Preventing Waste in British Columbia:

Non-Residential Packaging & Paper Products

Discussion Paper

BRITISH COLUMBIA

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Contents

Purpose of discussion paper

British Columbia has been taking actions to prevent plastic waste, as outlined in the CleanBC Plastics Action Plan. This includes actions under the 2021-2026 Extended Producer Responsibility 5-year Action Plan and the commitment to identify a policy approach for non-residential packaging and paper products in 2025.

Working towards identifying policy approaches for non-residential packaging, the ministry is seeking your input on a series of desired outcomes and potential policy approaches. Given the complexity of non-residential packaging waste, it is anticipated that a combination of actions and a phased approach will be required.

This discussion paper provides background on solid waste in British Columbia, including what it is made of and where it is collected, focusing on the non-residential sector, also referred to as the industrial, commercial, and institutional (ICI) sector. This paper discusses the challenges of managing municipal solid waste in B.C. as well as identifying opportunities to prevent waste from non-residential packaging. It is designed to promote discussion and aims to gain insight from interested parties to help inform effective and efficient solutions.

The Ministry of Environment and Climate Change Strategy (the ministry) invites you to contribute your knowledge and ideas to inform the development of policy approaches that will improve the prevention and recycling of non-residential (ICI) packaging waste in communities across B.C.

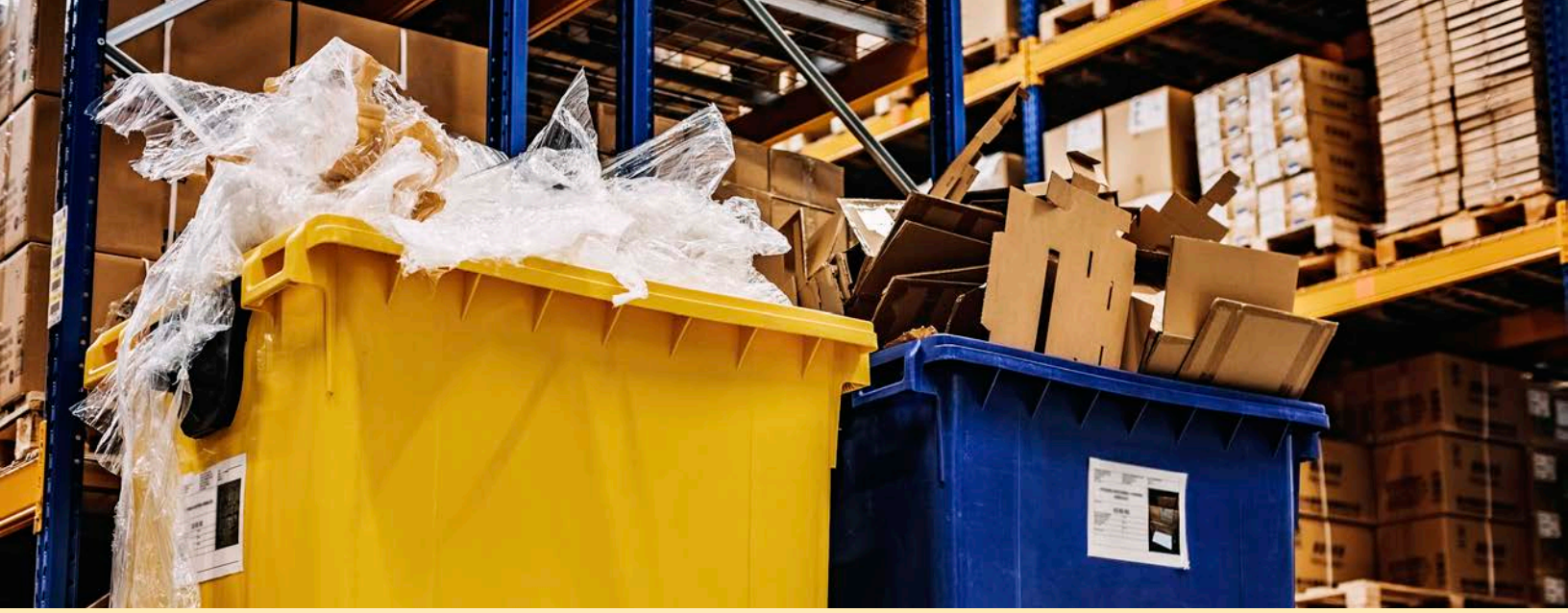
We want to hear your thoughts on:

- Questions posed in the discussion sections;
- Issues or concerns you think we should be aware of;
- Ideas or solutions for non-residential packaging you or your organization wishes to share;
- Where efforts should be prioritized; and
- Anything you wish to share on the topic of how to improve the Province's approach to non-residential packaging and paper products.

Why focus on non-residential packaging?

In British Columbia we dispose of over 2.5 million tonnes of solid waste from our homes and businesses in landfills or through incineration each year. This is over 500 kg of waste disposed per person. An estimated one-third of this waste is packaging and packaging-like materials that can be prevented through waste reduction and reuse initiatives or diverted through recycling programs. While over 99% of British Columbians have access to recycling at home through curbside blue boxes, multi-family building recycling programs or depot services, recycling and waste prevention outside of the home at locations such as offices, retail stores, restaurants, warehouses, manufacturing facilities, institutions and schools is not as consistent.

Under the CleanBC Plastics Action Plan, British Columbia has taken actions to prevent plastic waste, including reducing the use of hard-to-recycle plastics, and expanding B.C.'s reuse services and recycling programs. However, more actions are needed to prevent packaging waste from polluting our environment, filling up our landfills and contributing to litter and greenhouse gas emissions. Action is needed to ensure that there are options to reuse and recycle materials outside the home in communities across the province.



Key Definitions

Industrial, Commercial, and Institutional (ICI) Waste | waste generated by all non-residential sources, and that is excluded from the residential waste stream, namely institutional waste, which is generated by institutional facilities such as schools, hospitals, government facilities, assisted living/long-term care homes, or universities; commercial waste, which is generated by commercial operations such as shopping centers, offices, businesses, and hotels; and (light) industrial waste, which is generated by manufacturing and primary and secondary industries, and is managed off-site from the manufacturing operation.

Non-residential packaging and paper products | Packaging and paper generated and/or disposed by the ICI sector, including construction businesses.

Packaging and paper products (PPP): Packaging (*Environmental Management Act* (EMA) definition) | a material, substance or object that is used to protect, contain, or transport a product, or attached to a commodity or product or its container for the purpose of marketing or communicating information about the product. Includes packaging-like products such as food containers, wraps, bags, boxes, and items supplied to consumers for the purpose of protecting, containing or transporting products.

Paper Products | paper that is not packaging but is printed with text or graphics as a medium for communicating information. Does not include paper products that, due to their anticipated use, could become unsanitary or unsafe to recycle, or bound reference, literary or textbooks.

Municipal solid waste (MSW) (EMA definition) | Refuse that originates from residential, commercial, institutional, demolition, land clearing and construction sites.

Disposal | the introduction of waste into the environment through any discharge. For clarity, disposal includes both landfilling and incineration of waste.

The challenge of waste in British Columbia

In B.C. over half of the municipal solid waste disposed is made up of highly recyclable or compostable material including plastics, paper, metal, glass, and compostable organics (Figure 1). Other types of waste such as building materials, wood, textiles, and other materials comprise the remaining portions. Municipal solid waste comes from many sources including homes, businesses, schools, shopping malls and work sites, and through construction and demolition activities. These waste sources are often grouped into three main categories: residential; non-residential, also referred to as industrial, commercial, and institutional (ICI); and construction, renovation, and demolition.

Municipal solid waste, including packaging and plastic, poses a challenge in B.C. as it fills up our landfills, contributes to litter and pollution and is increasingly more expensive to manage. Waste management, including disposal, has significant economic costs that are paid for by local governments, First Nations, businesses, and taxpayers to ensure waste is managed appropriately. While waste is comprised of many types of materials, an estimated one-third of B.C.'s waste is made up of plastics, paper, and other packaging-like materials, much of which could be prevented through reuse or recycling.

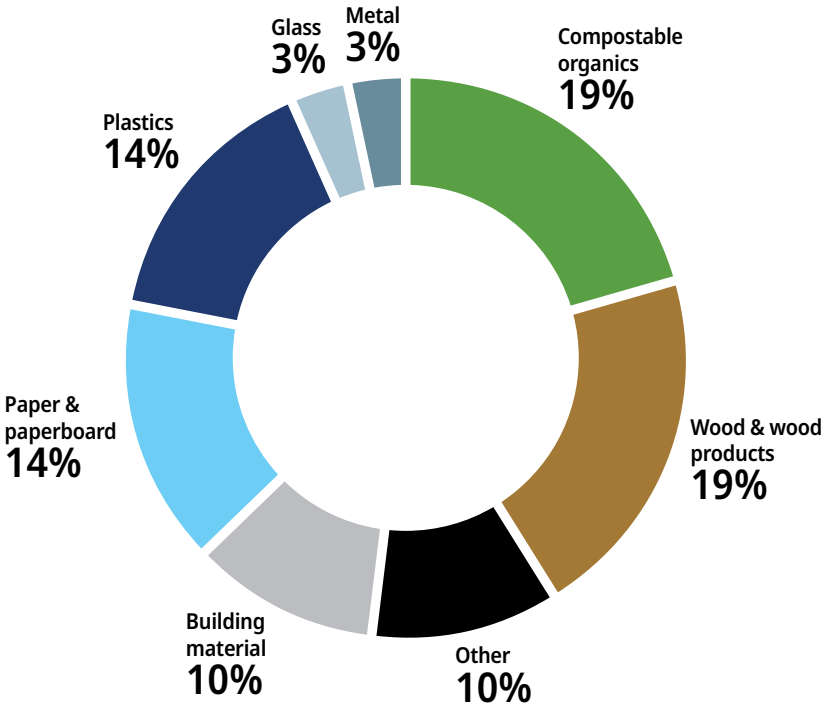


Figure 1. Waste by type – Over 50% of our waste disposed is from recyclable or compostable materials: organics (e.g., food scraps), plastics, paper, metal, and glass).

Waste prevention efforts in B.C. are increasingly important as the largest landfills in the province, which accept more than half of B.C.'s waste each year, have an average remaining lifespan of only fifteen years before further expansion is necessary. The costs of landfilling and treating waste may increase significantly unless the amount of waste created in the province is reduced. Landfills also contribute to pollution and climate change - emissions from B.C. landfills are estimated to be 2 million tonnes of CO_2e each year; the same as adding 435,000 cars to our roads. Limited landfill capacity, the increase in waste and the resulting increase in economic and environmental costs show the need for new actions to reduce and prevent waste.

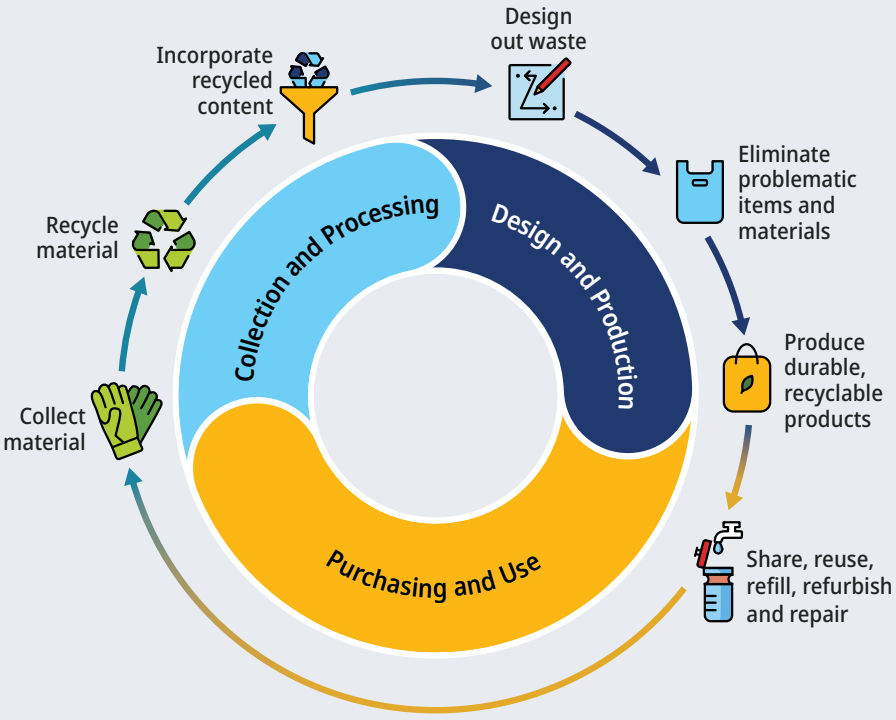
Currently, there are a variety of regulations and requirements in B.C. for residential and non-residential waste. First Nations, local governments and the provincial government all have important roles to ensure municipal solid waste is managed safely with waste prevention and recycling programs prioritized. To reduce waste in B.C., it is necessary to ensure that communities throughout the province have access to affordable waste prevention and recycling options, stopping waste before it starts and ensuring the value of the materials and goods we produce, and use, are brought back into the economy and kept out of the landfill (see inset on Circular Economy).

What is a Circular Economy?

A circular economy aims to eliminate waste, pollution, and carbon emissions by using materials for as long as possible. Through circular design, products can easily be repaired, reused, or recycled. A circular economy shifts from the linear "take, make, waste" system where natural resources are used to make items that are disposed of when no longer needed. A circular economy approach designs out waste from the process, keeping products and materials in use for as long as possible through strategies such as sharing, leasing, reusing, repairing, refurbishing, and recycling existing materials and products back into manufacturing processes.

A circular economy offers environmental benefits by reducing our reliance on a constant flow of new raw materials and reducing litter and the volume of material going to landfill in both urban and remote communities. Reducing our consumption and generation of waste is crucial to achieving these goals, ensuring materials are not lost and are instead valued as a material that is important to our economy.

As an economic driver for business, innovation, and materials management, adopting circular thinking can enable economic results while reducing the impacts on our climate and environment. Plastics and packaging are one example of material being moved into a circular economy in B.C., eliminating "waste" and instead using plastics as a valuable resource providing environmental, social, and economic benefits.



CleanBC Plastics Action Fund recipient Vitatek Solutions is reducing non-residential plastic packaging by providing refills for commercial cleaning supplies.

Where we are now

British Columbia is already taking steps to prevent waste, including plastics, through regulations, funding programs, local government actions and business-led initiatives.

As part of the CleanBC Plastics Action Plan, the provincial Single-use and Plastic Waste Prevention Regulation (SUPWPR) was recently enacted to prevent plastic and packaging waste. The SUPWPR provides a framework to phase out certain hard-to-recycle single-use and plastic packaging and items, such as plastic cutlery and shopping bags, many of which are from non-residential sources. This regulation reduces the impacts of hard-to-recycle plastics and single-use items, and supports British Columbians to switch towards reusable, recyclable and compostable items.

B.C.'s Regulatory Framework for Waste Management

The ***Environmental Management Act*** governs the management of waste in British Columbia. The act provides the authority for managing waste, while protecting our health and the environment. Specifically, the act enables the regulation and management of packaging, product containers, single-use products or any other materials or substances from all sources including the ICI sector.

Through **Solid Waste Management Planning** regional districts are required to develop solid waste management plans (SWMPs) with strategies to manage waste within their district including waste prevention programs, recycling, composting, and disposal following the pollution prevention hierarchy. SWMPs include waste diversion goals and local targets.

The **Single-use and Plastic Waste Prevention Regulation (SUPWPR)** bans single-use plastic shopping bags and takeout containers made from problematic plastics and restricts other single-use items to be available only by-request.

The **Recycling Regulation** is the basis of the provincial Extended Producer Responsibility (EPR) programs for a wide range of products, including packaging and containers.

The **Spheres of Concurrent Jurisdiction Regulation – Environment and Wildlife Regulation under the *Community Charter*** provides provincial consistency for municipalities to address the issue of waste, including single-use and plastic items, in their communities, enabling municipalities to create waste reduction bylaws relevant to their unique circumstances.

Another regulatory tool under the *Environmental Management Act* (EMA), the Recycling Regulation, Extended Producer Responsibility (EPR) systems require producers, such as manufacturers, distributors, and retailers to take responsibility for the life cycle of the products they sell, including collection, such as curbside collection or collection depots; and recycling the packaging and products collected.

B.C. has a wide range of packaging and products covered by EPR programs, resulting in a robust and resilient recycling economy. This includes EPR for plastics and packaging collected from the residential sector in curbside blue boxes, multi-family building recycling programs or depot services. In B.C., we have a North American leading EPR program for residential packaging and paper products collected from our homes, where over 95% of plastics collected for recycling through the residential program are processed locally in the province. Other EPR programs in B.C. already accept items from non-residential sources, such as deposit-return beverage containers, and moderate risk waste packaging such as oil or paint containers.

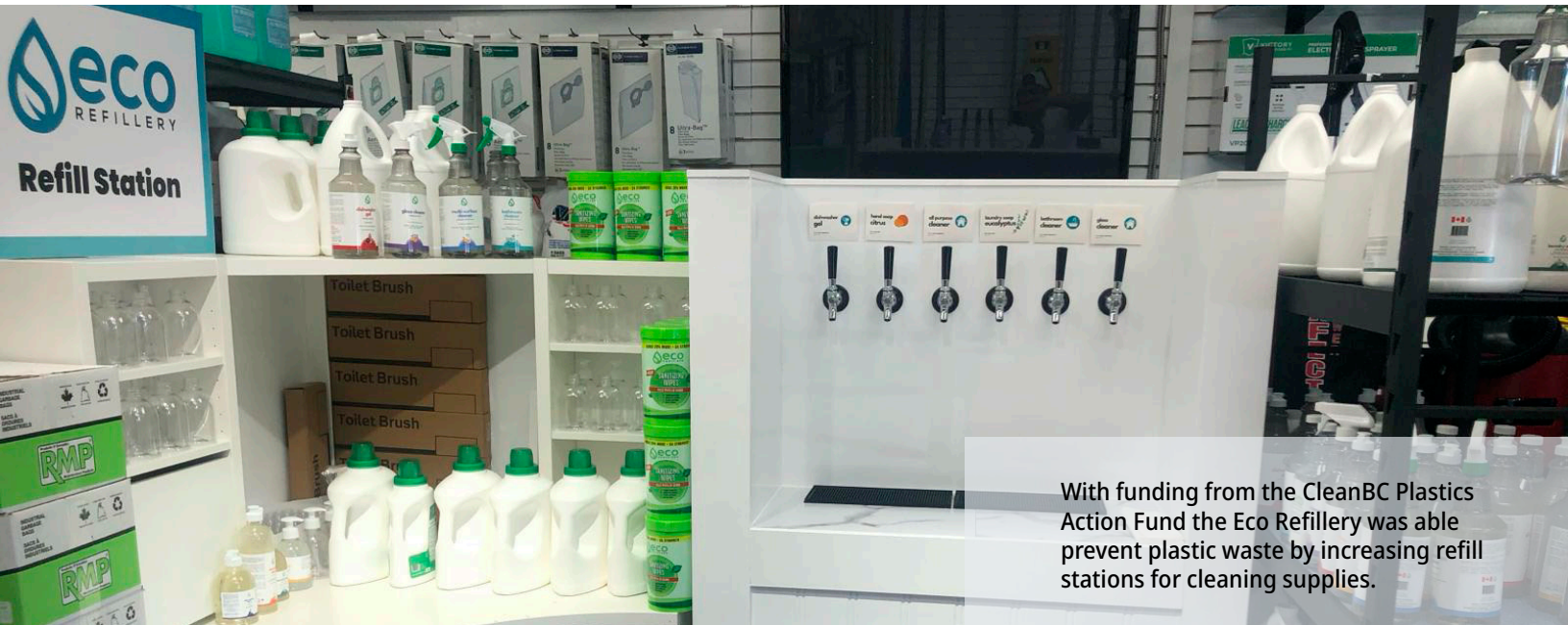
In addition to regulatory requirements, the province has created funding opportunities through the CleanBC Plastics Action Fund and the Clean Coast Clean Waters Initiative (inset). These funding programs support projects that prevent plastics and waste from polluting our environment or entering our landfills. To further reduce materials going to landfill, B.C. is also funding composting facilities and programs to increase the diversion of organic material and support its use as compost.

Provincial Funding Programs to Reduce Waste and Pollution

Plastics | Through the CleanBC Plastics Action Fund, B.C. has supported over 30 projects led by businesses and First Nations to reduce plastic waste, implementing reuse solutions as well as using recycled plastics to produce new products or materials.

Ocean Plastics | The Clean Coast Clean Waters Initiative has removed 1,500 tonnes of material from B.C.'s coastlines, ensuring that most of the collected materials are recycled or reused again.

Organics | B.C. is working to increase diversion of organic material, by supporting organics collection and processing infrastructure in B.C. communities. To date, 45 new organics projects have been funded through the Organics Infrastructure Program (OIP) and Organics Infrastructure and Collection Program (OICP) across the province.



With funding from the CleanBC Plastics Action Fund the Eco Refillery was able prevent plastic waste by increasing refill stations for cleaning supplies.

At the local level, regional districts develop solid waste management plans (SWMP) that are submitted to the ministry for approval, with strategies for preventing and managing municipal solid waste, including recyclable materials, within their region. Within the solid waste management plans, regional districts set targets to decrease the amount of solid waste disposed and identify programs that will be implemented to reduce and manage waste within their jurisdictions, including local collection facilities, landfill or disposal bans, data collection requirements, bylaws, and regulations to increase reuse and waste prevention.

Some municipal governments have also used local bylaws to prevent waste, enabled by the Spheres of Concurrent Jurisdiction – Environment and Wildlife Regulation under the *Community Charter*. These local bylaws have included actions such as bans on the sale of certain hard-to-recycle materials or products, for example plastic bags and foam take-out containers.

There are also examples of B.C. businesses and institutions taking steps to prevent plastic and packaging waste. This includes actions of businesses to meet environmental, social and governance (ESG) goals to prevent waste and reduce the environmental and social impacts on communities. Actions include material sorting to keep recyclables from entering landfills, promoting plastic and packaging recycling by setting reduction targets, reporting on plastic and waste generation, or preventing packaging by switching to reusable food service ware.

The opportunity to prevent non-residential packaging waste

In B.C., a third of our waste being disposed is comprised of recyclable materials such as plastic, paper, and other packaging-like materials with up to half of packaging and paper in the non-residential sector being sent to landfills. Non-residential packaging, including plastics and paper, provides an opportunity to increase reuse and recycling as many of the products and materials are similar or identical to residential packaging.

As a result of B.C.'s residential EPR program for packaging and paper products (PPP), which came into effect in 2014, B.C. has an established network of recyclers and processors enabling the majority of collected packaging to be processed within the Pacific Northwest. This robust system provides a significant opportunity to build upon existing reuse and recycling infrastructure to create consistency and prevent both residential and non-residential packaging, plastics, and paper from entering our landfills.

The Pollution Prevention Hierarchy

The 5 R pollution prevention hierarchy is a useful planning tool for moving towards zero waste. Once all achievable opportunities at a higher level have been taken, only then should the next level be looked at. For example, opportunities for recycling should be explored only after all opportunities for reduction and reuse of materials have been exhausted.

The pollution prevention hierarchy supports a circular economy approach which can create jobs, promote innovation, and help to protect people and the environment.

As businesses and governments work to reduce waste and plastic pollution, there is increasing demand for recycled content to be used in new products, including recycled plastics, metal, glass, paper, and cardboard. With increased government and corporate recognition of recycled materials, and commitments to increase recycled content, the non-residential sector provides an opportunity to improve the prevention and recycling of plastics, paper, and other packaging materials.

Reducing, reusing, and recycling waste, following the pollution prevention hierarchy (inset on previous page), can provide many benefits to British Columbia's economy and communities. Reuse and recycling systems can reduce pollution, including greenhouse gas emissions, as well as create jobs, up to five times more than sending materials to landfills. In addition, a provincial waste management approach can provide transparency and accountability by establishing targets and reporting requirements. This in turn can increase British Columbians' confidence in waste management systems that keep materials out of the landfill and environment and within B.C.'s circular economy.

A closer look at non-residential packaging

The non-residential (ICI) sector is comprised of diverse sources of waste, including light industrial sources such as agriculture, manufacturing and jobsites, businesses such as retail stores, tourism, and restaurants, as well institutions including hospitals, schools, and universities (Figure 2).

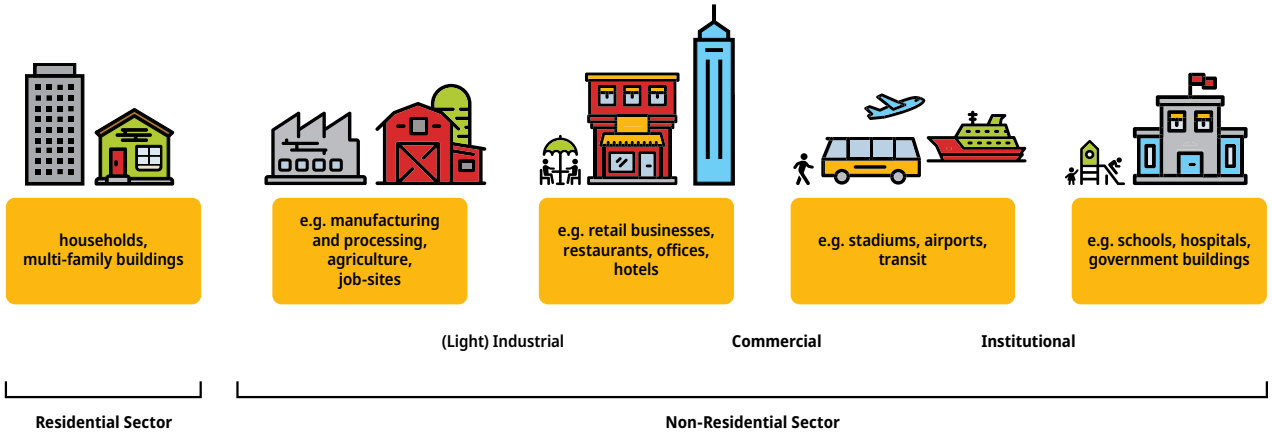


Figure 2. Residential and Non-residential (ICI) sources at a glance

The recent Canada Plastics Pact B.C. ICI Packaging and Paper Products Baseline Report looked at both business waste audits and landfill reporting to present an overview of the types and quantities of packaging, and identified significant data gaps in waste reporting for non-residential packaging. Non-residential packaging is more diverse than residential packaging and consists of both business-to-consumer packaging and business-to-business packaging. Some of these items are similar or identical to those found in the residential packaging waste stream, while other items or materials are specific to business-to-business applications or may be unique to one source, such as agriculture, construction, or medical facilities.

Table 1: Description of non-residential sources of packaging and packaging-like products

Material	Examples	Sources of waste
Business-to-consumer packaging		
Rigid plastic, flexible plastic	• Rigid plastic containers • Flexible plastic packaging and overwrap	• Event stadiums and spaces (includes arts and entertainment venues) • Retail, transportation, and grocery • Accommodations (hotels and motels) • Alternate accommodations (work camps, university dorms, long-term care homes) • Schools • Offices and workplaces
Paper, boxboard, old corrugated cardboard (OCC)	• Boxboard packaging • Cardboard boxes and flats • Food containers • Paper bags • Flyers; brochures; booklets, catalogues; newspapers; magazines; copy paper	
Glass	• Glass jars	
Metal	• Tins • Foil • Components of multi-material packaging, pouches etc.	
Business-to-business packaging		
Rigid plastic, flexible plastic	• Large format food packaging (e.g. jars, drums) • Agricultural packaging (e.g. silage wraps, twine) • Medical packaging waste (e.g. drug packaging, sharps) • Packaging from new construction materials • Flexible plastic wrap and bags	• Food service (restaurants, quick service, university and hospital cafeterias, events) • Retail and grocery • Warehouses • Manufacturing • Agriculture • Hospitals • Long-term care homes • Light industrial
Paper, boxboard, old corrugated cardboard (OCC)	• Large format packaging for light industrial • Packaging from new construction materials, shipping boxes • Flats (e.g. produce boxes) • Flyers; brochures; booklets, catalogues; newspapers; magazines; copy paper	
Glass	• Large format food packaging (e.g. jars)	
Metal	• Large format food packaging (e.g. cans) • Drums • Foil • Components of multi-material packaging	
Wood	• New construction materials (e.g. wood pallets, crates) • Bulk orders (e.g. wood pallets, crates)	• Retail • Construction and light industrial

What we have learned so far

The ministry has heard through the Union of BC Municipalities (UBCM) resolutions, meetings with First Nations and Indigenous organizations, previous engagements on the plastics action plan and EPR programs, and correspondence from business, recycling, and waste management associations that there are many opportunities available to improve the management of non-residential packaging waste. As outlined in Table 2, these organizations have shared ideas and identified concerns where non-residential waste management systems can be improved, or where the current system is causing challenges and is inconsistent. In some geographic locations or for some types of packaging, waste management has been reported as ineffective, costly to users and causing risks to the environment.

Some local governments, First Nations and small businesses have indicated there is a desire for B.C.'s residential packaging EPR program to be expanded to include collection from non-residential sources, such as small businesses or schools. There have also been examples of non-residential recycling being effectively managed within existing markets, which should be supported to continue, including businesses or organizations utilizing reuse options, such as crates or pallets, or recycling materials such as cardboard.

The table on the following page outlines a summary of what we have learned from key interested parties.

The CleanBC Plastics Action Fund has supported the Ocean Legacy Foundation to find innovative ways to replace new plastics by recycling marine debris.

Table 2: What we have learned from key interested partners on non-residential packaging waste

Local governments

- Union of BC Municipalities (UBCM) motions from local governments have requested action on non-residential packaging, based on the cost of managing waste and operating landfills.
- Local governments have requested expansion of existing EPR programs to cover packaging and paper products from non-residential sources.
- Local governments have submitted bylaws to the ministry for approval enabling actions such as requiring source separation of waste at businesses, banning specific single-use items, or requiring the use of reusables for on-site dining to prevent waste from packaging outside the home.

First Nations and Indigenous organizations

- Indigenous organizations have identified challenges managing waste in First Nations, including preventing and recycling non-residential packaging waste separately from the residential packaging waste.
- Some First Nations have challenges with non-residential packaging waste due to factors including community size or remoteness.

B.C. businesses

- Businesses are required to organize and pay for the waste management services that they need. Some businesses have limited options for managing their packaging waste.
- Larger companies and those located in urban areas may be able to manage their waste cost-effectively due to economies of scale and established waste management networks and infrastructure, but it is often more difficult and expensive for small businesses, or those in rural and remote locations to access recycling services.
- In some geographic areas of the province, collection and recycling are cost prohibitive, resulting in recyclable materials being stockpiled or sent to landfills.
- Some small businesses would like to opt in to the service provided through the residential EPR packaging program, as they otherwise lack affordable options to recycle their packaging waste.

ICI rural and remote working group

- In 2023, the ministry convened a working group, focused on North-Central B.C., to identify interim (non-regulatory) options to improve diversion of non-residential packaging. The working group was comprised of representatives from local governments, First Nations, businesses, and waste haulers. The interim options report, Recycling of ICI Packaging and Paper Products in B.C.'s Rural and Remote Communities, was created to summarize the working group's findings.
- Rural and remote areas of British Columbia are uniquely challenged with effective management and diversion of non-residential packaging waste due to distance from major centers/markets and associated increased costs, a lack of accessible infrastructure, a lack of facilities, services and subject matter experts and a lack of readily available, affordable options.
- Regional districts in rural and remote areas of the province continue to see increasing volumes of non-residential packaging waste at landfills, increasing their operational demands and overall costs.

Proposed outcomes

This discussion paper, and future work on policy approaches, are guided by the principles of:

- A clean environment and climate resilient communities, free of waste and pollution;
- A circular economy, supporting, B.C. businesses and jobs, where products and materials for as long as possible and materials can easily be repaired, reused, or recycled, and,
- A true, lasting, and meaningful reconciliation with Indigenous Peoples.

Building on the guiding principles, the proposed desired outcomes, are intended to support policy approaches that consider the entire lifecycle of non-residential packaging. The full lifecycle of packaging includes many users that are impacted by the packaging choices. This includes the companies that are involved from manufacturing packaging, the businesses that use packaging, the people who purchase goods and services in packaging, as well as the communities who help manage packaging, and the reuse, recycling and waste industry that provide services from washing to recycling or disposal.

Fresh Prep—a meal-prep delivery service—received funding from the CleanBC Action Fund and was able to increase the use of their reusable Fresh Prep Zero Waste Kit.

The proposed desired outcomes from improved management of non-residential packaging, including plastics and paper products are as follows:

Prevention-first approach: Actions are prioritized using the pollution prevention hierarchy (see inset on page 11), resulting in a focus on waste reduction and materials reuse over recycling, and recycling over energy recovery or disposal. Materials are kept out of landfills and the environment and are used at their highest value to support a circular economy.

Consistency and confidence: Prevention of packaging waste, including plastic and paper, is supported and incentivized through reuse and recycling whether at school, at work, or outside the home to build consistency between all programs across the province. Consistency in reuse and recycling options generates confidence that programs will be available, and materials are being reused and recycled at their highest value regardless of where they are generated.

Accountability and transparency: Businesses and institutions are accountable for their waste generation, management, and reduction efforts. Ambitious waste prevention targets and reliable, transparent systems of collecting data show progress in waste prevention for non-residential packaging, and assurance that materials collected are being recycled as intended.

Access: Businesses and organizations in all sectors (industrial, commercial, institutional, public) and communities have access to cost-effective choices to manage non-residential packaging and paper products, including recycling. Access to waste prevention and recycling options in First Nations communities are prioritized.

Economic benefits for a strong circular economy: Government leadership supports cost-effective, sustainable business practices, that leverage market conditions and create green jobs for British Columbians through prevention of packaging waste, including plastic and paper. Waste management spending and procurement promote a healthy environment and circular economy.

Maximize material recovery: Source separation, material collection, processing and recycling are improved to produce higher quality materials that are used in manufacturing new products with recycled content.

Discussion Questions

1. **Are there any desired outcomes missing from this list?**
2. **What outcomes are most relevant to your business, organization, or community?**
3. **How would you prioritize these outcomes?**
4. **Are there indicators or measures of success you would suggest are used to determine if an outcome is achieved or is achievable?**

Opportunities

Managing non-residential packaging, including plastics and paper, is a complex issue with many possible opportunities to prevent waste from entering the environment and filling up landfills. Because of the range of sectors and waste streams, no one approach will solve the waste management challenges for all non-residential packaging. B.C. will require a combination of options to move materials into the circular economy and keep packaging and plastic waste from polluting our environment and entering our landfills. Several opportunities have been summarized in this section, and through this engagement, we are looking for feedback on the opportunities presented, as well and details about any other actions that should be considered as solutions for non-residential packaging.

Provincial target setting

Targets are an important way to provide focus, to motivate action and measure success toward shared values and goals. For solid waste disposal, B.C. has had a long-term target to lower the municipal solid waste disposal rate to 350 kg per person per year. Decreasing the amount of non-residential packaging disposed is one part of the actions necessary to achieve progress towards this target. Many regional districts have set locally relevant targets, including regional municipal solid waste disposal rates much lower than 350 kg per person, and the ministry is looking at setting provincial targets for non-residential packaging aimed at promoting continuous improvement.

In the Recycling Regulation, it is expected that items regulated through stewardship programs will achieve, or are capable of achieving within a reasonable time, a 75% recovery rate or another recovery rate established by the director. The general trend for targets should demonstrate continuous improvement, and every stewardship plan has a target for the materials the stewardship agency is responsible for.

At the national level, several targets have been set in the last five years for addressing packaging and plastic waste. These include:

Environment and Climate Change Canada (ECCC) Ocean Plastics Charter

- Working with industry towards 100% reusable, recyclable, or, where viable alternatives do not exist, recoverable, plastics by 2030;
- Taking into account the full environmental impacts of alternatives, significantly reducing the unnecessary use of single-use plastics; and
- Working with industry and other levels of government, to reuse and/or recycle at least 55% of plastic packaging by 2030 and recover 100% of all plastics by 2040.

Canada Plastics Pact 2025 Targets

- Define a list of plastic packaging that is to be designated as problematic or unnecessary and take measures to eliminate them;
- **100%** of plastic packaging designed to be reusable, recyclable, or compostable;
- **50%** of plastic packaging is effectively recycled or composted; and
- **30%** recycled content across all plastic packaging.

Provincial targets for packaging waste for the non-residential sectors will be an important part of any policy approaches identified. Provincial targets for waste prevention, reuse, collection, and recycling can provide a consistent, unified goal for all businesses, organizations, and levels of government across B.C. Establishing targets can provide direction for businesses and communities, as well as a framework for collecting data and measuring success.

Discussion Questions

5. **Should non-residential packaging targets be the same, or better than existing residential packaging targets? Why or why not?**
6. **What types of targets would be most useful? Reduction targets; reuse targets; recycling targets; diversion targets?**
7. **Should there be regional or business specific targets in addition to provincial targets? Why or why not?**
8. **How can we measure success or progress against established targets?**

Supporting regional planning and local actions

A provincial approach to preventing non-residential packaging waste is important for providing consistency, and there are also opportunities and the need for local governments to continue to take actions to address their local waste challenges. Provincial guidance and regulations can support these actions, enabling local governments to prevent waste while requiring a level of uniformity with other jurisdictions within the province. For example, through the Spheres of Concurrent Jurisdiction – Environment and Wildlife Regulation under the *Community Charter*, municipalities have introduced bylaws that either ban or limit certain single-use items. Municipalities have expressed the desire to implement regionally specific actions such as requiring reusables for on-site dining, prohibiting the use of certain single-use or plastic items, or limiting the use of single-use water bottles. These types of actions may be able to be enacted at a local government level, and sometimes require approval by the ministry depending on the requirements and circumstances specific to the bylaw.

Solid waste management planning by regional districts will also continue to play an important role in local government waste management. Solid waste management plans can identify opportunities and needs for local waste management actions, including the prevention of non-residential packaging waste, the implementation of landfill disposal bans, setting requirements for source separation, or other programs or bylaws that can have an impact on non-residential waste management programs such as facility or hauler licensing.

Indigenous organizations and First Nations have provided information regarding the prevention of non-residential packaging waste that may be specific to Indigenous people and First Nations. First Nations often have unique challenges and opportunities regarding non-residential packaging waste and may benefit from actions specific to a community. The Province will continue to engage with First Nations to support initiatives to prevent non-residential packaging waste.

The Province anticipates continuing to support First Nations, municipalities, and regional districts to reduce packaging and plastic waste, while working to achieve desired provincial outcomes for the prevention of non-residential packaging waste.

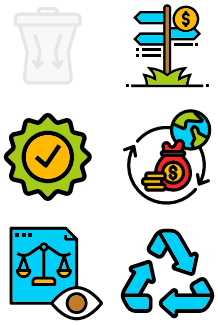
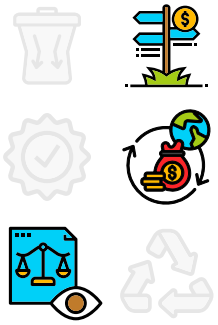
Discussion Questions

9. **What actions are best suited at the local, regional, or provincial level of government?**
10. **What factors should be taken into consideration if the Province enables or promotes local actions?**

Exploring provincial policies

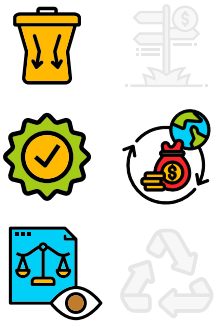
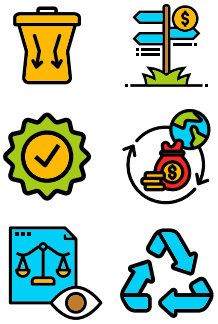
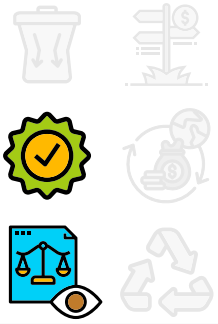
To address the complexity of the non-residential (ICI) sector and the Province's commitment to a circular economy, a range of policy actions will be necessary to manage non-residential packaging waste, including plastics and paper. In the table below, several provincial policy approaches have been summarized to address many aspects of non-residential packaging, such as business-to-business packaging, or packaging from a specific sector and to further prioritize a prevention-first approach, focusing on reuse. Each opportunity includes a link to another jurisdiction where similar polices are in place to provide more information about what that policy option could include.

Table 3: Policy approaches to address non-residential packaging

Desired Outcomes	Description	Example Materials and Sources	Examples from Other Jurisdictions
Policy option: List of designated recycled materials and supporting actions			
	A comprehensive list of packaging materials and types that are readily recyclable to support other actions, such as consistency between recycling programs, requirements for waste sorting and material acceptance, inclusion in expanded EPR programs, waste targets, or disposal bans.	**Materials** • Recyclables **Sources** • All	Oregon – Plastic Pollution and Recycling Modernization Act implementation
Policy option: Disposal bans for packaging materials			
	The province would regulate to prohibit designated materials from disposal across B.C. This option requires a system for reporting on compliance. This option would include setting a list of materials, establishing a target date, and identifying supporting actions for implementation.	**Materials** • OCC (old corrugated cardboard) • Organics, e.g. food scraps • Plastic • Other Recyclables **Sources** • All	Metro Vancouver – Disposal ban program

Desired outcomes

- Prevention-first approach
- Consistency & confidence
- Accountability & transparency
- Access
- Economic benefits for a strong circular economy
- Maximize material recovery

Policy option: Reuse requirements for specific sectors			
	Requirements for reuse in specific or designated sectors (i.e., closed loop systems - institutions, events). Would include systems for data collection and monitoring.	**Materials** • Single-use items • Recyclables **Sources** • Events • Institutions (food service providers) • Ferries/Airports • Hospitals • Work Camps	Banff – Reuse for dine-in; California jurisdictions – Reuse at events (Sausalito, San Francisco, Los Angeles)
Policy option: Standardized waste prevention and management actions for businesses and institutions.			
	Requirement for businesses and institutions to submit waste prevention plans, conduct audits or adopt specific waste prevention actions. It could also involve the Province providing guidance for waste prevention plans and waste audits to businesses and institutions to improve consistency and reduce burden for waste planning.	**Materials** • Recyclables • Organics, e.g. food scraps **Sources** • All	Ontario – O.Reg 102/94: Waste Audits and Waste Reduction Work Plans
Policy option: Provincial data standardization and sharing			
	Under solid waste management planning, develop standardized categories for waste audits, for local governments and/or businesses. Require sharing of metrics on waste audits or collection volumes between haulers, local governments and/or other businesses that are involved in the collection and management of waste and recycling.	**Materials** • Recyclables • Organics, e.g., food scraps **Sources** • All • Local Governments	California – Solid Waste Characterization

Desired outcomes

 **Prevention-first approach**

 **Consistency & confidence**

 **Accountability & transparency**

 **Access**

 **Economic benefits for a strong circular economy**

 **Maximize material recovery**

Discussion Questions

11. **What is already working to prevent packaging waste – for businesses, institutions, haulers, local governments?**
12. **Are there other actions that should be considered? What are they?**
13. **What are the benefits or limitations of these waste prevention options?**
14. **How ready are organizations, businesses, governments to implement?**
15. **How should implementation be prioritized?**

Extended Producer Responsibility programs

Producer funded EPR programs in British Columbia have shifted the cost of waste management from local governments and communities to producers and increased the collection and recycling of materials and transparently reporting on provincial outcomes. In 2022, B.C. had 19 EPR programs, including EPR programs that already accept packaging from non-residential (ICI) sources, such as deposit-refund beverage containers and some automotive product containers. Through work under the 2021-2026 Extended Producer Responsibility 5-year Action Plan, EPR continues to expand, including the inclusion of additional non-residential packaging such aerosol containers and other automative product containers.

Some local governments, small businesses and First Nations have identified a desire to expand B.C.'s EPR program to cover non-residential packaging and paper products. Recognizing that the non-residential sector is diverse, EPR approaches may be best suited for some aspects of non-residential packaging but are unlikely to be able to be applied across the entire sector. The table on the following page provides some examples of EPR opportunities that have been implemented in other jurisdictions and may be relevant for expansion in B.C.

Extended Producer Responsibility in British Columbia

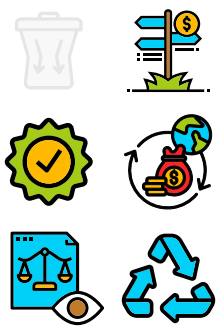
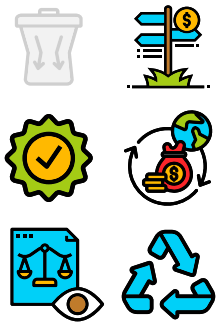
The Recycling Regulation requires producers (manufacturers, distributors, and retailers) of designated products to take responsibility for the lifecycle of their products, including collection and recycling. This approach, Extended Producer Responsibility (EPR), shifts the end-of-life responsibility from local governments, First Nations and taxpayers to producers and consumers.

Under this system, producers have the flexibility to use market-driven solutions, make cost-effective business decisions, and find innovative ways to operate their EPR programs to meet their regulatory requirements. These costs can be covered directly by producers or passed along to consumers through product pricing or by applying an additional charge on the purchase receipt, such as an "eco-fee".

B.C.'s EPR approach requires all producers to track their material and how it is processed. This data must be audited and reported annually, providing assurance that the program is meeting environmental commitments.

The EPR agency in charge of residential packaging and paper products in B.C. is RecycleBC. Many other EPR agencies operate in B.C. managing items from used oil to electronics to beverage containers.

Table 4: EPR approaches to address non-residential packaging

Desired Outcomes	Description	Example Materials and Sources	Examples from Other Jurisdictions
Policy option: Expansion of EPR to include packaging and paper products from more sources			
	EPR expanded to cover collection from businesses or institutions with similar waste streams, e.g.: Schools, offices and other workplaces, events, and out-of-home collection; Long-term care homes, university dorms, work camps; Potential to opt-in for small businesses or geographic locations or specific material types.	**Materials** • Grocery and consumer goods packaging • OCC (old corrugated cardboard) **Sources** • Schools • Long-term care homesAccommodations • Public parks, campsites • Small businesses • Industry • First Nations	Quebec – Modernized Quebec Selective Collection Systems Oregon – Plastic Pollution and Recycling Modernization Act implementation
Policy option: EPR stewardship for a specific sector			
	An organization or stewardship agency collects and manages reduction and recycling of packaging materials from a specific sector.	**Materials** • Specialty packaging materials **Sources** • Agriculture	Manitoba, Saskatchewan, and Quebec – Clean Farms regulated programs

Desired outcomes

- Prevention-first approach
- Consistency & confidence
- Accountability & transparency
- Access
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- Maximize material recovery

Discussion Questions:

16. **What are the benefits or limitations of expanded EPR options?**
17. **How ready are organizations, businesses, and governments to implement an expanded form of EPR?**
18. **Are there sectors or materials that should prioritized to be included or excluded?**
19. **How should implementation of EPR actions be prioritized (e.g. by sector, by material, by geographic location)?**

Your feedback

Preventing non-residential packaging waste, including plastic and paper, is a complex policy issue and requires a variety of perspectives from interested parties to develop a comprehensive approach that will work for B.C.

Recognizing the complexity of this policy challenge, the ministry is engaging Indigenous organizations and First Nations, businesses, local governments, organizations, sustainability and waste managers, waste haulers, the public and other interested parties to provide feedback in a variety of ways:

- A survey for public feedback is available through EngageBC (engage.gov.bc.ca/preventingwasteoutsidethehome).
- Written responses to the Discussion Paper questions relevant to you can be emailed as an attachment to circularcommunities@gov.bc.ca. We are looking for input from waste generators, waste haulers, producers and all other parties who are knowledgeable in this topic.
- Roundtables and webinars will be available for Indigenous organizations and First Nations to gain better understanding of the needs and concerns specific to First Nations.
- Info sessions and workshops will be offered to those interested in the topic to gather information on the policy approaches outlined and the identification of other potential policy opportunities.

Province of British Columbia

April 2024