respect to distance between principal depots and the distance between satellite depots and principal depots. However, it is important that depots not be located too closely together so that they don't cannibalize each other making some depots unfeasible due to a low volume of materials. Recycle BC looks at the size of the population that the depot will service and the location of other depots in the region and assesses feasibility based on a judgement of those factors rather than setting a specific standard for distance between depots. | Part 4, Section 4.3.8, Packaging and Paper Product Extended Producer Responsibility Plan (July 2018). |
| 13. | First Nations | Can you please provide more details on the concept of satellite depots? Would they collect the same materials as principal depots with the material then transported to the principle depot? | The operator of a satellite depot would determine which of Recycle BC's designated materials to collect. Residents would deliver those materials to the satellite depot and then the depot operator would transfer the collected material to the principal depot where it would enter Recycle BC's post-collection network. | Part 4, Section 4.3.8, Packaging and Paper Product Extended Producer Responsibility Plan (July 2018). |
| 14. | First Nations | Is there any provision in the new plan which would allow one resident to collect recyclables from other residents and deliver it to the depot on their behalf as opposed to each resident delivering the materials individually? | Recycle BC's requirement for depot service is that each resident must deliver their own recyclables to the depot. The reason for this is that it allows depot staff to speak with residents and educate them on which | Part 4, Section 4.3.8, Packaging and Paper Product Extended Producer Responsibility Plan (July 2018). |



Recycle BC Program Plan Collector Consultation, July 18, 2018

| # | Sector | Question | Answer | Reflected in Revised Program Plan or other Documents |
|-----|---|--|---|---|
| | | | materials are recyclable, where they should be placed in the depot and answer any questions they may have. We are however open to discussing other solutions for First Nations communities in light of the discussions currently taking place with Indigenous Services Canada. | |
| 15. | Environmental Non-Governmental Organization | There are packaging types currently labelled long-term storage devices such as plastic drill cases, tape dispensers, CD cases, etc. Can these items be added to the expanded list of designated materials? | Recycle BC has not yet confirmed the list of designated materials under the new program plan but will work with the BC Ministry of Environment and Climate Change Strategy in the coming months to finalize that list. We will provide detailed guidance to contracted collectors once the expanded list of designated materials is available. | Part 3, Section 3.1, Packaging and Paper Product Extended Producer Responsibility Plan (July 2018). |
| 16. | Local Government | Can you please provide information about any plans to create reduction targets for certain materials? The City of Vancouver has been working on reducing single-use items and also has a Zero Waste 2040 plan. We appreciate Recycle BC's work on developing a single-use plastic bag campaign with Retail Council of Canada and are wondering if you have plans to implement reduction targets for specific types of PPP? | We do not have plans at this time to include reduction targets in the program plan. We are however very pleased with the results of the single-use bag reduction campaign and are discussing the possibility of enhancing and repeating that program. We are also exploring other items that might be appropriate to target with that type of campaign. | N/A |
| 17. | Local Government | Does Recycle BC have plans for increased resident promotion and education efforts when a decision is made to remove a material | Recycle BC understands the need to create targeted communication when a change such as removing pet food bags from the | Part 4, Section 4.7, Packaging and Paper Product Extended Producer |



Recycle BC Program Plan Collector Consultation, July 18, 2018

| # | Sector | Question | Answer | Reflected in Revised Program Plan or other Documents |
|---|--------|---|--|--|
| | | <p>from the recycling system? For example, the recent decision to no longer accept pet food bags required an increase in consumer education to ensure residents understand this change. Can you make a commitment in the Plan to increase the P&E efforts whenever such a change is made?</p> | <p>recycling system takes place. This is very important in order to ensure the material that is collected is marketable. We use many different channels for resident communication including social media, advertising and targeted campaigns. The program plan outlines a commitment by Recycle BC to undertake research that will provide insights on specific materials that either have a lower than desired recovery rate or are a consistent contaminant in the system and to produce targeted campaigns for such materials.</p> | <p>Responsibility Plan (July 2018)</p> |



Recycle BC Program Plan ENGO Consultation, July 19, 2018

| # | Question | Answer | Reflected in Revised Program Plan or other Documents |
|----|--|--|---|
| 1. | Regarding the work Recycle BC is doing on streetscape recycling, are you familiar with an approach to behaviour change called ‘community-based social marketing’? And if so, is this the methodology Recycle BC has been for the streetscape recycling pilot projects? | The 2016-2017 streetscape pilot project included behavioural studies. Recycle BC spoke to tourists, residents and ‘binners’ throughout multiple seasonal audits. We solicited feedback on the different streetscape recycling containers. This pilot project was undertaken in partnership with the City of Vancouver and so with their assistance, we were able to conduct a thorough analysis of attitudes and behaviours in relation to the bins, allowing us to understand the effectiveness of the program. | Part 4, Section 4.3.10, Packaging and Paper Product Extended Producer Responsibility Plan (July 2018) |
| 2. | In order to drive improvement, sometimes it takes multiple pilot projects to fully understand attitudes and behaviours. Will you be undertaking more pilot projects for streetscape recycling in order to fully understand the barriers to collecting recyclables? | We have undertaken a series of streetscape recycling pilot projects beginning in 2014. At that time, we ran pilots in three different communities. In the first project we piloted a variety of collection containers in order to determine which collection bins performed best. The next step was to take the “top” containers, in terms of user feedback and quality of material collected and run a 2015 pilot in the same communities in order to identify the best bin design. This has been an iterative process over a number of years which has produced extensive insights on user behaviour around streetscape recycling and Recycle BC is committed to continuing this work. | Part 4, Section 4.3.10, Packaging and Paper Product Extended Producer Responsibility Plan (July 2018) |
| 3. | With respect to the outline in the plan to provide material category recovery rates, is there an opportunity to provide more specific recovery performance particularly for the different sub-categories of plastics? | Under the revised Program Plan, Recycle BC will begin by providing recovery rates for paper, plastic, metal and glass, as well as for rigid and flexible plastics. Based on the results of this first level of reporting, we will determine if it is appropriate to provide further | Part 5, Section 5.3.2, Packaging and Paper Product Extended Producer Responsibility Plan (July 2018) |



Recycle BC Program Plan ENGO Consultation, July 19, 2018

| # | Question | Answer | Reflected in Revised Program Plan or other Documents |
|----|--|--|---|
| | | detailed recovery rate information as the program matures. | |
| 4. | I understand that the material mix for packaging is always evolving however, from a public education standpoint, it would be helpful if there was more information available on what materials are most challenging and causing problems in the waste stream. | When Recycle BC reports recovery rates for the four material categories as well as rigid and flexible plastics we will provide examples of the types of packaging that are included in those categories in order to educate the public. | Part 5, Section 5.3.2, Packaging and Paper Product Extended Producer Responsibility Plan (July 2018) |
| 5. | It is good to see that BC is leading the way in recycling in so many ways including your work with retailers. Have you had any discussions around the collection and recycling of clothing since clothing is a significant portion of the waste stream and a lot of it is plastic? | The Recycle BC program is designed to meet the requirements of the BC Recycling Regulation, specifically Schedule 5 which designates packaging and paper product. For textiles to be included under an EPR program they would have to be designated by the Province and added to the Recycling Regulation. This is a public policy decision that would be made by the government and not by Recycle BC. | Part 3, Sections 3.1 and 3.2, Packaging and Paper Product Extended Producer Responsibility Plan (July 2018) |
| 6. | With respect to providing recycling services to First Nations communities, can you please explain how these communities are selected each year? Do they apply to be part of the Recycle BC program and is there set criteria for their eligibility? | We work with First Nations communities directly who have expressed an interest in joining Recycle BC. We are also working with Indigenous Services Canada who make recommendations on communities that they believe have recycling programs in place that would be suitable to join the Recycle BC program. Generally, these communities have some level of infrastructure in place that allows them to collect recyclables on a consistent basis. When a community is identified, we request a visit and introduce them to the Recycle BC program. We expect that now that Recycle BC has a First Nations Field Services Specialist on our staff we will be able to expand our relationship with First Nations communities. | Part 4, Section 4.3.9, Packaging and Paper Product Extended Producer Responsibility Plan (July 2018) |



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 18th 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 community¹:

- 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 19th 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.

¹ 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 MOECC 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 MOECC 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 19th 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 | Invitation sent to collectors for July 18 consultation meeting | Collectors/Local Governments/First Nations Communities | 48% | 26% |
| June 27 2018 | Invitation sent to stewards for July 17th consultation meeting | Stewards | 31% | 16% |
| June 27 2018 | Invitation sent to ENGOs for July 19th consultation meeting | ENGOs | 56% | 36% |
| July 12 2018 | Reminder e-mail regarding the July 18th consultation meeting | Collectors/Local Governments/First Nations Communities | 50% | 33% |
| July 12 2018 | Reminder e-mail to Stewards regarding the July 17th consultation meeting | Stewards | 30% | 17% |
| July 12 2018 | Reminder e-mail to ENGOs regarding the July 19th meeting | ENGOs | 60% | 20% |
| July 17 2018 | Meeting materials sent to stewards | Stewards | 32% | 14% |
| July 18 2018 | Meeting materials sent to collectors, local governments and First Nations communities | Collectors/Local Governments/First Nations Communities | 47% | 24% |
| July 19 2018 | Meeting materials sent to ENGOs | ENGOs | 45% | 8% |
| July 31 2018 | Notice that consultation meeting QAs now available | 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](#).



Appendix C: Written Submissions from Phase Two Consultations

The following are the feedback submissions received from Phase Two consultations, organized by stakeholder group.



PPEC Response to Recycle BC Plan

September 5, 2018

PPEC represents the paper packaging industry of Canada on environmental issues with members both producing packaging material and recycling it after use.

We appreciate the opportunity of commenting on the Packaging and Paper Product Extended Producer Responsibility Plan (revised July 2018) document. Our comments are listed in order.

1 (Page 4): American spelling of fibre (twice)!

5.1 (Page 19): We recognize that others use the term 100% recyclable as a goal. We would caution that recyclability is a function of being able to be recycled (i.e. having access to recycling) and that 100% will never be achieved anywhere in Canada because there are always small communities that do not have convenient access to recycling services.

5.1 (Page 20): We support the research into the quantities and types of paper being sent for composting.

5.3 (Pages 21-23): It would be useful to us to know the current (2017) specific recovery rates for various grades of paper. This would make it easier for us to encourage design changes, reduction changes, and greater recovery. But you only reveal sub-categories for plastics. Without more information on paper substrates it is impossible for us to comment on the feasibility of the targets (when they are set for all paper collectively) and whether the time lines for achieving them are reasonable.

Regards,

John Mullinder
Executive Director, PPEC



Retail Council of Canada



Conseil canadien du commerce de détail

Retail Council of Canada
Conseil canadien du commerce de détail

410-890 West Pender Street
Vancouver, B.C. V6C 1J9
Telephone +1 (604) 736-0368
www.retailcouncil.org

6 September 2018

Recycle BC
230-171 Esplanade West
North Vancouver, BC V7M 3J9

By electronic mail

Dear Recycle BC,

Thank you for the opportunity to provide comment on Recycle BC's revised Packaging and Paper Product (PPP) Extended Producer Responsibility (EPR) plan revised in July 2018.

Scope of Products Included in Plan

Recycle BC's new draft plan expands the scope of the product included in the plan.

Recommendations:

1. RCC urges Recycle BC to develop a collection and material-processing plan before any new material is obligated.
2. RCC notes that a very significant amount of the material Recycle BC proposes to obligate (including plastic straws, stir-sticks and utensils) is managed by the ICI sector's waste collection system. Other material is prevalent in the public space and therefore collection will probably be both more difficult and costlier and therefore other alternatives for managing this material may be preferable.
3. Straws, stir-sticks and utensils are currently a contaminant in the blue-box collection system. RCC's position is that there are much more appropriate and effective ways of reducing or managing this waste, including, province-wide action on single-use plastics similar to the City of Vancouver's recently-adopted single-use item reduction strategy.
4. Recycle BC may want to propose a phased-in approach to increasing the scope of products to provide obligated producers with predictability.

Recycle BC's plan proposes that retailers will report on newly-obligated materials for 2018. Recycle BC has likely underestimated the operational challenge that this will provide to retailers who are obligated stewards. It will not be feasible for some retailers to produce the information, and for others it will cause significant cost and operational impact. We recommend that:

5. If Government decides to increase the scope of materials obligated, Recycle BC should only obligate producer to report for the year beginning after plan approval and remit and report for the following year, or, again Recycle BC may want to consider a phased-in approach.

Reporting

Recycle BC's plan proposes to increase the amount of information reported on collection but is silent on the questions of: improving reporting on volumes of material Recycle BC's participants introduce into the market (by material type); reporting fees by material type; or, providing more detailed expense information to allow participants (and other stakeholders) more transparency of operational costs (including collector compensation), communications, management and board expenses.

RCC understands that Recycle BC may view some of this data as being in their commercial interest and therefore we recommend one of these alternatives:

1. reporting the associated fee revenue by material type,
2. reporting the volume of obligated material introduced into B.C. by material type, and,
3. providing the recovery rate (e.g., amount collected versus amount introduced) by material type.

We look forward to discussing these in more detail and appreciate the attention of Recycle BC and the Board.

Yours truly,



Greg Wilson
Director of Government Relations (B.C.)

September 10, 2018

Recycle BC
230-171 Esplanade West
North Vancouver, BC V7M 3J9

Via e-mail: consultation@recyclebc.ca

RE: Packaging and Paper Product Extended Producer Responsibility – Draft Revised Program Plan – Consultation Phase II

On behalf of Food & Consumer Products of Canada (FCPC), and our members across the country who are obligated and voluntary stewards of Recycle BC, we are pleased to respond to the 2018 Updated Draft of the Packaging and Paper Product Extended Producer Responsibility Plan (Program Plan).

FCPC is Canada's largest industry association representing companies that manufacture and distribute the vast majority of food, beverage and consumer goods found on grocery store shelves across the country. This industry is the largest manufacturing sector in Canada, directly employing nearly 300,000 Canadians from coast to coast, contributing nearly \$27 billion annually to the country's economy and providing safe, high quality products that are found in virtually every single home in Canada. For reference, a list of our manufacturing members is attached.

Along with being engaged stewards in recycling programs across the country, many of our member companies have already made national and international commitments to ensure all packaging is reusable, recyclable, or compostable in the near future. FCPC, along with our members, is committed to work collaboratively with Recycle BC on enhancements to the Program Plan that will build on the program's successes to date, increase recovery rates, and divert more material from landfill while ensuring financial accountability and sustainability of the program.

As we consider various environmental policy and regulatory proposals across the country, FCPC strives to ensure balanced policy and programs that will result in environmental benefit while allowing companies to invest, compete and grow in Canada. FCPC encourages the development of policy and programs that are evidence-based, provide companies with accountability and transparency of financial data as well as fiscal prudence and cost predictability.

FCPC appreciates the opportunity to provide feedback to the Recycle BC Revised Program Plan on behalf of our members. While we can offer our general support, we hope the specific and significant concerns we have raised regarding the proposed expansion of obligated materials will be taken consideration as the plan moves forward. Given the importance and complexity of the program, and particularly in light of the closure of international markets to recyclable materials, FCPC strongly encourages Recycle BC to have continued and ongoing dialogue and discussions with stewards and their trade associations regarding the Program Plan update.

Please do not hesitate to contact me with any questions of clarification or concerns. We trust you will consider FCPC a resource.

Sincerely,



Michelle Saunders
VP Provincial Affairs & Sustainability



Introduction

FCPC supports the regular review of Recycle BC's Program Plan to ensure continued improvement and effectiveness. The Program Plan update is critical as it not only incorporates 2017 changes to Schedule 5 of the BC Recycling Regulation, but also recognizes and responds to several external contextual considerations such as the G7 Oceans Plastics Charter, the closure of the Chinese market to the majority of recyclable materials, national and international discussions on producer responsibility and packaging innovation. It follows that in order to recover more material and divert more waste from landfill the BC program must be expanded, however we note below a number of specific comments, concerns and questions of clarification.

3.1 Packaging

The draft Program Plan proposes a broadened scope of obligated materials, to include both packaging-like products and single use plastic items. We note with interest and concern that neither of these product categories were included in Phase I of the consultation process, and suggest neither fits the criteria set out in either the *Environment Management Act* or the Recycling Regulation.

FCPC recommends that before any new materials are included in the Program Plan comprehensive analysis is conducted to determine environmental and economic opportunities, including the viability of existing or potential end-markets, infrastructure capacity, both existing and forecasted, costs and benefits, including cost efficiency and program effectiveness, the experience of other jurisdictions, both in Canada and abroad, and harmonization with existing national and international efforts.

We, along with our members, have a number of questions and concerns regarding the proposal to include packaging-like products and single-use products, and recommend Recycle BC continue dialogue with stewards before proceeding with expanding the scope of obligated materials.

Of significant concern, the list of items which could possibly be included in packaging-like products and single-use products (i.e. *aluminum pie plates, aluminum foil, plastic or paper-based beverage cups, kraft paper bags, re-sealable plastic bags, plastic cutlery, plates, cups, straws and stirrers*) is vague and, as the consultation document acknowledges, incomplete. Although it is proposed that Recycle BC would develop guidance on this matter upon approval of the Program Plan, we suggest this clarification is required in advance, so stewards are aware of their obligations and can, in collaboration with Recycle BC, be able to reasonably determine cost implications.

FCPC recommends targeted consultation and guidance to specify how "packaging-like" products and "single-use" materials will be defined as distinct product categories, including specific criteria for obligated materials included in the program that ensure a fair distribution of costs and obligations for all producers. FCPC also recommends that Recycle BC consult with other jurisdictions in Canada that are already considering some of these products using different terms and definitions, and ensure as much harmonization of terms as possible. These discussions are critical to producers' ability to consult on the revised Program Plan, and we recommend they take place prior to government approval.



FCPC has significant concerns specifically with the proposal to include re-sealable bag within the definition of packaging-like product. We disagree with this categorization. Re-sealable bags, like other more durable storage containers, are regularly used repeatedly and for long periods of time.

We are further concerned that re-sealable bags, which are also often used for food storage pose a risk of contaminating and degrading the quality and value of recyclables.

With regard to single-use items, the draft Program Plan proposes that straws, spoons and other items be included in this new category. It is unclear how items such as straws and spoons sold or distributed separately will be distinguished as single-use items from similar items that are sold as part of another product (ie: straw attached to a drinking box, or spoon attached to a yogurt/pudding/fruit cup, etc.). These latter products are already captured under the Program Plan obligations for “packaging components and ancillary elements”. FCPC requests more dialogue and guidance on how this rule may be applied, and how these types of products would need to be reported and assessed for fee allocation.

Stewards have also noted some municipal efforts to reduce or restrict specific items, through product bans, which are not only impractical for manufacturers who make a single product for the national marketplace, but are actually counter to Recycle BC’s efforts. We encourage Recycle BC to consider ways of working with provincial and municipal governments to ensure aligned efforts that achieve both environmental benefit and a fair regulatory climate for businesses.

Steward Reporting

The July 17 steward consultation webinar stated that, for newly obligated materials, stewards would be required to report in 2019, using 2018 data, and that those reports would be used to set 2020 fees. Stewards will struggle to report in 2019 on data they may not have been collecting in 2018. Further, it is premature to assume that the data reported will justify those materials being included in the obligated materials list until a full analysis is complete.

Notwithstanding our earlier concerns that packaging-like products and single-use products should not be listed as obligated materials at this time, FCPC recommends that no new material reports be required until 2020, using 2019 data so stewards know what records to keep, and no new fees be attributed until a full analysis has been undertaken to determine which materials are listed as obligated materials.

FCPC would encourage Recycle BC to ensure that data collected from producers is used to conduct an assessment of the efficacy and viability of including “packaging-like” and “single-use” products in the program, before it is immediately used to set fees. Data should not be collected under the presumption that it will only be used to set fees, without any proper analysis. The Recycle BC program has been successful in weathering market changes including China’s National Sword, because of its prudence and evidence-based decision-making, only collecting those materials for which there are viable end markets.

Pilot Projects

FCPC is encouraged by Recycle BC’s pilot project for collecting flexible plastic packaging, and along with our members, are eager to see the results of the program. Finding innovative ways to make collection and management of materials financially viable is vital to ensuring that the Program continues to be sustainable. We hope that the results of this pilot are made available to

stewards, and that they, as well as steward reporting are taken into consideration before adding the new products to the Program Plan.

3.2 Paper Product

As the approved Program Plan will align with 2017 changes to Schedule 5 of the Recycling Regulation, FCPC is fully in agreement with the acknowledgement that obligated paper products “does not include paper products that, by virtue of their anticipated use, could become unsafe or unsanitary to recycle”.

4.1 Packaging and Paper Product Program Delivery Principles

FCPC supports Recycle BC’s overarching objective to continuously improve the effectiveness and efficiency of recovery in British Columbia. We also support the continued use of the program’s founding guiding principles;

- *“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.”*

FCPC agrees that Recycle BC should always strive to deliver a program that is harmonized and straight forward, to provide as much clarity as possible to stewards. Especially given many stewards operate in many jurisdictions across Canada and internationally. However, FCPC would suggest “**environmental benefit**” be included explicitly in the guiding principles. Maximized recovery is not necessarily synonymous with optimal environmental outcomes and Recycle BC should strive to constantly evaluate how its program contributes to environmental management overall.

4.3 Streetscape Collection

Recycle BC has taken numerous steps to evaluate and consider streetscape collection, but the challenges noted, including the closure of China’s commodity markets, and significantly high contamination rates suggest further consideration be given to a fair, effective, and efficient streetscape collection model before any further decisions are made. Further research and consideration must be given to collection capacity, infrastructure, consumer behaviour and processing capacity before proceeding further.

4.7 Communication

At the end of the day, resident and consumer participation is the keystone of all recycling and waste diversion programs. A perfectly designed system cannot function without active and informed participation by consumers. That is why FCPC is supportive of Recycle BC's objective to, *"Engage and encourage residents to make informed and proper decisions concerning the preparation and management of PPP for collection and recycling by employment of general and targeted promotion and education (P&E) activities."*

Resident and consumer awareness and education, informed by consumer research, is fundamental to ensuring that collection and recycling services proceed effectively, volume of valuable materials is high, and contamination rates decline. By engaging with producers and other governments and organizations, Recycle BC can ensure that residents receive clear, consistent messaging and information on how to participate in the program. This education process is simplified when jurisdictions have harmonized systems and language that can be clearly understood to minimize confusion among residents and stewards.

4.9 Program Financing

FCPC is supportive of the program financing elements outlined in the draft Program Plan, and we are encouraged by the work Recycle BC is doing to expand and improve the collection and management of materials. The flexible plastic packaging pilot, is reassuring to producers who pay fees and want to see their packaging responsibly managed. FCPC supports the prudent decision to not collect materials without viable end markets, but also supports investment and research in emerging technologies to develop those markets.

FCPC would however, like to raise concerns held by stewards about bearing the ever increasing costs of materials entering the system from producers not paying into the system. Given the growing trend among consumers to purchase goods from online retailers, these bodies need to be fully captured as obligated producers. Given the fees stewards pay for uncollected material, stewards need to be sure that all producers who generate packaging that enters BC programs are paying their share. A concerted and explicit effort should be made to ensure producers active in e-commerce (ie: Amazon, Canada Post, etc.) are captured in the allocation of management cost, to ensure a level playing-field, and to eliminate any free-riders from dumping orphan materials into the program.

FCPC would also like to suggest the consideration of the role financial incentives could play in developing the circular economy for recyclable materials. For example, Recycle BC could encourage the government to incentivize the use of recycled materials in packaging. This would serve to reward stewards for the work they have done toward including or increasing recycled content, and generate more interest in developing the demand for recycled plastic. It is worth noting however that FCPC has recommended clarification and guidance from Health Canada on the safe use of recycled content specifically for food content packaging.

5.1 Managing Environmental Impacts

The new Program Plan is not a starting point, but builds on successes and ongoing efforts of Recycle BC and stewards. FCPC supports the acknowledgement of the work producers continue to do to reduce the environmental impact of the packaging and paper product they distribute. Many FCPC member companies have made national and international commitments



to make all their packaging or products recyclable or compostable, and to use recycled material in their packaging. Many producers employ life-cycle-analysis for their products and packaging, to minimize their environmental impact, and reduce greenhouse gas emissions, resource use, and waste generation, at every stage of a product's life. Our members are actively engaged in international partnerships to foster collaboration and innovation. The New Plastics Economy is one such industry lead initiative to develop a true circular economy for plastics to prevent them from entering our environment.

Compostable Packaging and Paper Products

FCPC is very interested in Recycle BC's research into compostable packaging and paper products, an ever increasing area of development as companies look to alternative materials to reduce environmental impact.

"With the expansion of packaging and paper 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)."

Innovations in compostable materials, particularly in packaging, represent a new and emerging issue for organics policies and program management that is distinct from other diversion issues but that also offers opportunities for progress toward climate change goals. The inclusion of this type of diversion in the pollution prevention hierarchy is entirely appropriate, and should be considered when examining product and material recovery rates.

The acceptance of certified compostable products into municipal organics programs is currently a patchwork across Canada. Companies who have invested in research and innovation, and whose products have been certified compostable find themselves in a situation where some municipalities readily accept the product and others are unwilling to. This prohibits effective and consistent consumer education and simply causes confusion, resulting in waste.

FCPC strongly believes that terms and standards for this growing market should be guided at the federal or national level to ensure harmonization. FCPC has recommended that Environment & Climate Change Canada or the Canadian Council of Ministers of the Environment consider a single definition or standard for compostability to prevent a patchwork system on compostable packaging and materials from proliferating. The ASTM International Standards includes examples, including the ASTM D6400, of generally accepted standards for compostable materials.

FCPC supports financial incentives to encourage the continuous innovation, and management of appropriate packaging and paper products through the organic waste stream, and recommends Recycle BC engage stewards in discussions on this matter.

5.3 Performance Metrics

FCPC believes the targets set by the program plan are reasonable, and effectively categorized to encompass the materials in the program (i.e. plastic, paper, glass, and metal). While we are satisfied by the plan, we would like to reiterate that targets should be evidence-based, taking into account current recovery rates, available volume and technological capacity, and overall financial sustainability of the program.

FCPC

Food & Consumer
Products of Canada

PACC

Produits alimentaires et de
consommation du Canada



FCPC Members



As of May 2018



Recycle BC
230-171 Esplanade West
North Vancouver, BC
V7M 3J9

Attention: Ms. Tamara Burns – Vice President

RE: *Response to Consultation on Revised Recycle BC Program Plan – Phase II*

Response Address: consultation@recyclebc.ca

Dear Ms. Burns

The Canadian Plastics Industry Association (CPIA) is pleased to provide the following comments and recommendations to the Phase II Consultation.

The proposed plan has identified some key improvements that CPIA believes should be implemented as soon as possible:

- **Expanding the scope of obligated packaging**
 - o Include packaging-like products and associated plastic items such as re-sealable plastic bags, plastic cutlery, plates, cups, straws and stirrers. This would not only expand the list of accepted packaging but also move these products from being landfilled waste resources to being part of the valued recycled materials stream of a circular economy.

- **Providing the opportunity to collect PPP in-store**
 - o For more than 20 years, highly dedicated and motivated BC consumers have been returning the multi-purpose recyclable plastic shopping bags to their retailer's supplied collection containers. Pre-Recycle BC analysis, based on industry and recycler's supplied numbers, calculated the plastic bag recycling rate (for all bags distributed) at > 30%. To many this recycling rate would seem unsatisfactorily low, but when coupled with a > 60% bag reuse rate (supported by waste audits), these bags are also no longer available for recycling as they are a proven substitute for heavier plastic kitchen catchers used for household waste and other types of reuse. Also supported by waste composition studies, the audits found less than 10% of all bags were "wasted" (i.e. not recycled or reused). To state this another way, 90% of all bags are

reused and recycled which is an outstanding environmental performance when compared to other materials and packaging.

- This same high-performance bag system is still functioning today and has actually expanded access over the years more recently with the addition of Walmart and London Drugs programs. This bag recycling has not been fully accounted for by Recycle BC reporting systems. Thus, there should be no surprise that Recycle BC (MMBC) has repeatedly stated that while there are no actual numbers available, their best estimates inaccurately put the plastic shopping bag return rate through the PPP system at less than 10%. Being able to bring the full benefits and potential of the whole bag return system with its dedicated consumers fully into the PPP system, will provide an immediate uptick in system return volumes. This will also provide greater interaction with the consumer as demonstrated by the current London Drugs program. The potential also includes the opportunity for better knowledge and understanding of the circular economy process by the consumer, increased materials returns, more environmentally sound buying decisions and how 3R's choices by consumers (and retailers) lead to higher levels of support and satisfaction for these programs.

- **Managing the Challenges of Streetscape and Public Spaces Collection and Recycling**

- There is no question that this is a challenging and frustrating segment of the Recycling BC obligations. There is also no question that Recycle BC has put considerable time, effort and financial resources into studying and testing potential methods of managing the segment – with apparently little or no success to date. The work done has led Recycle BC to clearly state that while there are valuable components in this stream the mix does not meet Recycle BC's criteria for recycling. Further, that while there are new technologies coming on stream that have the potential to make use of some or all these materials even those opportunities may not meet the Recycle BC requirements as set out in the plan. So, as it stands right now these materials are being researched and reviewed and going to disposal. The reality is that abandoning these materials until something happens that will make this segment meet the commodities grade standards of residentially generated feedstocks is probably a long-term scenario with all the ongoing public outcry, political angst and unnecessary punitive ban bylaws on fully recyclable materials in these public space bins.

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

Section 5.2 of the plan clearly states that “The Program Plan adheres to the pollution prevention hierarchy” and sets out the

chart of hierarchy. Disposal is the very last step in the process and only used after materials have been taken out at the highest value possible.

The current process for streetscape and public spaces materials is not consistent with the plan and stated hierarchy. At the very least, as an interim landfill diversion solution, materials generated and collected close to the Burnaby Energy from Waste facility should be used as fuel for the generation of electrical power for the circular economy. This may not meet the ideals wished for but it is a realistic and reasonable interim solution for most of the public space material generated in Metro Vancouver currently unsuitable for recycling. This can be quickly implemented and when the quality of streetscape collected materials improves it is easy to move the materials to higher levels of use in the solid waste hierarchy.

- **Communications**

- Based on CPIA experience over the past year or so with municipalities, there seems to be a great deal of confusion and general lack of knowledge about the BC stewardship system. This is not only at the resident level but also with many elected officials and policy makers. This is not exclusively a Recycle BC challenge but there should be a greater emphasis in the plan to go beyond the nuts and bolts of where to put obligated materials. There is a need for more information about the system, what does it do – how does it work – who pays the bills and is responsible for managing the system. This is likely to be a particularly challenging year as a local government election year with what is forecasted to be a significant number of newly elected politicians to local governments. Communications of industry's role in stewardship for the province is critical to avert further municipal intervention in banning or putting punitive measures on industry and its programs, especially when stewards are 100% financially and operationally responsible. We see the actions of some municipalities as a threat to industry stewardship, the circular economy, while stifling innovation, investment in new technology, employment and systems that will get us closer to zero waste to landfill. We are suggesting greater collaboration between industry/Recycle BC, the Province and municipalities to address this issue and strengthen the one of Canada's leading stewardship programs.

- **Reporting Program Results**

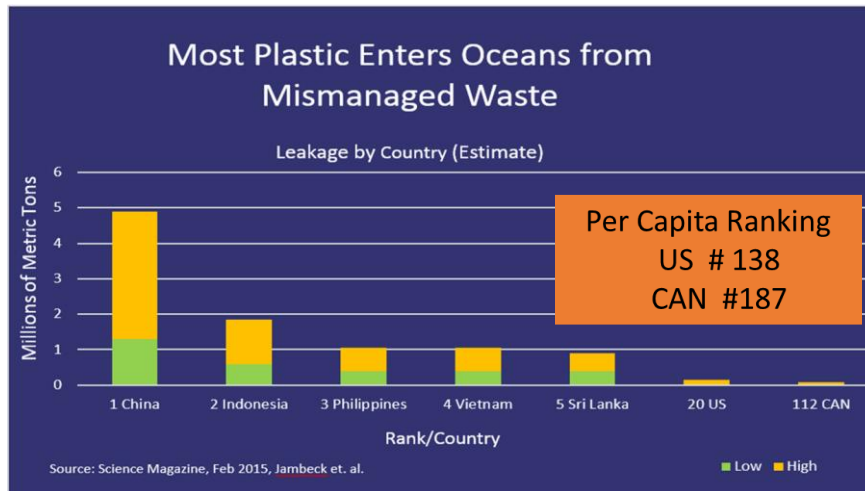
- From CPIA's perspective this is one of the areas of most concern. The aggregation of plastics into two large groupings – Rigid and Flexible - does not provide enough information to clearly demonstrate the performance of the program in collecting and recycling these materials. This lack of detail leaves the system and the industry open to criticisms with no means of definitively stating what is actually happening, identifying issues, solutions and investment required that lead to continuous improvement

- The continuing challenge is not being able to get the robust data to actually determine what has been accomplished and how we can continually improve the system. The Recycle BC system is physically handling the materials, has the means, opportunity and the obligation to provide accurate and detailed breakdowns of what materials are passing through the system. This data should be available to all stakeholders and public.
 - Overall, greater transparency and collaboration between industry, municipalities and the province is essential to the future ongoing success of this very public BC stewardship system. This will facilitate and allow key stakeholders to participate by bringing their resources and expertise to ensure the system continuously improves.
- **Communications – Multi-Purpose Recyclable Plastic Shopping Bags**
- CPIA would like to address Recycle BC’s communications approach to promoting plastic bag reduction. We are highly disappointed that Recycle BC would “demonize” and sacrifice a well stewarded product that has been found through Life Cycle Assessment (LCA) by various governments (Quebec, Denmark & United Kingdom) to be the best environmental choice among all carry bags because of an operational markets problem that could have been addressed through effective and positive communications to the public. It must be noted this is a complex issue. Recycle BC’s negative communication approach demonstrates it has not done its research on the negative unintended impacts of the communications program on the environment, which is the generation of more solid waste/more plastic through kitchen catchers purchased to replace the shopping bag, more GHG’s & climate changing emissions and unrecyclable single purpose reusable bags that will end up in landfill. CPIA despite its discussions with senior management to be consulted and involved was ignored along with our concerns for the unintended negative environmental impacts that will occur. CPIA could have provided the information and expertise to assist Recycle BC to make a truly better environmental and operational decision while maintaining a positive message that would better inform the public on how they can best support the program. Positive messaging to the public on recycling in our experience since the birth of the Blue Box always works best to solve recycling issues.
 - Our plastic industry position on bags is to reduce, reuse and recycle. Reduce by only taking bags that you need; reuse plastic bags for all they are worth or use reusable bags and lastly make sure plastic bags are recycled at their end of life. The value chain from plastics to retailers and the consumer are highly aligned on this hierarchy over years of education programs at point of sale and through industry programs.
 - CPIA requests the bag campaign messaging be reassessed as it is damaging to the environment (negative unintended impacts) and is an affront to industry that has worked diligently to implement effective

3R's bag steward programs in BC and across Canada to truly protect the environment, economy while meeting and addressing consumer needs and behaviours. CPIA requests a meeting with Recycle BC to present the science and facts and discuss how more positive communications and new sort technologies can improve operations at the MRF and marketing of all recyclables.

- **Comments to Program Context (page 4)**

- We are pleased and support Recycle BC's attention to the G7 Ocean Plastics Charter. The CPIA and its members have made shared societal sustainability goals to the following:
 - 100% of plastics packaging is re-used, recycled and recovered by 2040
 - Interim Goal: 100% of plastics packaging is recyclable or recoverable by 2030
- The mention of the Chinese commodity import ban for paper and plastics and Recycle BC's ability to weather the storm demonstrates the value of strong EPR programs that have developed local markets that have the capacity, technology and markets to incorporate plastics in our own emerging circular economy. Based on the G7 goal of 100% of plastics packaging is re-used, recycled and recovered by 2040, it is recommended Recycle BC commit additional research resources to addressing more non-recyclable plastics (which already have a very small carbon footprint & low global warming potential compared to other materials) with the new 21st Century Advanced Plastic Recycling technologies that are now being commercialized and being developed in the marketplace. These technologies will fill the gap that conventional plastic recycling cannot address and lead to achieving the fulfillment of the G7 100% goal.
- By managing 100% of plastic packaging through conventional and advanced recycling technologies, design and education (i.e. littering behaviour must be addressed), BC will ensure plastics resources are circulated in the economy, their full value and benefits realized and the issue of land and marine plastics fully addressed. We must note the program context should inform readers that Canada and G7 countries are not major contributors of marine plastics because of our sophisticated waste management and EPR programs that manage plastic waste resources and other solid waste effectively. In fact, Canada's contribution to mismanaged plastics entering marine environments is so low, on a per capita basis is 187 out 195 countries.



ABOUT THE CANADIAN PLASTICS INDUSTRY ASSOCIATION

CPIA is a non-profit national plastics industry association representing Canada’s plastics industry value chain from resin producers to brand owners using plastics. With over 2,600 companies employing 82,000 workers, Canada’s \$24.3 billion plastics industry is a sophisticated, multi-faceted sector encompassing plastic products manufacturing, machinery, moulds, and resins. <https://www.plastics.ca/AboutCPIA>

Plastics manufacturing and use of plastics in a range of sectors make significant economic, social and environmental contributions in Canada and B.C. Benefits of using plastics include product light weighting, increased hygiene and cleanliness, decreased spoilage and food waste, durability, convenience and safety, among others. These benefits are realized in the many industries where plastics products are commonly used, such as packaging, construction/building development, automotive, aerospace, electronic equipment, and healthcare.

We look forward to the ongoing opportunity to work with Recycle BC and sharing our experience and knowledge of plastics recycling and recovery to achieve the challenging G7 domestic targets.

Sincerely,

Joseph P. Hruska

V.P. Sustainability

Craig Foster

BC Sustainability Consultant

Copy: Teresa Conner, BC Ministry of Environment

Teresa.Conner@gov.bc.ca

September 09, 2018

RecycleBC
230-171 Esplanade West
North Vancouver, BC V7M 3J9
Sent by email to: consultation@recyclebc.ca

Re: Canadian Federation of Independent Business response to the Consultation on Phase II

Dear Consultation Committee:

CFIB is a non-profit, non-partisan business association with 110,000 members across Canada, including 10,000 in British Columbia. We are the largest organization in the country exclusively representing the interests of small and medium-sized enterprises (SMEs) to all levels of government. Today we write to express significant concern about the proposed expansion of Recycle BC's mandate

Multi-Materials BC (MMBC)

CFIB and many of its members have had a long and, at times, challenging history with Multi Materials BC (now Recycle BC). The initial roll out of the program caught most small business owners by surprise, was overly complicated to administer, and was full of unhelpful jargon. At that point, businesses became responsible for the paperwork and costs related to curbside recycling. Even worse, to comply business owners were responsible for calculating the amount of packaging and printed paper they distributed to consumers, and then the rate they would have to pay on said materials. In short, it was a red tape nightmare and a brand new operating cost for many business owners.

Despite the fact that thousands of small businesses were going to help pay and run the program, no one bothered to consult with small business owners before the "extended producer responsibility" legislation was passed in 2011. In fact, the program was designed by and for big businesses, not small. For example, none of the material produced to assist business understand and comply with their new responsibilities were geared towards small business. The materials were lengthy, complicated, and not developed with a typical business owner in mind. To illustrate this point, MMBC's "*A Guide to Help Businesses Meet Their Recycling Obligations in British Columbia*" was 93 pages, while the Membership Agreement was 14 pages. This is not the correct way to get buy-in from the small business community, who do not have the time to read through tomes of information to understand their obligations. In addition, there were no exemptions for

small business owners, whose realities are much different than large producers of recyclable materials.

All of this culminated in CFIB awarding MMBC our national **Paperweight Award** in 2014, for "making life even harder for small businesses through excessive rules and red tape."

Some positive changes at RecycleBC was the implementation of the small business exemptions and the introduction of the flat fee, both were appreciated by our members.

However, fast forward to today and it feels like the same mistakes are being made all over again. Despite the long list of problems with the introduction of the program, the proposed expansion is replicating them.

It is deeply disappointing that CFIB was not contacted to be part of this very short consultation period to provide the unique perspective of the small business community. In fact, since MMBC (now RecycleBC) was created we have not received any communication from the program to help inform our members. After the negative media attention the program received for its epically poor initial roll-out, CFIB hoped best practices for any future consultation would be put in place. Unfortunately, it was only through communication with other organizations that CFIB found out about these significant proposed program changes which could have a big impact on many small business owners.

Like most British Columbians, business owners care about the environment and support initiatives that help protect it. A strong majority (77 per cent) believe it is possible to simultaneously grow the economy and protect the environment (see Figure 1). Ensuring BC residents and businesses have input to help find the right balance is crucial. It is equally important to estimate the economic cost of any programs.

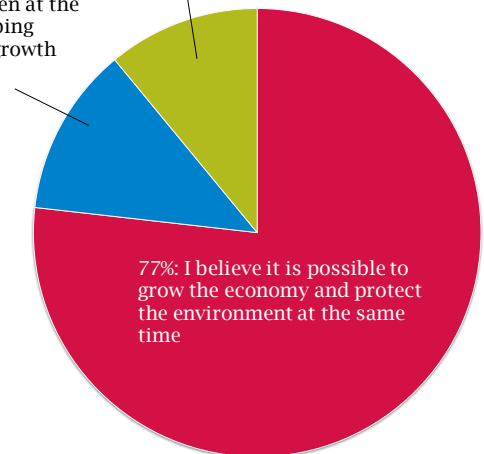
It is imperative that government, and by association any organization they have given the power to act on their behalf, must ensure proper analysis is conducted and publicly released before any significant policy changes occur.

Figure 1

Which of the following statements best describes your own point of view about the environment and the economy?

11%: Economic growth should be given priority, even if the environment suffers to some extent

12%: Protection of the environment should be given priority, even at the risk of curbing economic growth



Source: BC Environmental Consultation survey, March 2016, n=482

CFIB finds it baffling that the Ministry of Environment and Recycle BC are moving to expand the agency's current mandate with little advance notice and consultation. It is especially disappointing as the current government, while sitting in opposition, agreed with many of the issues CFIB originally identified with MMBC.

Then opposition spokesperson for the Environment and now Minister of Agriculture, Lana Popham, went as far as to ask for the Auditor General to review the initiative. The petition for the review can still be found online at: www.tinyurl.com/auditmmbc.

Furthermore, CFIB asked all party leaders during the last election if they would review MMBC and the [NDP committed to a full review of RecycleBC](#). Their responses to our election questionnaire on the issue was as follow:
 Q: "Multi-Materials BC has had a negative impact on many businesses in BC. Will you commit to an independent review of MMBC and the former program through a lens of the economy, the environment, and competitiveness?"

A: Yes, we will do an independent review of MMBC. BC NDP MLA Lana Popham has been a major critic of MMBC and the Recycling Regulation that created it. She called it a "Godzilla-sized red tape monster" and asked the B.C. Auditor General to audit the organization, only to find out that the B.C. Liberals had set it up to be immune to government audit. We'll change that. We will launch an independent review to make sure it's working for B.C. businesses and consumers, and to ensure that it's transparent, accountable, and cost effective.



Lana Popham

November 25, 2014 · 🌐

Today I launched an online petition calling for the Auditor General to review Multi Material BC. I'm taking this action because I believe the BC government has botched its overhaul of the recycling sector in BC. BC recycling businesses are worried about their livelihoods, Syntal on Vancouver Island has been forced to shut down, cities like Richmond are crying foul, BC businesses want accountability, the agriculture sector and others are being hit with excessive fees, and consumers will most likely be paying more, while in many cases recycling less.

The BC government has created a scheme that empowers MMBC to use regulatory powers to demand fees from businesses but allows it to avoid public accountability for how those funds are used.

MMBC is empowered by the Ministry of Environment to compel businesses to pay 100 million dollars annually but it is not accountable for how those funds are spent under the 'Budget Transparency and Accountability Act', or the 'Financial Administration Act'.

I'm a strong proponent of recycling, I have been all my life, and that is why I'm so concerned about what they are doing to the sector. MMBC is not using a life-cycle analysis of recyclables. It is not addressing the environmental concerns which underpin the demand for recycling in the first place.

That is why I am asking people to join me in requesting the BC government to direct the Auditor General to initiate a full review of MMBC.

The petition is at: <http://tinyurl.com/auditmmbc>.

Thank-you for your attention and please feel free to share.

Based on these facts, it is CFIB's opinion that Recycle BC, despite its rebranding, should not be granted additional responsibilities until this independent review has been conducted.

Expansion of Recycle BC's mandate

Undertaking the proposed change to include more items in Recycle BC's mandate is premature. This expansion of scope comes only months after the Government expanded the scope (without prior consultation) of paper products in fall 2017 and is being proposed through a plan amendment rather than regulatory change by government. In addition, without direction from and harmonization with the federal government that has indicated they will be undertaking **similar** measures, this initiative is premature and will put BC businesses at a competitive disadvantage. If

any changes are made, they should be done with federal cooperation to ensure BC business owners do not need to follow multiple sets of rules.

From the consultation paper, it does not seem that Recycle BC is ready to begin implementing an expanded program, such as broadening the scope of obligated material to include:

- ▶ aluminum pie plates,
- ▶ aluminum foil,
- ▶ plastic or paper-based beverage cups,
- ▶ kraft paper bags,
- ▶ re-sealable plastic bags, or

Single-use plastic items such as:

- ▶ plastic cutlery,
- ▶ plates,
- ▶ straws, and
- ▶ stir sticks.

It is noted in the proposed plan that the reference to “packaging-like product” and “single-use plastic items” above provides examples of obligated products and is meant to be illustrative. Upon approval, Recycle BC has said it will provide stewards and service providers with guidance on the scope of this category. **This needs to be much more concretely spelled out in advance of any changes. Producers of materials need time to adopt, and it is unclear what precisely will be included at this time.**

There is a strong concern from CFIB’s view that with an expansion of scope, small business owners will have a sudden and unexpected cost increase. This will be particularly challenging in the current policy framework, where their costs are going up from the minimum wage increase, a new employers’ health tax, carbon tax increases, CPP increases, soaring property taxes and host of other new costs being foisted on them. In fact, it is alarming that nowhere in the consultation document are fees discussed.

CFIB notes that Recycle BC has a significant annual operating surplus (\$11,651,715 in 2017) and is sitting on a large amount of net assets (\$63,291,251 in 2017). If the proposed changes do in fact occur, there will likely be strong resistance towards increasing fees. Rather, Recycle BC should use its current financial position to accommodate cost increases, and find efficiencies to reduce the need to hike fees.

At this time, it is CFIB's assessment this consultation does not suffice as adequate discussion on broadening producer responsibility to include new items, and this expansion be placed on hold until proper consultation and clearer information on the cost of the program to producers is provided.

RecycleBC: Sufficient efficiency?

Analysis of Recycle BC's annual data from 2014 to 2017 shows the organization does not, in fact, appear to be operating efficiently. This is one of the many reasons why CFIB believes the current consultation is not adequate, and a full review of the organization should be conducted. In conjunction to this letter, you will also find a research snapshot supporting the following arguments.

Despite the fact the organization has grown in terms of revenues, households served, and tonnes of product collected since 2014, the recovery rate has actually decreased. Sitting at 80% for 2014, the recovery rate has since declined to 75% as of 2017.

To increase the program's recovery rate beyond the current 75% will require RecycleBC 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. This is why CFIB strongly believes a longer-term consultation is necessary, with greater involvement from *all* stakeholders. This is especially important with consideration to RecycleBC's recent questionable use of resources.

In 2017, the organization spent \$1,824,395 on advertising costs. Most worrying, despite spending a large amount of money on promotional and educational materials, there were only 2,097 new households participating in the program that year. This means the customer acquisition cost for 2017 was \$824 per person.

It is simply unsustainable and unaffordable for Recycle BC to continue spending significant monies on advertising while seeing little results. This is especially true when considering that the monies being spent are at a significant cost to employers. **CFIB strongly believes an independent review of Recycle BC must be conducted, or at minimum, the current consultation be expanded.**

Final Comments

Thank you for taking the time to consider the views of small business owners in British Columbia on the issue of Recycle BC. CFIB understand the importance of establishing a provincial recycling program that benefits society as a whole; to achieve this goal, CFIB believes there is still much work to be done. With that in mind we recommend the following:

1. An independent review of Recycle BC as promised by the government must take place before any expansion is allowed
2. Proper consultation with a full detailed plan is a must before moving forward

3. A standard definition of compostable packaging must be clearly defined to allow producers to adapt and to streamline standards
4. Direction should come from government and not as an amendment to the plan to ensure that the interest of all taxpayers is considered and not just the interest of Recycle BC
5. If changes are made, consultation should be had with small business to the impact and at what levels the exemptions should apply.

CFIB still feels it is unfortunate that Recycle BC is not accountable to any government agency, appointed official, elected official (provincial or municipal) or any other government body. Moneys collected are not part of public accounts, nor are they subject to oversight by the Auditor General of BC.

In addition; Recycle BC is able to function on behalf of taxpayers, in this case business owners, without the ability to access information through the Freedom of Information Act. This means we are completely dependent on whatever information RecycleBC choose to disclose through their annual reports.

We would welcome a meeting to further discuss our position and allow an opportunity for Recycle BC to provide more detailed information that we can share with our membership. Please do not hesitate to reach out with any further questions or comments.

Sincerely,



Richard Truscott
Vice-President, British Columbia and Alberta



Samantha Howard
Director, British Columbia, Yukon and NWT

CC: Honourable John Horgan, Premier of BC
CC: Honourable Bruce Ralston, Minister of Jobs, Trade and Technology
CC: Honourable George Heyman, Minister of Environment and Climate Change
CC: Honourable Lana Popham, Minister of Agriculture

Thursday, September 6th 2018

Recycle BC
230-171 Esplanade West
North Vancouver, BC V7M 3J9

Sent Via email to CONSULTATION@RECYCLEBC.CA

To Whom It May Concern:

Thank you for the opportunity to submit comments on Recycle BC's updated Packaging and Paper Product Extended Producer Responsibility Plan, release this past July.

Generally speaking, CCC supports the updated proposed plan, with one notable exception pertaining to program performance reporting.

As you know, the mission of the Carton Council of Canada is to deliver long-term collaborative solutions with multiple stakeholders in the value-chain in order to divert cartons from disposal. In order to measure our progress, we rely on the publicly available information provided by the deposit and multi-material stewardship agencies in each Canadian jurisdiction. In the case of British Columbia, we had hoped to see a notable increase in the recovery of dairy and dairy substitute cartons in particular, which were previously collected under the voluntary program run by the Dairy Council of BC and achieving a recovery rate of about 16%.

We put forward our request for material-specific recovery rate information at Recycle BC's one-year anniversary mark, and conveyed it via our participation in Recycle BC's two-day consultation held in November, 2017. It is also captured in the Consultation Report published February 28th 2018¹, and in comments we submitted on the initial plan (Phase 1 consultation), released in March, 2018.

RecycleBC's lack of transparency on material-specific recovery rates is difficult to understand, given that: i) other stewardship agencies across the country (Stewardship Ontario, MMSM, and EEQ) make this information public; ii) Recycle BC relies on this information to set material-specific fee rates via

¹ As indicated on p. 7 of the report, under the heading Packaging Design & Recovery Rates: "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". This statement received several votes of agreement at the consultation session and it was identified as a repeated comment and/or submission.

Follow us on [LinkedIn](#) for news and information about carton recycling and our activities.

the Pay-In-Model; and iii) Recycle BC now has five years of operational experience in hand, and should therefore be in a position to effectively track this metric.

In addition to the material-specific recovery rates, the quantity of each material category supplied by producers into BC should be made available.

Recycle BC's announcement that, under the revised Program Plan, it will begin by providing recovery rates for paper, plastic, metal, glass, rigid and flexible plastics, is a step in the right direction.

However, it is not sufficient to enable vested stakeholders such as ourselves, to understand their current diversion performance and to work towards continuous improvement. To this effect, we strongly encourage Recycle BC to begin publishing the information it uses to set fees.

In closing, CCC commends Recycle BC for the quality of the consultation process that it has led to date, and we look forward to continuing the work to advance the important issue of transparency and data accessibility.

Regards,



Isabelle Faucher
Managing Director,
Carton Council of Canada

September 5, 2018

Recycle BC
230-171 Esplanade West
North Vancouver, BC V7M 3J9

Via email: consultation@recyclebc.ca

Dear Sir/Madam,

Re: Recycle BC Consultation on Revised Program Plan – Phase II and the Proposed Packaging and Paper Product Extended Producer Responsibility Plan

Premier Tech Home & Garden (PTHG) is the leading Canadian manufacturer of lawn and garden products and a steward in post-consumer paper/package and household hazardous waste programs across Canada. PTHG is pleased to provide comments on the Recycle BC Consultation on Revised Program Plan – Phase II and the proposed Packaging and Paper Product Extended Producer Responsibility Plan

Packaging and Paper Product Program Delivery Principles and Focus

PTHG supports the four delivery principles as outlined in both the current and the proposed amended program. However, we believe the importance of economic considerations in the program's efficiency should be acknowledged in the principles as well. Over time, developing incremental program performance improvements and measurable environmental benefit may become economically challenging. Program plans should be formed and amended in a responsible manner, and consider economic sustainability for producers, who are 100% financially responsible for this program. Business decisions of individual producers should not be constrained, provided they meet their regulatory obligations and comply with the conditions of their Membership Agreement. However, the activities of Recycle BC, including any contracted services, should be guided by the pollution prevention hierarchy and the program principles, including economic sustainability.

Recommendation:

- 1) PTHG suggests incorporating the principle of economic sustainability into the program principles.
- 2) PTHG suggests the 5-point focus found in Part 1 - Revised Program Plan Context, should also include an economic analysis in prioritization and implementation.

Communications

As markets for recovered recyclable material feedstock close or become more restrictive, the participation of all stakeholders in improving the quality of the feedstock is paramount to the success of local, provincial and national waste management programs. China has virtually banned the import of recyclable materials by significantly reducing the maximum contamination rate. Thailand has recently announced restrictions on imported electronic and electrical waste and has plans to follow the lead of China for other recyclable materials. Other countries are also considering similar action.

A successful waste management program supports a circular economy by providing valuable and marketable materials. Recycling and sorting capabilities and technologies can vary within different communities, making it important for residents to understand the important role they play in ensuring that after making efforts to reduce and reuse wherever possible, recyclable materials are prepared and sorted properly. Given the success of paper and paper products recovery, it could be assumed that residents are supportive of recycling programs and that communication has been successful in that respect. However, if plastic recovery is creating challenges and confusion resulting in contamination and lower recovery rates, unique focussed messaging and approaches might be needed.

Recommendation:

- 1) PTHG supports targeted consumer P&E campaigns as part of the program's intervention, focussed on improving plastics recovery rates.

Streetscape

As noted during the consultation and in the reports resulting from the streetscape pilot projects, recovery of recyclable materials from streetscape collection has many challenges such as contamination caused by incorrect sorting and materials soiled by liquids. Sorting in the pilot project did improve with time and performance similarities between streetscape and residential collection streams were also observed:

- The amount of residual packaging, paper and organics deposited in garbage bins was similar to that observed in single-family collection programs.
- Printed paper materials were the most correctly sorted by passersby as is the case in residential collections.

The most recent pilot project, 2016/2017 has been completed. Its outcomes and those of the previous pilot could indicate that there is an opportunity for improving recycling in streetscape collection programs in the future, through residential communication plans. However, we would like greater clarification on the application of extended producer responsibility for the program.

Recommendation:

- 1) PTHG would like to suggest that the following be considered in streetscape waste collection and any recyclable material diversion pilots or programs:
 - a) Gather information on the source/producers of waste found in streetscape collection. Given the nature of streetscape collection and similarities between some residential and Industrial, Commercial, and Institutional (IC&I) packaging and paper products, certain locations could contain waste originating in the IC&I sector. In this 100% EPR program, producers typically have the opportunity to evaluate and manage their packaging and paper products through business decision choices. However, in the case of streetscape collection, if producers are not the source of the waste, they do not have the ability to manage those materials or their costs.
 - b) Provide opportunities to discuss streetscape collection cost allocation within the current 4-step fee methodology.

- c) Include an evaluation of the cost effectiveness of using streetscape waste collection as a means of recovering recyclables and prioritize streetscape collection in that respect.

Non-compliant Producers

The BC Ministry of Environment and Climate Change Strategy, Compliance Inspection Report, 2016, included compliance information for the *Recycling Regulations*. The compliance rate was high among the parties inspected. However, no information or estimate was available on the overall compliance of obligated producers with Part 2 – Extended Producer Responsibility Plans of the *Recycling Regulations*. Is this information along with an estimate of the economic impact on the program available?

Recommendation:

- 1) PTHG asks that Recycle BC provide clarification regarding the extent of non-compliant producers, the extent of any resulting financial gap on the program, the amount of resources expended by Recycle BC on non-compliance activities, and the priority of any actions and the part of Recycle BC.

Canada Plastics Strategy

At the June 2018, G7 Summit meeting in Charlevoix, Quebec, Canada tabled a Plastics Charter. The Canadian Council of Ministers of the Environment has begun the process of developing the framework for a Canada Plastics Strategy, which is anticipated in 2019. The Canada Plastics Strategy will be developed in consultation with Canadian stakeholders, resulting in a Canadian perspective and approach to managing plastics' environmental impacts.

Recommendation:

- 1) PTHG recommends that the Recycle BC program and focus be based on producer obligation under the *Recycling Regulations*. The guidelines and direction of the Canada Plastics Strategy and timelines, rather than international actions, could be considered in the context of the program and producer obligation.

PTHG appreciates this opportunity to provide feedback on the proposed Packaging and Paper Product Extended Producer Responsibility Plan. As a producer, we would be interested in discussing opportunities to engage further in the core elements of the program on a regular basis. Should you have any questions or require clarification on any of the above or previous comments provided by PTHG, please feel free to contact me by phone, 905 814-7051 or e-mail, beas4@premiertech.com.

Regards,



Suzanne Beattie
Regulatory Director

The Clorox Company of Canada Ltd. has been a registered steward under the Recycle BC program since the program's inception. Additionally, we have a long established history of supporting British Columbia municipalities since the early 1990's with the design and implementation of highly successful waste diversion strategies that include the utilization of the GLAD® "See Through" Blue Bag. Our Glad® brand is the category leader in the trash space and Glad® is Clorox Canada's largest revenue business, playing a critical role in supporting 377 direct and approximately 1,200 indirect Canadian jobs.

We have analyzed Recycle BC's draft proposed 5-year Packaging and Paper Product Extended Producer Responsibility (EPR) Plan (5 year plan) and we have the following serious concerns:

Expanding the Scope of PPP to "Packaging-Like" Product:

We are completely opposed to expansion of the definition of PPP to "packaging-like" products. The definition of PPP that stewards are obligated to pay for is very clear in the Environmental Management Act and it does not include "packaging-like" products. If the legislature changes the act to include this concept then the plan should address it. Until then, the plan should not include this expansion of the scope of our commitments.

It is important to understand consumer behavior to see why the cost-benefit of including "packaging-like" products doesn't compute. Re-sealable plastic bags are a perfect example. Our research shows that consumers primarily use re-sealable plastics bags for food storage. Recent studies show that 80% of consumers use these bags to store food in the freezer, and 57% use them to store left overs in the refrigerator, as well as bring food to school. This means that these bags are highly contaminated with food residues. Thus they are harder to recycle, less valuable and contributes to higher contamination rates in other materials (which in turn lowers diversion and reduces the value of PPP that is recycled). Expecting consumers to clean re-sealable bags prior to discarding them would require a massive change in consumer behavior and hasn't been successful in any jurisdictions that have tried collecting these materials that we know of.

If you look at other jurisdictions in Canada that have attempted to recycle re-sealable plastic bags there are additional complications. In Peel region in Ontario, consumers must cut the zipper off of the package before recycling and in Toronto they only accept "non-zipper" bags. Non-zippered products represent 8% of the total category. 92% of the category is zippered or slider bags that would require a consumer behavior change to remove the top of the bag prior to recycling. This is a big ask on the consumer considering that many don't even rinse out containers or understand what bin basic recyclables go into.

Finally, as illustrated above, re-sealable bags are used to keep food from spoiling. Food waste in landfills is recognized as an important source of methane, one of the most potent greenhouse gases. According to the FAO, if food waste could be represented as its own country it would rank third in greenhouse emissions behind China and the U.S. Why? In the decade that methane takes to decay to CO₂ it warms the planet by 86 times as much as CO₂, according to the Intergovernmental Panel on Climate Change. In Canada, 40% of food is wasted - 47% of it at the household level (by far the largest source), according to the University of Toronto. By declaring that this important tool in fighting food waste be subject to stewardship fees and

making it ultimately more costly for consumers, Recycle BC may be inadvertently hurting the environment more than helping it by discouraging food preservation. Understanding the potential impact of this proposal from an all-in environmental perspective before moving forward is critical.

Transition from “Single-use” Recycling Bag for Curbside Collection:

We reiterate our strong opposition to the proposed 18 month transition away from recycling bags and ask that this stipulation be struck from existing and future contracts between Recycle BC and its municipal partners.

As a steward competing in a highly-competitive industry facing a double digit cost increases to our stewardship fees in BC next year, we don't support the elimination of a curbside collection solution that has been shown by a recent York University study (attached) to beat carts and boxes on all-in cost, contamination rates, and the value of post-recyclable material, as well as perform better on diversion rates than carts and boxes alone.

Today, the current recycling model is under intense pressure from China's new stringent import quality requirements. In this context, the study points to a cost effective way to add surge capacity to existing curbside collection that will increase diversion and lower contamination today and, long-term, to a system that promises better diversion, contamination and value of post-recyclable materials for a lower all-in cost. China's National Sword initiative has changed the dynamic for end markets that the program has relied on for the recovery of approximately 20% of its costs. The demonstrated ability of none of the present cart, bag or blue box curbside collection strategies to hit the extremely low contamination rates being demanded by the Chinese, make the viability of this strategy suspect and the likelihood of additional cost increases a foregone conclusion.

Additionally, transitioning out of bags eliminates important sources of revenue for the very stewards that support your programs that sell either branded, as is our case, or private label blue recycling bags in the province. This business supports well-paying jobs for hard working Canadians, generates tax revenues at the local, provincial and federal level, as well as investments in manufacturing and R&D here in Canada.

Presently, communities across British Columbia including the District of Mission, Abbotsford, Chilliwack and Salmon Arm have implemented highly successful recycling collection programs that include the use of “see through” blue bags. From the comments submitted by these jurisdictions to Recycle BC as a part of this process, the option to use bags is popular with residents and municipal waste systems alike because they are scalable, easier to manage for disabled or elderly residents, resistant to wind and don't take up a lot of increasingly dear space in BC homes and garages as they can go directly from the kitchen to the curb. Residents in these communities should continue to have the option to use bags.

Even municipalities with cart-based systems have voiced the support for the use to bags for surge capacity. Why should recycled material end up in the trash when there is an easy option available to keep this material out of the landfill? Additionally, bags should be viewed as a

complement to blue boxes in communities where this approach is used as they can help solve wind and surge capacity issues, can go seamlessly from the kitchen to the curb and can help improve the quality of the recyclables in the boxes. Given the pressure on the current recycling model from China, elimination of a solution that is supported by residents and waste management authorities in the municipalities where they are used, only to substitute it for a less effective higher cost option is against the interests of Stewards and the communities that Recycle BC serves.

Recycle BC's proposed move to promote a blue box system as the preferred choice for curbside collection was preceded by a similar approach in Ontario in the 1990s and 2000s. B.C. can learn important lessons from their experience. Today, Ontario municipalities continue to wrestle with the limitations of blue box systems beyond their lack of all-in cost-competitiveness, specifically: litter issues caused by wind and limited scalability. Subsequently, Ontario is experiencing a resurgence of interest in evolving programs to enable residents to utilize see through blue bags to place recyclable contents curbside either with blue boxes or as a stand-alone. This past spring, the region of Halton, Ontario decided to allow residents to use recycling bags to collect and store their recycling materials for collection. Other jurisdictions across the country, like those in Atlantic Canada continue to expand curbside blue bag recycling programs.

In analyzing the processing side of the equation, separating a collection mechanism or tool (blue recycling bag) from waste (shopping bag) is critical. Any survey of MRF operations will show that the overwhelming majority of the bags getting wrapped around machinery are shopping bags and newspaper bags, not blue recycling bags. As such, blue recycling bags shouldn't be made the culprit for down time at municipal recycling facilities. Investments in bag breakers or additional sorting staff to better accommodate recycling bags will also help deal with the shopping bags (which are the real issue) and pale in comparison to the capital investments necessary to implement cart or blue bin programs. While there are challenges with all of the curbside collection mechanisms, bag breakers are being used successfully in municipalities throughout the country and we would be happy to connect you with MRF operators that are currently using them in their systems.

We thank you for the opportunity to provide our feedback and look forward to the opportunity to continue the dialogue with Recycle BC about this proposal.

Sincerely,

Mike Pilato
General Manager
The Clorox Company of Canada



4 September 2018

Recycle BC
230-171 Esplanade West
North Vancouver, BC V7M 3J9

By electronic mail

Dear Recycle BC,

As one of Canada's largest retailers, Costco Wholesale Canada Ltd. is committed to advancing the goals of the circular economy. In British Columbia, we are an active and enthusiastic participant in many stewardship programs, contributing millions of dollars to the responsible recycling of hundreds of products.

Thank you for the opportunity to provide comment on Recycle BC's revised Packaging and Paper Product (PPP) Extended Producer Responsibility (EPR) plan revised in July 2018. We supported the March 2018 draft of the Recycle BC stewardship plan. **However, because of the significant change in scope of products included, Costco opposes this new stewardship plan.**

Costco encourages Government and Recycle BC to remain patient and to focus on providing the best environmental results for British Columbians. It is our view that the continuous improvement model previously emphasized by Government will produce the best environmental outcomes with the least economic disruption.

Scope of Product Included in Plan

Recycle BC's new draft plan expands the scope of the product included in the plan. There has not been adequate consultation on this aspect – the vast majority of impacted stakeholders are unaware of the proposed change in scope.

It is not Costco's view that straws, stir-sticks and utensils are appropriate materials to include in a blue-box collection system where they are a contaminant: we think there are much more appropriate and effective ways of reducing or managing this waste.

Costco wants to ensure Recycle BC and Government fully understand the concern that this expansion has the potential to result in significant amount of public discourse similar to the question surrounding small business exemptions at the program's inception.

Further, we have significant concerns about Recycle BC's ability to manage some of the packaged products it proposes to obligate. Recycle BC has provided no information about how it proposes to manage newly obligated material and during a consultation session provided the answer that such a plan would be developed after plan approval. Costco urges that Government require Recycle BC to develop a collection and material-processing plan **before** any new material



is obligated. Costco notes that a very significant amount of the material Recycle BC proposes to obligate is managed through by the ICI sector's waste collection system. Other material is prevalent in the public space and therefore collection will probably be both more difficult and more costly and therefore other alternatives for managing this material may be preferable.

Government has an obligation to consider whether such a change in scope will be in the best economic and environmental interests of British Columbia. Costco would be pleased to take part in a consultation process and provide input to Government in respect of any proposal to change the scope of products obligated under the Recycling Regulation.

Managing Increases in Scope of Product Included

It is unacceptable that Recycle BC suggests that retailers should report on materials for 2018 for products they have only proposed adding in July 2018. This will cause significant cost and operational impact. In the case that Government decides to increase the scope of materials obligated, producers should only be required to report for the year beginning after plan approval and remit and report for the following year.

Transparency Surrounding Fee and Cost Increases

Costco is concerned that the dramatic expansion in product scope comes only 10 months after an earlier expansion in scope. That expansion, initiated by Government, came after no public consultation. It would be appropriate to know the impacts on Recycle BC revenue, expenses and collection rates resulting from last November's scope expansion before considering another expansion of scope.

Given that obligated producers, and therefore consumers, are already expecting a 50% increase in material fees in 2019, the addition of extensive additional material at this point significantly increases our concern.

It is in the *public interest* that rate-setting happen in the most transparent manner possible. We note with particular chagrin that Recycle BC plans to provide reporting breaking down collection rate by material type – even while it has not reported the volume of materials introduced into the market, or fees, by material type for the past 4 years.

Reporting

Breaking down the quantity of plastics by polymer and package type supplied into the residential market would dramatically increase the cost and operational complexity of the PPP program. Those costs are passed along to consumers and, therefore, this would reduce the affordability of goods purchased by consumers. Conversely, reporting fees and volumes remitted is much more straightforward as this information is supplied in reports and remittances by obligated producers and therefore Recycle BC only need aggregate the information.



The plan proposes to increase the amount of information reported on collection but is silent on the questions of: improving reporting on volumes of material Recycle BC's participants introduce into the market (by material type); reporting fees by material type; or, provide more detailed expense information to allow participants (and other stakeholders) more transparency of operational (including collector compensation), communications, management and board expenses.

In conclusion, Costco notes concerns about the collection of existing materials expressed by a wide range of other stakeholders. Our view is it would be more appropriate for Recycle BC to address those concerns **before** expanding their scope into other products. We note collection concerns specifically surrounding soft plastic, expanded polystyrene, plastic and multi-laminate tubes and flexible plastic packaging. Recycle BC has done some excellent preliminary work on collection of these materials – and on public space recycling – but has not provided a detailed plan on how to adequately address those gaps in the collection process.

Costco urges the regulator to proceed carefully and not to inadvertently cause consumer costs to dramatically increase, or the program to experience undue operational or financial risks.

Costco is deeply disappointed that we are unable to support Recycle BC's revised stewardship plan and **strongly urge the Province to reject Recycle BC's revised stewardship plan.**

Best Regards,

A handwritten signature in black ink that reads "Stu Campana". The signature is written in a cursive, slightly slanted style.

Stu Campana
Manager, Stewardship Programs
Costco Wholesale Canada Ltd.



September 6, 2018

Recycle BC
230-171 Esplanade West
North Vancouver, BC V7M 3J9

Via e-mail: consultation@recyclebc.ca

Dear Recycle BC team:

Re: Packaging and Paper Product Extended Producer Responsibility Plan Consultation

Scotts Canada Ltd. (Scotts) has been engaged in Provincial Waste Policy across Canada for many years. We thank Recycle BC for the opportunity to participate in this consultation.

ScottsMiracle-Gro is North America's leading marketer of branded consumer products for home, lawn, and garden care and serves both the retail and professional grower markets in Canada and the U.S. With a global investment in research, development, and innovation, in addition to industry leading stewardship initiatives and consumer education, Scotts Canada is committed to developing and enhancing lawn and garden care practices in Canada. Headquartered in Mississauga, Ontario, Scotts Canada provides lawn and garden enthusiasts with product choices and education that invite people to "Grow the World You Want™".

We take our role as environmental stewards very seriously and support efforts to ensure that products and packaging have proper end of life management. With this commitment, we also expect that laws, regulations, and programs should lead to true beneficial outcomes for the environment, and British Columbians, while also considering the financial health of the province and the businesses which operate within it. In that spirit, we offer the following comments concerning the proposed Program Plan.

As Recycle BC takes over and expands multi-residential collection, it bears highlighting that there are categories of products that are not typically used by consumers who reside in multi-residential homes. A perfect example is the lawn and garden category. Consumers in apartment complexes for example do not typically use the vast majority of lawn and garden fertilizers and pesticides, so the containers of these products would not need collection from multi-family dwellings. Based on Recycle BC's own principle that "obligated materials should bear a fair share of the costs", there needs to be a mechanism for ensuring these costs are not borne by stewards that do not benefit from them. This same argument also applies to PPP in public spaces and research that targets specific packaging (eg. Plastic bags).

With regards to development of communication and education, the plan is silent on including stewards. Stewards have a beneficial role to play as they have expertise in their packaging and often also in consumer behavior. We recommend that stewards be included in communication development so that their expertise can be leveraged.

Section 5.1 Managing Environmental Impacts speaks to 'a number of Recycle BC member producers [who] have made ambitious commitments to reduce their PPP footprint and are engaged in national and international discussions'. Recycle BC needs to be mindful of the business needs of all stewards not just a selective group. Not all stewards are necessarily in a position to influence packaging decisions, especially when packaging solution decisions are not made in Canada.

In Section 5.4 Reporting, a new activity – GHG performance is introduced. As a steward, Scotts Canada would be interested in the costs of the data tracking system and the standards that will

Scotts Canada Ltd.

*2000 Argentia Road, Plaza 2, Suite 300, Mississauga, Ontario, Canada L5N 1V8
Tel: 905/814-7425 • Fax: 905/814-9077 • Website: www.scotts.ca*



be used to ensure that there is consistency in reporting. Also, how will this information be used to drive improvement?

Scotts Canada supports the inclusion of program cost as a performance metric. Cost efficiency and improvement needs to be a key factor in maintaining the economic sustainability of programs.

We hope that Recycle BC finds these comments helpful in shaping the Program Plan. We appreciate the opportunity to be consulted and welcome further discussions on the program plan and transition. Please do not hesitate to contact me should you require further information related to Scotts products or comments.

Sincerely,

A handwritten signature in black ink, which appears to read "K. Stephenson".

Karen Stephenson
Director, Regulatory Affairs & Stakeholder Relations
P: 905-814-2828
karen.stephenson@scotts.com

www.scotts.ca



CITY OF
CHILLIWACK

Tamara Burns
Executive Vice President, Western Operations
Recycle BC
230-171 Esplanade West
North Vancouver, BC V7M 3J9

August 31, 2018

File No: 5380-01
Engineering Department

Dear Tamara Burns:

Re: Recycle BC EPR Plan – City of Chilliwack Feedback

The City of Chilliwack has reviewed the July 2018 Packaging and Paper Product Extended Producer Responsibility Plan prepared by Recycle BC. The inclusion of single-use items and additional recycling streams, as well as consideration of packaging and products that may be captured by compost programs, are welcome inclusions supported by the City.

As with previous drafts of the 2018 stewardship plan, there are still references to recovering energy from (currently) non-recyclable packaging products within the pollution prevention hierarchy. This continues to be a concern for the City due to the adverse effects that industrial emissions may have on air quality in the region. Regarding the other flexible plastic packaging pilot program, we are concerned about the impacts to the airshed as compared to the fuel sources it is purported to displace. We would recommend that any packaging material processed and sold as a refuse derived fuel be supported with documentation to demonstrate that it is more sustainable than the alternatives and, in particular, that its emissions do not reduce air quality. Please refer to the enclosed copy of the letter submitted on May 14, 2018 for previous comments regarding air quality concerns.

The City supports Recycle BC's inclusion of increased recovery targets and would recommend that a timeline or commitment to enrolling waitlisted depots and communities be included as a means to reach these targets. It is also recommended that "depots per capita" be incorporated as an accessibility indicator.

Thank you for the opportunity to provide feedback on the proposed stewardship plan. If you have any questions regarding the City of Chilliwack's response, please contact the undersigned at 604.793.2701 or tfriesen@chilliwack.com.

Sincerely,

Tara Friesen, P.Eng.
Manager of Environmental Services

Enclosure



CITY OF
CHILLIWACK

Allen Langdon
Managing Director
Recycle BC
230-171 Esplanade West
North Vancouver, BC V7M 3J9

May 14, 2018

File No: 5380-01
Engineering Department

Dear Mr. Langdon:

Re: Recycle BC EPR Plan – City of Chilliwack Feedback

The City of Chilliwack has reviewed the Packaging and Paper Product Extended Producer Responsibility Plan prepared by Recycle BC. The Plan content is fairly broad, so it is unclear if the concerns the City forwarded to Recycle BC in response to your consultation program last fall have been addressed.

The Plan still includes reference to recovering energy from the product within the pollution prevention hierarchy, which continues to be a concern for the City. We would like to take this opportunity to reiterate our concerns about air emissions. Please refer to the enclosed copy of the letter submitted on December 13, 2017 for details.

Our understanding is that there will be an opportunity for municipalities to review and comment on proposed revisions to the collector and depot operator agreements, and we hope the concerns that we raised in our December 13, 2017 letter are taken into consideration when those agreements are amended.

If you have any questions regarding the City of Chilliwack's feedback, please contact the undersigned at 604.793.2701 or tfriesen@chilliwack.com.

Sincerely,

Tara Friesen, P.Eng.
Manager of Environmental Services

Enclosure



Allen Langdon
Managing Director
Recycle BC
230-171 Esplanade West
North Vancouver, BC V7M 3J9

December 13, 2017

File No: 5380-01
Engineering Department

Dear Mr. Langdon:

Re: Recycle BC Consultation – City of Chilliwack Feedback

The City of Chilliwack has reviewed the changes proposed by Recycle BC and has concerns with a number of the proposed changes, as summarized below:

| Topic | Comments |
|---|---|
| Curbside Collection Financial Incentives | <ul style="list-style-type: none">• The financial incentives do not cover the cost of providing recycling collection services.• The administration top up for curbside collection should not be reduced from \$2.50/household, and should be the same regardless of whether collection services are carried out in-house or by a contractor. Providing a lower amount of compensation to communities with contracted collection service does not reflect the fact that contractors' administration costs are ultimately passed on to local government through the contract fees.• The depot top up for curbside collection should be available regardless of whether the local government provides depot services through an agreement with Recycle BC. Regardless of what organization operates the depots, there are depot-related education and promotion costs borne by the local government.• The financial incentives should include an annual inflationary increase.• Many of the proposed changes regarding the curbside collection program are overly prescriptive (e.g. requiring Recycle BC approval of a policy on tagging non-compliant materials, requiring approval of a detailed transition plan in order to change container types, requiring approval of significant promotion and education material regardless of whether it includes the Recycle BC logo, etc.). This level of control creates unnecessary bureaucracy and cost. |

| | |
|----------------------------------|--|
| Single-Use Bags | <ul style="list-style-type: none"> • The use of single-use bags for curbside recyclables should be discouraged but not prohibited. Many residents prefer to use blue bags (e.g. easier in windy conditions) and prohibiting their use may discourage participation in the program. |
| Other Flexible Plastic Packaging | <ul style="list-style-type: none"> • 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. • Recycle BC should ensure no net increase in air emissions related to alternative fuel. The City of Chilliwack is very concerned about air quality in the sensitive, confined, Lower Fraser Valley Airshed. • Given the processing challenges posed by certain types of packaging, Recycle BC and the Ministry of Environment should place more effort on trying to limit the use of unrecyclable packaging materials, either through disincentives or regulatory measures. For example, Recycle BC could charge producers a higher levy if they select packaging that is unrecyclable or is very difficult to recycle. |
| Recycling Depots | <ul style="list-style-type: none"> • A standard should be established to ensure residents from all communities have fair and equitable access to Recycle BC supported depots. There are only two Recycle BC depots in Chilliwack and the City has been bearing the expense of operating two additional depots to handle the local demand. Our depot operating costs increased from \$200,000/year to \$340,000/year due to the Recycle BC program because we had to expand the depots to include foam packaging and separated glass and film plastic. • Depot financial incentives should be consistent regardless of whether the depots are owned/operated by local government or the private sector. It is not reasonable to eliminate compensation for fibres and plastic containers at government depots. Even residents with curbside recycling service require depots from time to time (e.g. Christmas holidays, moving, etc.) and many residents in multi-family dwellings do not receive collection through Recycle BC. The depots would not be economically viable without compensation for fibres and plastic containers. |

If you have any questions regarding the City of Chilliwack’s feedback, please contact the undersigned at 604.793.2701 or tfriesen@chilliwack.com.

Sincerely,



Tara Friesen, P.Eng.
 Manager of Environmental Services

September 5, 2018

Tamara Burns, Vice-President, Supply Chain
Recycle BC
230-171 Esplanade West
North Vancouver, BC V7M 3J9
VIA EMAIL: consultation@recyclebc.ca

Dear Mrs. Burns:

RE: Recycle BC Revised Program Plan July 2018 - City of Vancouver Submission

Thank you for the opportunity to provide feedback on the July 2018 version of Recycle BC's draft Packaging and Paper Product Extended Producer Responsibility Plan. With the modifications made in this revised version, Recycle BC has shown it takes consultation seriously and is open to improvements. We agree with comments provided by Metro Vancouver staff, and have provided some additional comments in this letter.

Single-Use Items

We applaud the changes to Recycle BC's plan to support the G7 Plastics Charter, especially broadening the scope of obligated materials to include packaging-like products and single-use plastic items. As you know, Vancouver City Council approved a Single-Use Item Reduction Strategy in June 2018 for plastic and paper bags, disposable cups, take-out containers, utensils and straws. We look forward to partnering with Recycle BC on common areas of interest, such as:

- Researching solutions for compostable single-use items and packaging, including collection systems and end-markets;
- Collaborating with producers to expand extended producer responsibility (EPR) to compostable single-use items, as well as single-use items generated by the industrial, commercial and institutional (ICI) sector;
- Education and behavior change programs aimed at reduction and reuse;
- Cup, container and bag exchange programs; and
- Establishing targets and key performance indicators to reinforce the reduction, reuse, and recycling of single-use items specifically.

Reduction and Reuse

Vancouver City Council also recently adopted Zero Waste 2040, a strategic plan with a goal of achieving zero waste to landfill or incinerator by the year 2040. Recognizing that we can't recycle our way to zero waste, the strategy also aims to maximize efforts at the highest levels of the waste hierarchy.

This approach is mirrored in the Recycling Regulation, which requires producers to manage their designated products according to the order of preference in the pollution prevention hierarchy as defined in the regulation. This means one level of the hierarchy should not be undertaken until all feasible opportunities at a higher level have been taken. Unfortunately, Recycle BC's plan still does not address the higher levels of the hierarchy—redesign, elimination, reduction and reuse—and instead focuses on the lower levels of recycling and energy recovery. While we recognize that Recycle BC acts as an agent of the Stewards, we see a role for Recycle BC in working with the Stewards around changes to packaging protocols to reduce generation and ensure that the remainder can be recovered. Further changes are needed in the plan to include targets and actions that move packaging and paper products up the pollution prevention hierarchy.

Depot Incentives

We feel the compensation methodology detailed in Section 4.3.2 of the plan does not meet the Recycling Regulation requirement to adequately cover collection costs, or the requirement in the Ministry's guidance document, *Producers Paying the Cost of Managing Obligated Materials and Dispute Resolution (April 24, 2018)*, to provide a transparent methodology. The draft plan lists the range of variables that may be considered, but doesn't explain how these variables are used or weighted to calculate the incentives.

Currently there is a significant discrepancy between the average depot collection costs found in Recycle BC's cost study¹ (\$301/tonne, not including the cost of land) and the average incentive received by depots from Recycle BC (\$66/tonne in 2017 for the City of Vancouver). In response to complaints from depots about compensation for low density materials, Recycle BC has proposed rate increases for foam and film in 2019. However, even with these increased incentives, our anticipated depot revenues from Recycle BC will only increase to \$85/tonne. We will still have to subsidize the program by about \$216/tonne, or roughly \$389,000 each year.

Having participated in the Recycle BC cost study, provided written feedback on this issue, and raised it during the consultation in person and online, we are now left without an explanation on the gap between cost and revenue, and no further option to negotiate higher financial incentives within the methodology presented in Section 4.3.2.

Streetscape Incentives

We are pleased to see that Recycle BC has made a commitment to consult on a financial offering for streetscape collection and recycling services by mid-2019, and we would be willing to discuss with you our experience with the true cost to deliver this type of service. If after releasing the financial incentives a local government declines the offer by Recycle BC to provide streetscape services, we believe that municipalities should be provided with the option for Recycle BC to provide for the collection, recycling services, public education, promotion and be first point of contact for streetscape collections. If this pathway is not contracted by, or directly managed by Recycle BC, then it should be tracked as unmanaged product and the quantities of printed paper and packaging (PPP) reported within the annual report as having been managed outside of the stewardship program.

¹ Packaging and Paper Product Collection Costs, Five Year Cost Study Refresh by Glen Williams Accounting (May, 2018) Accessed Aug 31, 2018: https://recyclebc.ca/wp-content/uploads/2018/06/PPP-Collection-Costs_Five-Year-Cost-Study-Refresh.pdf.

Education and Awareness

Contamination in material streams is an expensive operational challenge for Recycle BC, which could be improved through a greater level of understanding by residents of how to properly sort and recycle. A consumer awareness target that seeks to measure how well residents can identify program materials vs non-program materials and to sort them properly would be an effective awareness metric. Web-based tools (sorting games) already in use by some organizations could be utilized to support inclusion of this metric within Recycle BCs plan.

We recognize that China's restrictions on recycling commodity markets has created a strain on global markets, and that Recycle BC is doing everything it can to avoid a reduction to the 'basket of goods' currently accepted for collection within their program. You have shown great ingenuity in being able to expand your accepted materials over the first few years of operation. However, if as a result of market conditions Recycle BC is forced to remove packaging types from the 'basket of goods' currently accepted in curbside, multi-family or depot collection streams, we feel Recycle BC should be responsible to conduct the education and awareness campaigns of the change to all BC residents. This will offer a balanced approach to education and awareness spending between municipalities and Recycle BC.

We are pleased to continue to work as a partner with Recycle BC on providing recycling services to our community members for PPP, and to work towards zero waste. Please do not hesitate to contact me for further discussion of any of these matters.

Yours truly,



Albert Shames
Director, Zero Waste and Resource Recovery

tel: 604.873.7300

e-mail: albert.shames@vancouver.ca

cc: Teresa Conner, Senior Policy Advisor, Environmental Standards Branch, Ministry of Environment and Climate Change Strategy

Paul Henderson, General Manager, Solid Waste Services, Metro Vancouver

Metro Vancouver's Regional Engineering Advisory Committee (REAC) and Regional Engineers Solid Waste Sub-Committee members

**Engineering and
Public Works
Department**

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September 6, 2018

Tamara Burns
VP Supply Chain, Recycle BC
220 – 171 Esplanade Way
North Vancouver, BC V7M 3J9

Dear Tamara Burns:

Re: Recycle BC Draft Program Plan

Thank you for the opportunity to provide feedback on Recycle BC's draft packaging and printed paper (PPP) extended producer responsibility plan. The purpose of this letter is to present City of Victoria staff feedback on various aspects of the proposed program plan. The City has set ambitious targets to manage waste sustainably and to reduce GHG emissions from waste operations - goals that align with the objectives of the proposed Recycle BC plan.

The City has recently adopted its *Climate Leadership Plan*, which identifies a central strategy to reduce overall waste generation as well as organics disposal, while realizing the economic and community benefits in the process. One of the goals of the City's *Official Community Plan* addresses the need for a more streamlined and efficient waste system and "to work with the Capital Regional District (CRD) and the private sector to develop and maintain a system that sorts the three streams of solid waste at the unit level, building level and in every neighbourhood including for recyclables, organic material and residual garbage." Additionally, the City's *Strategic Plan* states an outcome for the City to handle waste in a more responsible way, and to make garbage disposal less convenient than recycling.

The CRD has provided valuable regional comments in their letter dated December 15th, 2017 regarding proposed changes to the program through the consultation process. This letter outlines the City's commentary to achieve desired sustainability and waste reduction improvements.

MULTI-FAMILY HOUSEHOLD COLLECTION

On Page 12 of the plan it states: "Recycle BC will review multi-family household participation levels annually 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." Between 2007 and 2017, Victoria's population increased by 9.9 percent with the majority of the increased population living in newly constructed multi-family residences. As part of Recycle BC's plan for continuous improvement in all recycling levels and to take into account the increased growth and projected trend toward further development of multi-family residences, Victoria recommends that Recycle BC include a separate and specific multi-family collection target to better address the gaps in materials collected from this sector.

SINGLE USE ITEMS AND POLLUTION PREVENTION HIERARCHY

The proposed plan will increase scope of materials covered to include single use items that go with containers (e.g. utensils), and packaging-like products (e.g. pie plates and Ziploc bags), however the plan does not include targets to reduce single use items and the focus is primarily on recovery and recycling. Victoria recommends that Recycle BC maintain a more significant focus on higher-order avoidance and reduction initiatives (on the hierarchy of waste management). This attention would include ambitious programs to reduce packaging and the City further requests Recycle BC inform stakeholders how they are working with producers to significantly reduce or avoid packaging overall.

STREETSCAPE RECYCLING

On page 14 of the plan it states: "Recycle BC will continue to perform further research through streetscape collection projects to determine alternate approaches to streetscape collection. Recycle BC will consult on program design and financial offering if they find a suitable model and if streetscape programs are implemented, would offer financial incentive to local governments to collect materials within certain criteria." Clarifying this commitment with action information and timings would provide clarity for City of Victoria staff to plan complimentary strategic and operational initiatives to reduce waste in the public realm. As a result, Victoria requests that additional details regarding Recycle BC's research plans including a timeline for implementing streetscape recycling programs to increase diversion.

COMPOSTABLE PACKAGING

The plan indicates that Recycle BC does not intend to include compostable packaging in their portfolio of PPP, but that it may rather only report on work at the local level to reduce compostable packaging as part of the kitchen scrap program. Given the rising rate of compostable packaging in the marketplace and the provision in the Provincial Recycling Regulation requiring industry to develop and manage stewardship programs for their products, Victoria recommends that Recycle BC include compostable packaging as part of the PPP programs, and consider initiatives that would facilitate sustainable processing of end-of-life compostable packaging.

GHG REPORTING

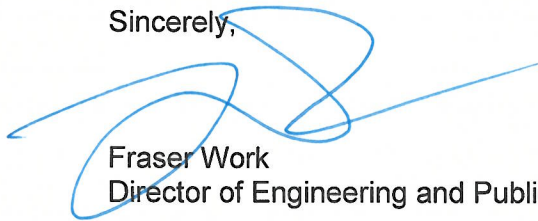
Recycle BC appears to be reporting on program performance at the provincial level and not reporting for each individual region. The City acknowledges the importance of suitable, accurate measuring and monitoring to inform more sustainable behaviour and consumption patterns. Victoria recommends that Recycle BC collect and disclose regional and local data to help inform local government climate action.

CONCLUDING COMMENTS

City of Victoria staff would like to commend Recycle BC on its comprehensive PPP extended producer responsibility plan. This plan will help to improve recycling efficiencies and raise awareness around more sustainable packaging production. Should you have any questions related to this submission, please do not hesitate to contact me at fwork@victoria.ca.

Thank you for considering our input.

Sincerely,



Fraser Work
Director of Engineering and Public Works

- c. Assistant Director Public Works
Assistant Director Engineering, Manager Waste Management,
Manager Sustainability

Chloe Boyle
Environmental Technologist I
Cowichan Valley Regional District

RE: Recycle BC Revised Program Plan – Phase II Feedback

- 1. Recycle BC needs to assume financial responsibility for all costs associated with collecting Packaging and Printed Paper (PPP).** Currently, the incentives provided by Recycle BC are not sufficient to cover the true cost of collecting material at curbside and at depots, and transporting the material to processing facility. Neither do the incentives cover the costs associated with large-scale contamination reduction campaigns. Recycle BC states in the Program Plan that the incentives for different materials are different because of the “unique characteristics” associated with each material type. Similarly, regions throughout British Columbia have unique characteristics in terms of challenges and opportunities for collecting PPP. Recycle BC funding should reflect the true cost of collecting material.
- 2. Producers and consumers need to be paying more to cover the costs of recycling PPP.** With the China Ban, the market for recycled material is has diminished. To cover the lost funding associated with recycling, and ensure that recycling material is viable in the future, producers of hard to recycle PPP and consumers need to be paying more.
- 3. Recycle BC needs to provide more support for communication and education.** Contamination is a threat to PPP recycling, and the current education and communications support provided by Recycle BC is not effective at reducing contamination. Current campaigns and promotional material developed by Recycle BC are focused on multi-stream recycling, and not on Province-wide recycling programs. The educational materials are very basic in nature, and even sometimes promote confusion and contamination through inadequate distinction between depot-only and curbside accepted PPP. Current funding for education does not cover the costs associated with large scale contamination reduction campaigns including curbside recycling audits.
- 4. Recycle BC needs to deliver a comprehensive plan for redesign of materials and incentivize the use of PPP made from recycled materials.** Currently the program plan states that individual producers are working towards designing materials that are easier to recycle. Recycle BC needs a comprehensive plan to ensure that all producers of material are working towards recyclable materials, which could include facilitating the sharing of best practices in material production. Recycle BC needs to incentivize the use of PPP made from recycled materials, effectively closing the recycling loop and driving innovation in packaging design.
- 5. Recycle BC needs to deliver a comprehensive plan for reduction and reuse of PPP.** Recycle BC stated that in particular plastic and marine plastics have become a global issue. Recycle BC needs a comprehensive plan focussing on the entire pollution prevention hierarchy, including targets for reducing highly contaminating PPP. Now that Recycle BC will cover single-use plastic items like straws, and plastic-like packaging, Recycle BC should develop targets for reducing the use of items like plastic bags and straws.
- 6. Recycle BC needs a more detailed plan to address issues of ‘biodegradable’ and ‘compostable’ packaging which contaminate both plastics recycling and organics composting streams.** The standards and certifications, along with terminology, associated

with biodegradable and compostable packaging are confusing to residents. Recycle BC should work closely with producers and certifiers to address inconsistent standards. If the material is not recoverable from these items, Recycle BC should work with these producers to develop new materials, such as with the other flexible plastic packaging research and development project.

7. **Recycle BC needs to expand to cover PPP from the ICI sector.** The current program uses a recovery statistic based only on the program participants, which does not reflect the true quantity of PPP being produced and recycled. Recycle BC should cover all PPP that is produced or enters into the Province of BC.
8. **Recycle BC needs to take initiative on establishing return-to-retail drop off locations for PPP.** The London Drugs partnership was very successful, but Recycle BC should not wait until more big box businesses contact Recycle BC to establish residential drop-off locations. Recycle BC should take active steps to reach out to large distributors of PPP material, to make it as easy as possible for residents to drop-off PPP. The more options residents have for recycling, and the more residents are reminded of recycling, the more material will be captured effectively.

August 13, 2018



KITIMAT

DISTRICT OF KITIMAT
270 City Centre
Kitimat, British Columbia
Canada V8C 2H7

Phone 250.632.8900
Fax 250.632.4995
www.kitimat.ca

Recycle BC Consultation
230-171 Esplanade West
North Vancouver, BC
V7M 3J9

To whom it may concern,

Re: Consultation on Revised Program Plan

At the Regular meeting of council held August 7, 2018, the District of Kitimat municipal council resolved:

"THAT a response be forwarded to Recycle BC's consultation plan indicating support for:

- (a) Improved curb side collections for local governments,
- (b) Expansion of multi-family collection options,
- (c) Depot network expansion to address underserved regional districts and remote communities, with rural communities drive time limited to 30 minutes,
- (d) Potential channels for streetscape collection, and
- (e) Assess compostable packaging

For further clarification on (C), we are requesting 30 minutes based on definition of rural. For the District of Kitimat, our municipality is an incorporated local government of over 8,000 and if we are considered rural; a 45-minute drive to the nearest depot is not reasonable.

Respectfully,

A handwritten signature in black ink, appearing to read "Warren Waycheshen". The signature is fluid and cursive, written over a light blue horizontal line.

Warren Waycheshen
Chief Administrative Officer

From: Barry Azevedo, Manager of Environmental Services | bazevedo@mission.ca

18 July 2018

In addition to the comments already noted regarding recyclable products and ICI recycling not being included in the Recycle BC program and the opportunity for Recycle BC and the Province to include this to significantly increase collection and meet plastics recovery goals, I would also like to add that Recycle BC currently does not allow private haulers that service residential units (both multi-family and single-family) to drop off collected recycling for free at appropriate Recycle BC facilities. Instead this residential recycling is directed to MRFs outside of the Recycle BC program where they have to pay a tipping fee. If this residential recycling was included, it would help Recycle BC and the Province to meet its targets. Why would Recycle BC not allow private haulers to drop-off residential recycling at appropriate Recycle BC facilities for free?

Thanks,

Barry

Barry Azevedo, P.Eng.

Manager of Environmental Services

Recyclable products (eg. Rubbermaid sandwich containers) and ICI recycling (eg. the blue box of office paper and yoghurt containers under an office worker's desk) should be included in the Recycle BC program. This material has the potential to significantly increase collection and meet plastics recovery goals. I appreciate that the Recycling Regulation does not currently require Recycle BC to collect ICI recycling, however, some of the material in the ICI recycling program are from workers who brought the packaging from home most likely as part of lunch and snacks and is therefore residential recycling which should be included in the Recycle BC program.

In addition, Recycle BC currently does not allow private haulers that service residential units (both multi-family and single-family) to drop off collected recycling for free at appropriate Recycle BC facilities except where the occasional private hauler has signed as a collector with Recycle BC. For the many private haulers that have not signed up with Recycle BC, this residential recycling is directed to MRFs outside of the Recycle BC program where they have to pay a tipping fee. If this residential recycling was included, it would help Recycle BC and the Province to meet its targets. Recycle BC should allow private haulers to drop-off residential recycling at appropriate Recycle BC facilities for free.

Thanks,

Barry

From: Jennifer Meier, District of Mission, Environmental Coordinator | jmeier@mission.ca

Given the plastics crisis, is there any thought given to reducing the amount of packaging produced in the first place, i.e., implement source control, and what's the incentive to reduce for producers, if there is great effort being made in accommodating problem packaging, such as multi-laminates that are slated for WTE?

I may have missed this in the presentation, but are the increased recovery targets geared towards absolute numbers? As far as actual environmental benefit, increased diversion rates are only meaningful, if the actual amount of packaging disposed of is decreased. If we now decrease 22% of all consumer packaging produced, but for whatever reason, be it marketing, be it increased consumption, 150% more packaging is produced, we're no further ahead.

Copying the province on this feedback, as I think the above, while relevant to Recycle BC's plan, may require a larger context than consumer packaging, especially in light of the deteriorating plastics recycling situation.

Sincerely,
Jennifer

File: CR-24-03-EPR-12

SEP - 5 2018

Ms. Tamara Burns, Vice President Supply Chain
Recycle BC
230-171 Esplanade West
North Vancouver, BC V7M 3J9
VIA EMAIL: consultation@recyclebc.ca

Dear Ms. Burns:

Re: Recycle BC Packaging and Paper Product EPR Plan (July 2018) – Metro Vancouver Submission

Thank you for the opportunity to provide comments on the draft (July 2018) Packaging and Paper Product Extended Producer Responsibility Plan. In particular, this Plan makes notable progress in developing new options to collect and recycle single-use items and packaging-like products, which may simplify the recycling experience for residents and will hopefully divert additional materials/products from disposal in the garbage. Metro Vancouver staff would like to submit the comments below as feedback on the Recycle BC Packaging and Paper Product (PPP) program. Member jurisdictions may also submit comments on behalf of their own communities.

Metro Vancouver staff comments:

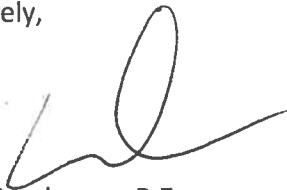
- **Public Realm Collection:** Public realm recycling collection (i.e., streetscapes and parks) requires further clarity in the PPP Plan, for local governments to understand whether Recycle BC's proposed offer will meet the requirements of the Recycling Regulation. Recycle BC's PPP Plan identifies a number of key challenges (e.g., contamination and markets) to launching a full public realm recycling program at this time. If a public realm recycling program cannot be implemented due to current conditions, other potential options that Recycle BC may consider include: additional studies to improve sorting of materials to reduce contamination, funding contributions to municipal public realm litter collection or other similar measures.
- **Master Services Agreement and Statements of Work:** Recycle BC's overall financial offer for local government collectors is complex, and the new contractual documents involve modifications to market clearing prices, education and administrative top-ups, service level failure credits (i.e., financial penalties), and additional costs for implementing contamination remediation plans. Key implementation approaches, such as the methodology for producers paying the cost of managing obligated materials, should be included in the PPP Plan in order for 'efficient'/typical local government collectors to make informed decisions regarding the level of cost recovery provided by Recycle BC's incentives.

26592283

- **Universality/Level Playing Field:** Recycle BC’s approach to depot expansion “to where existing community services are located (e.g. a primary shopping hub) in order to ensure any incremental depot location make meaningful contribution to collection volumes and to convenience without duplication of transportation and with minimal cannibalization of collection volumes from existing depots” does not provide a clear indication for when new collectors will be added. The language in the PPP Plan should be precise, and it should present clear and consistent procedures to ‘onboard’ collectors and depots which meet the Recycle BC collector criteria.
- **Performance Measures:** The July 2018 version of the PPP Plan makes significant progress, compared to the prior Plan, in establishing an overall target of 78% recovery rate, and timeline to achieve the target. In addition, material-based targets and timelines demonstrate additional progress. However, further transparency in the reporting of the overall recovery rate is required, so that stakeholders are clear which of the underlying trends are driving changes in the recovery rate. For example, as it is currently calculated, an increase in the recovery rate can be the result of both of the following underlying trends:
 - Greater amounts of PPP collected
 - Greater amounts of contamination and garbage placed in to recycling containers.

We look forward to participating in upcoming discussions related to the PPP Plan. Please do not hesitate to contact me for further discussion on any of these matters.

Sincerely,



Paul Henderson, P.Eng.
General Manager, Solid Waste Services

PH/AD/ah

cc: Teresa Conner, Senior Policy Advisor, Environmental Services Branch, Ministry of Environment
Regional Engineers Advisory Committee and Regional Engineers Solid Waste Sub-Committee
members



qathet
REGIONAL DISTRICT

September 5th, 2018

DEAR RECYCLE BC

The qathet Regional District (formerly Powell River Regional District) is writing to extend support for the revised Packaging and Printed Product Extended Producer Responsibility Plan. A report was submitted to the Board (August 16th, 2018 – Motion carried unanimously) detailing some of the plan's improvements including expanding the scope of PPP, accessibility performance of curbside collection options, multi-family collection expansion, depot network expansion to address under-serviced Regional Districts and remote communities, increased access to First Nations, Streetscape recycling and research into compostable packaging. The report also highlighted the global plastics crisis and Recycle BC's role in helping Canada meet its 2018 plastics Charter objectives. The qathet Regional District supports the revisions to the draft plan designed to increase the plastics recovery rate and prevent leakage into the environment.

SINCERELY,

MIKE WALL
Manager of Asset Management and Strategic initiatives

LET'S TALK TRASH
Waste Reduction Educators



August 22, 2018

Recycle BC
230-171 Esplanade West
North Vancouver, BC
V7M 3J9
Via Email: consultation@recyclebc.ca

To Whom It May Concern:

RE: Recycle BC Consultation on July 2018 Draft Program Plan

The Regional District of Kitimat-Stikine is pleased to submit this letter in response to the revised Packaging and Paper Product (PPP) Extended Producer Responsibility Plan prepared by Recycle BC and released in July 2018.

The primary changes to the draft issued in March 2018 pertain to an expanded scope of included materials and the introduction of material specific collection and recycling performance targets. While these are welcome additions to the plan, the concerns our Regional District has repeatedly raised since the original plan was made available remain outstanding. We are becoming increasingly frustrated by the exclusivity of the eligibility criteria for curbside collection programs and a lack of flexibility regarding bulk drop-off to Recycle BC depots from remote rural communities.

1. Eligibility for Curbside Collection Program - Financial incentive and post-collection services

The original stewardship plan, dated April 8, 2013, had minimal eligibility criteria for communities wishing to benefit from Recycle BC's financial incentive for curbside collection. The requirement was that a PPP and/or garbage collection system be in place by the time the plan came into effect in May 2014.

Rather than update the eligibility criteria by moving the cut-off to a later date, the proposed plan adds new criteria that increasingly restricts community eligibility to financially benefit from the Curbside Collection Program. The financial incentive for curbside collection is now limited to communities that meet the following criteria:

- Incorporated municipalities;
- Population over 5000, and
- A curbside collection program in place by May 2014.



These Curbside Collection Program requirements prevent fair access to the program, which should benefit all British Columbians.

Communities in Electoral Areas B, C, and E, the District of New Hazelton, the Village of Hazelton, and the District of Stewart in the Regional District are all excluded by the eligibility requirements. Communities in Electoral Areas C and E, which are adjacent to the City of Terrace, have a combined population of over 6,800 and should not be excluded based on being unincorporated. Garbage and recycling collection was provided by the private sector prior to May 2014, and first provided as a Regional District service in November 2014. Organics collection was introduced in November 2016.

The City of Terrace and the Regional District have worked hard to provide consistent, coordinated services across their jurisdictions. The primary difference is that the City receives support from Recycle BC to offset the cost of PPP management, and the 6,800 residents in the Regional District collection service do not. Recycle BC's post-collection facility for the City of Terrace is in Electoral Area E, which already manages the PPP from the electoral areas. As such, no arguments can be made that hauling distances are too far or that the facility does not have capacity for the additional PPP.

It is not fair that residents of unincorporated areas are required to pay more to have their PPP collected and managed than a municipality within the same solid waste service area.

2. Access to Depots and Bulk Delivery to Depots

Outside the more urban areas, the Regional District has developed unique solutions to provide good access to recycling for First Nations and more rural communities. At tax payer expense, the Regional District has established a convenient recycling depot at the newly constructed Kitwanga Transfer Station. The depot is operated in full compliance with Recycle BC standards. The depot also allows for bulk delivery of PPP collected by community partners. Having one party dropping off PPP from 200 households is more efficient than households individually driving materials to the depot. The depot at Kitwanga could become a Recycle BC depot and help Recycle BC fill a significant gap in its network of depots. To realize this benefit it is imperative that bulk drop off from community partners be eligible under the Recycle BC program.

Bulk delivery of materials to a Recycle BC depot would increase user convenience, improve diversion of materials, and be more cost effective overall.

The Regional District has been advocating for inclusion in the PPP stewardship program since 2013. During the initial roll out, we understood that there was little room for exceptions or creative solutions, so we patiently waited to be added to the program. While waiting, we developed and implemented a full-service curbside collection program in our Terrace Service



Regional District of
Kitimat-Stikine

Area and introduced innovative rural recycling initiatives. Each time Recycle BC invited feedback, we made a case for inclusion in the program. However; our requests and feedback have yet to influence the program plan, and the new eligibility criteria for curbside programs mean we are now further away from inclusion than we were 5 years ago. Although Recycle BC claims that its program is designed to focus on outcomes not processes, and that the plan sets the stage for evolution, it appears there is a strict adherence to rules. The reluctance to explore innovative solutions will impede improved provincial materials diversion.

The Regional District wishes for a collaborative and cooperative relationship with Recycle BC for the benefit of our residents. We are delighted that our member municipality of Terrace benefits from your program, and that the District of Kitimat is poised to do the same. The Regional District and Recycle BC share common goals of providing convenient, cost effective ways of diverting PPP from landfilling. We are keen to work with Recycle BC to ensure that our programs meet or exceed all requirements. To date, we understand from Do Your Part Recycling that our curbside PPP contamination is low. We are certain that our participation can have a positive impact on Recycle BC's diversion targets and look forward to joining the rest of the province in making BC a true leader in product stewardship.

Yours truly,

Philip Germuth
Chair

PG/eb

cc: Bob McDonald, Director of Extended Producer Responsibility with the Ministry of Environment & Climate Strategy
Teresa Conner, Senior Policy Advisor with the Ministry of Environment & Climate Strategy
Eric Pierce, Environmental Protection Officer with the Ministry of Environment & Climate Strategy
Board of Directors of the North Coast Regional District
Board of Directors of the Bulkley-Nechako Regional District
Board of Directors of the Peace River Regional District
Board of Directors of the Fraser-Fort George Regional District
Board of Directors of the Northern Rockies Regional District
Board of Directors of the Cariboo Regional District

September 06, 2018

Tamara Burns
Executive Vice President, Western Operations
Recycle BC
230-171 Esplanade West, North Vancouver
BC V7M 3JR

Dear Tamara Burns,

Re: Recycle BC Packaging and Paper Product EPR Plan – FVRD Staff Feedback

The Fraser Valley Regional District (FVRD) Environmental Services department has reviewed the July 2018 Packaging and Paper Product Extended Producer Responsibility Plan and thank you for the opportunity to provide comments. The FVRD is pleased to see progress specifically with the inclusion of new options for collection and recycling of single-use items and packaging-like products such as aluminium foil and re-sealable plastic bags. Performance measures is another area that the FVRD is pleased to see Recycle BC make progress with by establishing an overall target of 78% recovery rate and target timeline.

Despite this progress with the plan the FVRD has large reservations about the pilot project for Other Flexible Plastic Packaging. This material will be dropped off by members of the public under the pretense that it is being recycled. It is not being recycled and is in fact being incinerated despite assurances in consultation under the first plan that no excess material would go for energy recovery. This is a slippery slope for future materials to be considered for recycling and is disingenuous to the public.

The FVRD is concerned that adding a further source of materials for incineration will add to the industrial emissions and the adverse effects which impacts our sensitive air-shed and the air quality in our region as well as the health of our citizens. This category of material is one that the plastic industry should reconsider in terms of its potential for recycling and provide multi-component materials which can readily be recycled. One such program is the Recycle Ready Technology by Dow and packaging used by those brands using the standardized labeling system – How2Recycle. If this exists why does a pilot project need to be conducted by Merlin Plastic? More emphasis under the circular economy should be placed further up the chain?

There are other areas that FVRD staff feels Recycle BC should reassess and strengthen the draft EPR plan. These areas are provided below:

- ① Streetscape and Public Realm Collection: Given the difficulties with contamination of streetscape material Recycle BC should work to reduce this contamination through future research of container type, bin signage and other design elements. These requirements play an important role in potentially reducing contamination and should be a main component of any future research.
- ① Performance Measures: FVRD staff would like to see more transparency and clearer guidance in the reporting of overall recovery rate through the material based targets. This will make it clear what is leading to improvement in results or the opposite.
- ① Depot Expansion: It is not clear in the plan when new collectors will be added. Guidance needs to be clear as to how potential new collectors and depots 'onboard' and the procedure for doing so. At

present the language is not clear and it does not present a level playing field. FVRD staff support an indicator of 'depots per capita' as an accessibility standard, which was raised by the City of Chilliwack.

The FVRD is supportive to see that Recycle BC and other stewards are paying more attention to First Nations and recycling. The FVRD is home to a large number of First Nations and staff would be glad to help facilitate communication between Recycle BC and First Nations in the region.

Thank you for the opportunity to provide feedback on the proposed stewardship plan and we look forward to participating in upcoming discussions related to the plan. Do not hesitate to contact me if you have any questions related to the feedback in this letter.

Sincerely,

Jamie Benton
Environmental Services Coordinator – Solid Waste
jbenton@fvrld.ca
604-702-5021

Tera Grady, Cariboo regional District

Feedback: Recycle BC's Draft Program Plan (July 2018)

This feedback is intended for both Recycle BC and BC Ministry of Environment, as some recommendations are not within the control of Recycle BC.

3. Packaging and Paper Product

ICI packaging that does not have well established recycling markets (i.e. most items other than OCC) should be included in the Recycle BC program.

4.3.5 New Curbside Programs

In keeping with section 4.1 PPP Program Delivery Principle's, first bullet: *"Focus on outcomes, not process - maximize recovery, maximize efficiency, enhance resident service levels while minimizing complexity;"* Section 4.3.5 should be amended to allow electoral area populations adjacent to existing curbside RBC funded collection routes to join the program.

The date of when a garbage collection program was in place should not restrict new PPP curbside programs, updating the May 2014 date to a minimum number of years of garbage service would be more appropriate.

4.3.9 First Nations Recycling Initiative

PPP generated from FN communities with population less than 500 should not be considered ICI material. These communities should be able to operate depots on IR and transport the material to the closest RBC depot, the same as satellite depots.

This section should include a commitment to working with Indigenous Services Canada to co-ordinate service provision to small rural First Nations communities.

The commitment of two additional FN communities per year being added to the RBC program is too restrictive. The Cariboo Regional District alone is home to 16 different First Nation Bands.

Thank you,

Tera D. Grady, BSc, RPF

Supervisor of Solid Waste Management

tgrady@cariboord.ca



Making a difference...together

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September 5, 2018

File: 5200-40
Solid Waste Diversion
Stewardship Programs

Tamara Burns, VP, Supply Chain
Recycle BC
230 – 171 Esplanade West
North Vancouver, BC
V7M 3J9

Dear Ms. Burns:

RE: PACKAGING AND PAPER PRODUCT EXTENDED PRODUCER RESPONSIBILITY PLAN

Thank you for the opportunity to provide staff feedback on Recycle BC's proposed Packaging and Paper Product (PPP) Extended Producer Responsibility (EPR) Plan. We have reviewed the proposed revised five year stewardship plan and agree, in principle, with Recycle BC's renewed vision of expanding the collection and scope of PPP and increasing the general recovery rate as well as providing material specific targets.

While we commend the tremendous accomplishments Recycle BC has made since its stewardship program was implemented, an ongoing concern for the CRD is the level of funding for depots in our electoral areas. As pointed out in our letter dated December 15, 2017, the service model provided by non-profit recycling societies on the Gulf Islands is unique and not comparable to other private and public depots in the province. We believe that the funding shortfall for the Gulf Islands' depots does not meet the intent of the BC Recycling Regulation as the financial incentives offered by Recycle BC do not pay the costs for collecting and managing PPP at these facilities.

In the Capital Region, it is understood that only about 2,000 of over 45,000 multi-family units are part of the Recycle BC PPP collection program, thus leaving our region without a significant Recycle BC presence in multi-family collection. We are receiving increasing inquiries from multi-family residents about changes in their recycling programs and the types of materials accepted by private haulers; this is likely a result of recent global market changes. A greater Recycle BC presence would help provide consistency in multi-family collection and it is suggested that Recycle BC establish regional targets and timelines for increasing multi-family collection services.

We appreciate that streetscape collection and recycling services have unique challenges which have increased since the closure of Chinese commodity markets. The stewardship plan makes a general commitment to further research and consultation. It would be helpful to provide more details about your research plans and a timeline for implementing streetscape recycling programs.



The addition of single-use plastic items to the PPP program and municipal business regulations to ban disposable packaging will aid in reducing contamination in streetscape recycling bins.

We applaud you on your recent campaign to encourage BC residents to use reusable bags and take single use bags to depots for recycling. We believe that there are opportunities for joint messaging with our regional district to reduce the use of single use items and would like to discuss this further.

Thank you for considering our input on your revised stewardship plan.

Yours truly,



Tom Watkins
Manager, Policy & Planning
Environmental Resource Management

cc: Teresa Conner, PPP File Lead, Ministry of Environment (Teresa.Conner@gov.bc.ca)



From: Sue Maxwell | susanmaxwell@shaw.ca

Thank you for the opportunity to comment. The revisions are good and help to address some previous concerns.

I am excited to see the broadened scope of materials, the improved targets and the fact that they are by material type and will increase over time and the improved reporting.

Some aspects that could be improved are:

1. There should be targets for reduction of some single-use plastic items (bags, straws, plastic-lined coffee cups, styrofoam cups, styrofoam plates, etc.) as well as reporting on this.
2. There should be targets for reduction of packaging overall, particularly the hard to recycle or most environmentally harmful materials (non-renewables) as well as reporting on this.
3. Targets should increase regardless of whether they have been met and maintained for 2 years or else this creates a disincentive for the program to meet the targets.
4. There should be a target of covering 100% of all multifamily buildings. The program should work with strata associations and ensure that all stratas are informed of the services as well as the recycling collection companies.
5. The program should stick to its commitment to not burn materials for energy or just incineration. This diminishes the public appeal of the program and its reputation. Citizens of Burnaby can get their materials burned already by putting them in the garbage. It is appropriate to collect materials to develop recycling but in the end, materials that are not recyclable, should not be allowed; particularly as alternatives exist.
6. The program should work with regional districts, municipalities and First nations to determine a fair collection network that is based on material and consumption flows and geography instead of solely on population and driving times.
7. The program should be actively engaging producers -the designer, sourcing and marketing arms -to promote better design and recyclability instead of only if requested.
8. Streetscape collection is the responsibility of the program. The program must continue to improve and develop systems to do this rather than just to say it is hard. If liquids are a problem, develop a system to collect those separately. If contamination is an issue, work on community based social marketing programs and possibly hand sorting. Perhaps the expense will drive producers to use refillable containers.
9. Reconsider the exclusion of certain kinds of vacation properties. While the exclusion of care homes make sense as they will be using specific kinds of commercial products and have one set of staff handling waste, in many cases, time-shares function just like homes and the kinds of products/packaging are exactly the same. Likely the fee will have been paid for those products/packaging. In some cases, the building may have a combination of homes and time shares. It is not logical nor fair to exclude these.

Please feel free to contact me should you have any questions.

Sincerely,
Sue Maxwell
9571 Emerald Dr
Whistler, BC
604-734-4046

From:

Doug & Elizabeth Latta | delatta@telus.net
Galiano Island Recycling Resources Society

Thank you for the opportunity to respond in your Feedback Phase II.

We, at Galiano Island Recycling Resources, applaud the move to include more plastics, rigid and other, in your future collection. Although we think that following Vancouver's ban on single use plastic items, taking place this fall, is probably the better way to stem some of this plastic to garbage scenario, than the more labour and energy intensive solution of waste to energy, at this point. We realize, however, that this must be a city initiated programme at this point, until the Ministry of the Environment can proceed further to deal with this plastic tsunami.

We are disheartened, however by your emphasis on the end product of recycling, rather than the process. Good process leads to acceptable, non contaminated recyclable product, such as the material which comes from smaller depots like ours. We are unable to sustain such an excellent end product, however, without the assistance of the CRD. The funding you have designated for us falls far short of what we need. Even with the top up of the CRD, we have many dedicated volunteers who are trained to help the public with regard to sorting and dealing with material as it comes in, particularly in the summer tourist season.

Your decision to add Category 9 to the recycling stream was applauded by our community but the person hours it takes to make sure the public gets it right and does not mix it with the other recoverable plastic is non stop. We would not be able to cope with the influx of summer recycling without volunteer help. We also have a voluntary membership fee to help defray costs. Infrastructure does not come cheaply and the depot must have a sufficient number of trained staff to oversee all aspects of the PPP collection, as well as a covered building to protect the product and staff in more inclement weather.

Pushing the producers of packaging to be more responsible has to come in good part from the companies that use that packaging. I note that this will mean a greater fiscal input from your member companies which can and will be passed on to the consumer.

We have repeatedly informed you that your funding is inadequate. Please consider this fact when you are dealing with depot funding and indicate that the true costs of such depots are never published in these seminars and are misleading.

Thank you.

Elizabeth Latta for

Galiano Island Recycling Resources Society.

From:

Kim Harris | kimharris55@gmail.com

Mayne Island Recycling Society

Once again there was no mention of a different funding formula so that small rural depots would receive enough funding to cover their operating costs.

RBC has refused to discuss this during the entire consultation process. Not once has anyone from RBC responded to the multiple comments raised about this issue.

The least RBC can do is stop saying that they are fully funding the PPP program in the province. If municipal governments need to fund rural depots, for them to stay open, RBC is not covering the entire cost of the program.

In our depot, RBC payments cover the cost of rent, utilities and insurance (plus, through GBN, the costs of transportation of materials). There is not enough money to cover any staffing or other depot costs.

Thank you for offering us this opportunity for feedback.

Kim Harris (Mayne Island Recycling Society)

From:

Nancy Gerber, Site Manager
Saturna Community Club Recycling Centre

Feedback Phase II

This statement in your list of accomplishments is not true.

“Only residential packaging and paper product (PPP) program in Canada that is wholly-financed and operated by producers”

Saturna Community Club Recycling Centre can stay in business because we are subsidized financially by extra government funding and volunteers. That funding does not come from producers. At this time we are breaking even with the extra funding. This happens only because over 50 hours per month are worked by volunteers. The fact that remote centres are underfunded has been brought to your attention repeatedly. Please check your facts before printing such statements.

Thank you,

Nancy Gerber

Site Manager

Saturna Community Club Recycling Centre



Sept 6, 2018

Recycle B.C.
230-171 Esplanade West
North Vancouver, BC
V7M 3J9

Via email: Consultation@recyclebc.ca

To Whom It May Concern,

On behalf of the Waste Management Association of British Columbia (WMABC), we are pleased to provide our comments on proposed improvements to enhance the performance of and accessibility to the Recycle B.C. Program Plan (Program). It is timely that Recycle B.C. is conducting its Program review given the dramatic changes to the recycled materials market and the federal-provincial-territorial development of a national zero plastic waste strategy.

By way of background, the WMABC is comprised of over 70 independent private waste services businesses with over 3,000 employees that provide a majority of the waste and recycling services across the province. As an active participant in the waste management services sector in B.C., we have and continue to provide a critical role in the delivery of efficient and cost-effective waste diversion, recycling and disposal services for the municipal and the industrial, commercial and institutional (IC&I) sectors.

As an industry, we are particularly proud of our leadership role in waste diversion across the province. The members of the WMABC have played a pivotal role in enhancing the diversion of materials in both the municipal and IC&I sectors by providing our strengths in logistics and infrastructure to collect and process these materials in an environmentally responsible manner and return them to the economy as secondary resources. We regard these as examples of a sustainable approach to resource reallocation and promotion of a circular economy. For over 30 years, the Association has acted as a conduit and representative voice for its members in connection with the development and promotion of government policies and programs that increase waste diversion and recycling and move towards the development of a circular economy.

Setting the Context

Waste diversion programs including those in the IC&I sector are facing considerable economic and logistical headwinds. One of the most significant challenges has been the surge in plastics and plastic composite products

and packaging into markets and the lack of recyclability of these materials. These plastics are rapidly displacing recyclable paper, metal and glass packaging that have long been the cornerstone of diversion programs and have led to higher contamination rates at recycling facilities. With less value and no viable end markets for these materials, they are being disposed of in landfills and waste to energy facilities or worse, ending up in the environment. This is by no means specific to B.C. as this scenario is occurring right across Canada and the U.S.

One of the failings in the recyclability of plastics has been the disconnect between the materials collected and lack of pull or end markets for these post-consumer plastic materials. If Recycle B.C. is to meet the proposed performance metrics outlined in Canada's Plastic Charter, it will need to address this disconnect.

While waste services providers do not have the ability to influence the design of products and packaging, they understand the environmental and economic challenges and opportunities associated with waste diversion and processing. To serve their customers, our members must plan, educate and operate the collection and management of the materials that producers sell into the market. The WMABC proposes several public policy measures that would help with the enhancement of the performance and accessibility of the Recycle B.C. Program.

Improving the Performance of the Program

The WMABC is supportive of Recycle B.C.'s four principles:

- focus on outcomes, not process;
- provide economic incentives and set simple rules;
- foster interaction, collaboration and competition to drive innovation, and;
- set the stage for evolution through continuous improvement.

The Association believes this approach will be paramount for Program's future success.

To enhance the performance of the Program, the WMABC believes that provincial and municipal governments have the opportunity through their existing procurement programs to stimulate the development of end markets and create pull for these plastics as part of the development of a circular economy. The WMABC has members that could easily provide post-consumer recycled materials to develop markets for new local products and services.

However, one of the critical issues that often arises when governments attempt to stimulate new markets is to support specific approaches and technologies through legislation, regulation and/or public policy. Not only is it inappropriate for governments to try to predict the needs of future markets, but when they do, they often have a less-than stellar record in guessing what the market will need in coming years.

The WMABC would caution the province and municipalities not to focus on public policies that pick “winners” and conversely “losers” but instead create a public policy environment that encourages and incents a broad range of waste service companies to adapt as well as attract new investment and technologies to respond to evolving market needs. These policies and regulations should not be prescriptive and/or focus on a specific type of technology, material or service but rather focus on outcomes while ensuring environmental protections are in place.

To this end, the WMABC recommends that the provincial government and municipalities commit to conduct a comprehensive review of existing waste management policies and programs to create a public policy environment that will create pull for plastics as well as other materials and address disconnections along the chain of custody of these materials. This will ensure that any new initiatives enhance the performance of the Program as well as facilitate investment in the development of a circular economy. However, for a circular economy to take hold in B.C., there are two key factors that influence investment – an open and competitive market and regulatory certainty.

Open and competitive markets allow for the development of dense collection networks which in turn drives higher productivity while maximizing internalization opportunities. This environment helps de-risk investments in new recycling infrastructure and manufacturing facilities. Given the patchwork of regulations between the regional districts across the province, this fragmented approach can destabilize the materials market and the results can be counterproductive. Investment capital flows more readily to those jurisdictions where it can be most effectively utilized and where the returns are the greatest.

With respect to regulatory certainty, the WMABC believes in regulation. However, it must be developed in conjunction with the private sector that establishes clearly-defined policy objectives that protects the environment but also creates systematic incentives that allow companies to invest in new and innovative technologies and approaches. Approval processes and permitting should be outcome focused and based on sound science and economics that encourage solution providers and the market to develop innovative ways to meet these standards.

The materials that the B.C. waste services industry collect, and process are commodities within a competitive global economy. If our industry is to serve the needs of our customers such as Recycle B.C. and grow and thrive, there needs to be a regulatory framework that is consistent, effective and fast-moving. This will not only encourage companies to invest in new and innovative technologies and approaches but also incite those companies to use these feedstocks to create value-added products thus lowering costs for brand owners, municipalities and taxpayers.

Enhancing the Accessibility of the Program

It should be noted that many jurisdictions with producer responsibility programs are moving from a monopolistic to a competitive marketplace with multiple service providers and programs. This not only

encourages investment and innovation in new capacity and diversion technologies but also reduces costs to brand owners, businesses and taxpayers. The WMABC would suggest that the 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.

Another aspect of regulatory certainly is competition between the public and private waste services sectors which can exacerbate the disconnection along the materials chain of custody.

In some jurisdictions, municipalities may provide waste services in direct competition with the private sector. As an example, a municipality or regional district may own and/or operate transfer stations, materials recycling facilities, disposal facilities (landfills and/or waste-to-energy) while simultaneously being the regulator of private sector services in the community in terms of licensing waste processing facilities, charging various fees disposal and fines for non-compliance as well as arbitrating disputes and complaints from the private waste services sector.

In these instances, depending on the degree of services provided, a municipality or regional district may create a monopsony whereby it is the sole buyer of waste materials that restricts competition in the diversion and/or disposing of waste. This also places smaller private waste services providers at a competitive disadvantage with larger companies, which could push smaller companies out of the market resulting in business failures and job losses. Under Canada's Competition Act, these activities by the public sector could be considered an abuse of power.

Summary

The WMABC believes the Recycle B.C. Program requires a collaborative effort from all stakeholders along the material chain of custody. We believe that the some of the environmental and economic issues around the management of materials issues outlined in the Program review have been in part due to a disconnect between the activities of several key stakeholders. Therefore, the WMABC would recommend:

- any future activities within the Program must include all stakeholders involved in the chain of custody of approved materials.
- any discussion of the structure or restructure of provincial and municipal waste diversion and management policies must include outcome-based policies and regulations in an open and competitive market to encourage and incent private sector investment that will create new and innovative diversion and recycling facilities, facilitate a circular economy and in turn reduce costs for brand owners, local governments and taxpayers.
- that Recycle B.C. advocate for the establishment of definitions and performance standards to ensure claims of recyclability or compostable products entering the market so as not to inundate local markets with

materials that municipal and industry collection systems cannot process and result in increased disposal costs.

- any targeted action on reducing plastic products and packaging including bans, fees or recycled content requirements must undergo a full economic analysis before approval and implementation so as not to cause unintended consequences.
- governments at all three levels should commit to procurement programs to stimulate the development of end markets and create pull for these materials which in turn can facilitate the development of a circular economy.
- that the 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.

We would respectively recommend that the above points and issues raised in the preceding sections be incorporated into the ongoing enhancement of the Program to sustainably increase the diversion of materials from the waste stream and develop end markets for those materials.

The WMABC stands ready and willing to work with Recycle B.C., the province and local governments to address these issues. For further information, please contact Lori Bryan, Executive Director for the WMABC at info@wmabc.com

Sincerely,

Noel Massey
President

- c. Hon. Minister George Heyman, Minister of Environment
Mark Zacharias, Deputy Minister, B.C. Ministry of Environment
Lori Bryan, Executive Director, WMABC

Good Afternoon,

Indigenous Services Canada is making significant investments to improve solid waste management for First Nation communities in BC. As part of our program we are assisting First Nations develop holistic waste management solutions including:

- Waste and recycling collection
- Organics diversion
- Infrastructure upgrades
- Awareness and training
- Agreements for waste and recycling transfer services
- Operations and maintenance

First Nations have worked hard to develop relationships with neighbouring communities, regional districts, services providers and product stewards, to integrate within the provincial solid waste management systems. Many First Nations are quickly becoming provincial leaders in zero waste initiatives.

A barrier to the continued success of the First Nation zero waste initiatives is the ability for First Nations to be accepted into the Recycle BC Packaging and Paper Project Extended Producer Responsibility Program or have access to facilities that are in the program.

In order to remove some of these barriers, I have some suggestions:

- 1) Consider revising the target number of First Nations that will be considered eligible for a financial offer and service agreement. The existing annual target of two will take approximately 100 years to include all First Nations in BC within the program.
- 2) Allow existing Recycle BC collectors to expand service to First Nations within their vicinity for the collection of household PPP
- 3) Allow existing Recycle BC depots to allow access to First Nations in their vicinity for the drop off of household PPP
- 4) Ensure that negotiations with one First Nation for entry into the Recycle BC program does not impact negotiations with other First Nations that have submitted applications
- 5) Include First Nation indicators within the annual reports such as: number of First Nations with depot; number of First Nations with curbside collection; number of First Nations with access to a non-First Nation depot, etc.

I hope you will consider these comments or other similar measures that will allow increased First Nation participation within the Recycle BC.

I look forward to working together to ensure First Nation communities have adequate access to your program.

Thank you,

Shauna Sturgeon, P.Eng.

Project Engineer, Specialist Services
Community Infrastructure Directorate
Indigenous Services Canada
600-1138 Melville Street
Vancouver, BC, V6E 4S3
Phone: 604-340-3256
Shauna.Sturgeon@Canada.ca



IZWTAG Indigenous Zero Waste Technical Advisory Group

September 6, 2018

Recycle BC
230-171 Esplanade West
North Vancouver, BC
V7M 3J9

Via email: consultation@recyclebc.ca

Dear Sir or Madam:

Re: Consultation of Recycle BC Revised Program Plan – Phase II

The Indigenous Zero Waste Technical Advisory Group (IZWTAG) respectfully submits this letter in response to Recycle BC's proposed Packaging and Paper Product (PPP) Extended Producer Responsibility Plan (revised July 2018).

Summary

We appreciate the efforts to address the PPP recycling service gaps for First Nations communities (as stated in the proposed program plan, there are now 11 First Nations registered as Recycle BC collectors, albeit out of a total of 201 B.C. First Nations). We strongly recommend the use of additional service expansion approaches to increase the rate of First Nations inclusion in the program. We have outlined some examples that we believe will address the circumstances and opportunities particular to First Nations, build upon existing relationships and infrastructure, and fit the product stewardship goals in the Recycling Regulation.

We wish to recognize the efforts of Recycle BC and other product stewards to engage with First Nations through the hiring of a First Nations Field Services Specialist. This significant investment could be leveraged to yield measurable outcomes for First Nations in addition to the current outreach and liaison roles. Together with the expanded access and interim staged registration proposed in this letter, the First Nations Field Specialist could be an effective facilitator to remove barriers and accelerate new agreements for First Nations to access the Recycle BC program.

We also recommend additional performance measures to aid in monitoring progress in the endeavour to close the gap between the number of First Nation communities with access to PPP recycling and the rest of the province. We believe annual reporting on these measures together with a collaborative working forum with the IZWTAG and the provincial ministries responsible will be productive and lead to quantifiable outcomes. We urge Recycle BC to build on overall successes so far with the first PPP program plan and follow through in the upcoming plan with equal or better PPP product stewardship outcomes for First Nations in B.C.



IZWTAG Indigenous Zero Waste Technical Advisory Group

Unless the proposed program plan is revised to include effective and measurable components to increase the rate of First Nations inclusion, as outlined in this letter or directly comparable to the recommendations in this letter, IZWTAG will regrettably not be in support of the proposed program plan as currently written.

Introduction

The IZWTAG was formed to provide Indigenous-led technical and advisory guidance to:

- BC First Nations for developing and sustaining up-to-date solid waste management systems that meet community needs and local conditions, work towards zero waste, and are compatible with regional and provincial requirements;
- Industry and government partners, including solid waste associations, product stewards, service providers, regional, provincial and federal departments, to advance the interests of BC First Nations in managing and funding solid waste programs;
- Build hands-on capacity among BC First Nations to operate and sustain solid waste management systems, including community education, training, technical support, best practice resources/updates and service provision.

The IZWTAG consider PPP recycling to be a significant component enabling First Nations to achieve their zero waste aspirations, and therefore, timely access to the Recycle BC program to be critical.

Gaps and Opportunities

First Nations in BC comprise citizens and voters, and obtain products and services in the same manner as their neighbors – and like their neighbors, require access to product stewardship recycling collection and depot services in order to meet provincial and regional requirements for waste diversion, and comply with landfill bans. Without access, First Nations are faced with commercial rates for recycling and/or increased landfill fees and penalties as Regional Districts continue to implement waste diversion bylaws. We note, however, that Regional Districts have been and continue to be supportive partners to First Nations, enabling improved waste management for on-reserve communities. Given that regional districts are the primary jurisdictions planning and implementing on-the-ground waste management in B.C., this partnership foundation offers an excellent opportunity to extend Recycle BC program services to First Nations.

While First Nations traditions honour and respect taking care of the environment, historical circumstances, population size and geographic situation have not always fostered the creation of comprehensive community waste management systems at the same time frame as the rest of the province. This “time lag” partly accounts for the awareness gap among First Nations when the initial PPP program plan was launched. The situation is rapidly changing with emerging federal investment programs aimed at establishing up-to-date waste management systems to address the needs of remote communities, but also in response to the requirements of regional and local waste bylaws. We recognize



too that there are First Nations in B.C. that have improved community waste management outside of the federal program.

At the present time, one of the noticeable gaps is the difference between the number of First Nations establishing improved waste management systems within the federal program, and the number of First Nations with Recycle BC agreements (60 vs. 11).

From the perspective of First Nations, another reason for the low participation is a reluctance to sign agreements with significant penalty clauses for recycling contamination and the potential financial liability. This caution can be a constraint, but also a potential opportunity to instil quality control training and practices through a staged approach that combines building skill and confidence for program participation. Specifically, for the mutual benefit of Recycle BC and First Nations, program inclusion could start with an interim step that includes a quality control component supported by training and audits, and upon consistent achievement of low contamination rates result in full or final registration.

Another barrier to receiving recycling product stewardship services is the current limited entry model, whereby a First Nation must queue on an unofficial wait-list to be assessed for potential registration. This may have been a procedure that suited the limited opportunities within the initial PPP program plan life, and dovetails with the previously unofficial objective to offer service agreements to two First Nations per year. We respectfully disagree with continuing this approach in the proposed program plan revision due to its obvious limitations, but also stress that the language of the proposed revised program plan objective (quoted below) falls short of actually achieving the limited outcome proposed:

“Provide financial offer and services agreement to two First Nation Recycling programs each year while working to maintain the continuity of the existing First Nations collection programs within its network”

We note again that this is not an outcome-based approach (which goes against a Recycle BC principle-see page 8 of the proposed plan revision) because only an offer is being made and not the completion of a new recycling agreement. Recycle BC could instead depart from the constraints of the previous program plan, commit to a fresh approach and offer agreements to multiple First Nations, complete agreements with multiple First Nations and have a more ambitious plan and goal that would provide and extend PPP product stewardship agreements to every B.C. First Nation within the life of the revised program plan. Theoretically, if the current proposed goal is continued through the life of the revised program plan and beyond, a rate of actually including two per year will mean it could potentially take 95 years to include all First Nations. Clearly, a different approach is required, one that results in significantly better outcomes, by addressing the barriers and constraints for all parties involved, and that takes the best advantage of available opportunities.



Proposed Alternative Options to Accelerate First Nations Access to PPP Product Stewardship Services

The diversity of B.C. First Nations, in particular with regard to the geographical situation and transport access, provides challenges but also opportunities to expand recycling services. Roughly **one-third** of all B.C. First Nations are located adjacent to or nearby other local communities with curbside recycling. One example is the Tla-o-qui-aht community of Esowista on the Tofino peninsula, who are located between the communities of Tofino and Ucluelet; Esowista residents are keen to participate in the local curbside recycling service that their neighbors receive, and in fact share their drinking water and wastewater systems, and are part of the same Regional District waste management regime. There are similar examples in the Lower Mainland, Vancouver Island, and the Southern Interior where existing local and municipal curbside programs surround First Nations and could likely be expanded to include First Nations if access to the Recycle BC system for recyclables could be granted by Recycle BC.

Just over 40% of B.C. First Nations have reliable road access to regional or Recycle BC depots and would be potential candidates for curbside collection and direct haul to one of these depots, and/or to establish as interim satellite depots. An example would be the Gitksan First Nations along Highway 37 near Hazelton, who are implementing recycling required by the latest Regional District waste bylaw, and actively training operators through SWANA and educating residents with the help of the regional district.

Finally, another one-quarter of B.C. First Nations are either located on islands or in remote locations with difficult terrain or road access. The majority of these communities are already part of the federal program and a few are already registered Recycle BC collectors (e.g. Heiltsuk at Bella Bella and Gitxaala at Kitkatla). These remote communities are receiving federal investments to upgrade the waste management facilities and represent a timely opportunity for Recycle BC to extend depot services, potentially using the quality control mechanism mentioned above.

The above locational understanding of B.C. First Nations helps to highlight potential avenues for efficient and timely extension of PPP product stewardship services, that could combine proximity or distance to existing and potential service networks and partners. We note that the current proposed program plan revision includes the following statement which alludes to a similar approach:

“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” – From section 4.3.9.

We respectfully recommend moving to an outcome-based statement using this principle of service extension to accelerate provision of PPP curbside pick-up and/or depot services to First Nations.

In an effort to provide constructive options for moving forward, the following is offered as a potential Recycle BC program plan component for First Nations inclusion:



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PROVIDE FIRST NATIONS COMMUNITIES WITH ACCESS TO CURBSIDE AND DEPOT RECYCLING SYSTEMS FOR HOUSEHOLD PPP

First Nations will have the option of entering the Recycle BC program in stages, beginning with an interim registration for either curbside or depot or satellite depot services coupled with a quality control component supported by training and audits. The interim registration would allow access for recycling materials to enter the Recycle BC system through an existing curbside program or depot network. Upon consistent achievement of the Recycle BC quality and contamination thresholds, the First Nation is eligible for full registration. Penalty clauses will be in abeyance for the interim period or 3 years, whichever is earlier. Financial incentives/subsidies during the interim period may be pro-rated to offset the training and audit cost.

Recycle BC will permit collectors to extend curbside or depot services to First Nations in their vicinity on the same basis as their existing agreement. Where a local collector is unwilling or unable to extend service to First Nations, Recycle BC will allow the First Nation or another collector to provide the service on the same terms within 12 months of receiving a request for interim access.

Effective and Measurable Components

IZWTAG proposes the following be added to the plan performance measures and included in the annual reporting requirements as First Nation indicators:

- **Awareness Indicator** - Number of First Nations of the total of 201 for which their preferred PPP recycling access has been identified through outreach and liaison (e.g. interim curbside, interim depot, extended municipal curbside, independent curbside with Recycle BC agreement, Recycle BC Depot agreement).
- **Accessibility Indicators** - Number of First Nations with community interim or complete Recycle BC access for PPP by Regional District (i.e. PPP collected by the community is being accepted by the Recycle BC program). Number of First Nations with completed agreements. Number of First Nations offered agreements. Number of First Nations expressing interest in obtaining an agreement.
- **Operational Efficiency Indicator** - Number of First Nations where PPP curbside program is equivalent to the adjacent/surrounding municipality's curbside program of the approximately 70 First Nations with adjacent/surrounding curbside programs. Of the 45 First Nations located greater than 100km from a Recycle BC depot, the number that have a depot agreement with Recycle BC.

Setting up for success

We respectfully submit this letter as input to Recycle BC's proposed Packaging and Paper Product Extended Producer Responsibility Plan (revised July 2018), and invite Recycle BC and provincial



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ministries responsible to dialogue further with us on detailed aspects of the proposals, such as the quality control component. We recognize the major challenge (and opportunity) to provide service to the remainder 190 or so B.C. First Nations, and are willing to participate in a collaborative ongoing forum to implement, improve and monitor PPP recycling service extension.

We note that at the end of this proposed program plan revision period, ten years will have elapsed since PPP product stewardship came into effect in B.C. As such, unless the proposed program plan is further revised to include effective and measurable components to increase the rate of First Nations access, as outlined in this letter or directly comparable to the recommendations in this letter, IZWTAG will regrettably not be in support of the proposed program plan (revised July 2018) as currently written.

We thank you for the attention and the opportunity to provide input.

Respectfully,

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