

Preventing Non-Residential Packaging Waste Engagement Summary

Ministry of Environment and Parks
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Prepared in partnership with the
Citizen Engagement Team
Service BC & Government Digital Experience



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Links to Related Materials

[Indigenous Engagement Summary](#) (PDF, 3MB)

[Survey Summary](#) (PDF, 2.9MB)

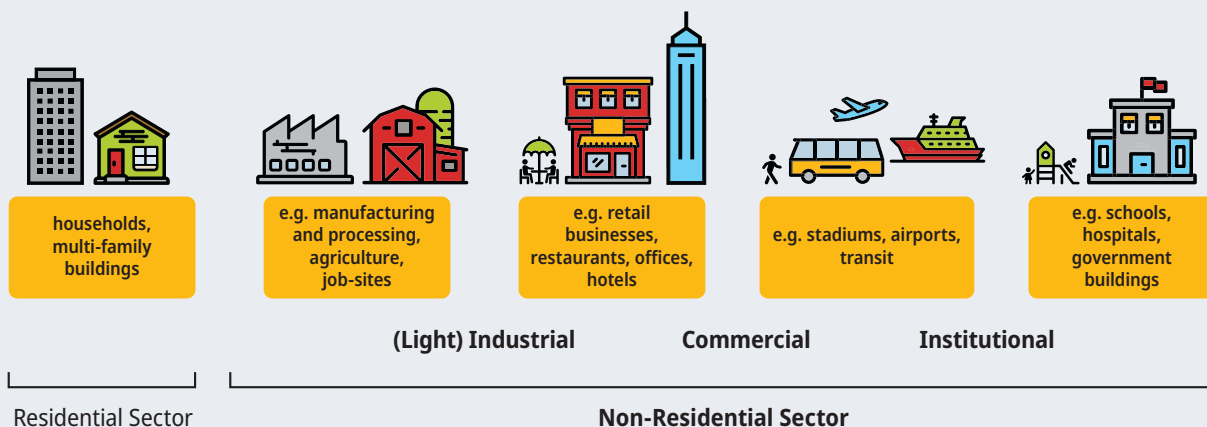
[Written Submissions](#) (PDF, 28MB)

Introduction

In spring and summer 2024, the Ministry of Environment and Parks published a [discussion paper](#) to seek feedback on how to prevent packaging waste from non-residential sources, also known as the Industrial, Commercial and Institutional (ICI) sector. This includes plastic and paper packaging, as well as other materials such as glass, metal and wood used in packaging in institutions, businesses and industry (e.g., schools, healthcare setting, offices, restaurants, and job sites).

Input from this engagement will be used to work towards identifying policy approaches to keep packaging materials out of our landfills and the environment. The 2021-2026 Extended Producer Responsibility Five-Year Action Plan also included the commitment to identify a policy approach for non-residential (ICI) packaging and paper products in 2025.

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



Engagement

Through the engagement, the Ministry of Environment and Parks received feedback from the public, First Nations, local governments, businesses, institutions, producers, industry, waste management service providers and other interested parties.

How we sought feedback

Feedback was asked for through:

- **Information sharing sessions:** Nine information sessions, attended by over 300 participants, were held to share information, answer questions, and identify further feedback opportunities.
- **Workshops:** Two interactive workshops were held for representatives of interested parties, to provide input and hear other perspectives (28 and 27 attendees).
- **Written Submissions:** Sixty-nine written submissions were received from interested parties, such as businesses, associations, nonprofit organizations, local and Indigenous governments.
- **Public Survey:** A public survey provided an opportunity for feedback to assess public opinion, beliefs, and priorities regarding preventing waste from packaging in non-residential settings. Six hundred and fifteen responses were received.
- **Indigenous roundtables:** Indigenous Peoples were invited to participate in three virtual engagement sessions. A summary of the process and outcomes is available from the [Indigenous roundtables report](#).



Respondent categories

When reviewing written submissions, respondents were organized into six main categories, based on the type of organization they were affiliated with:

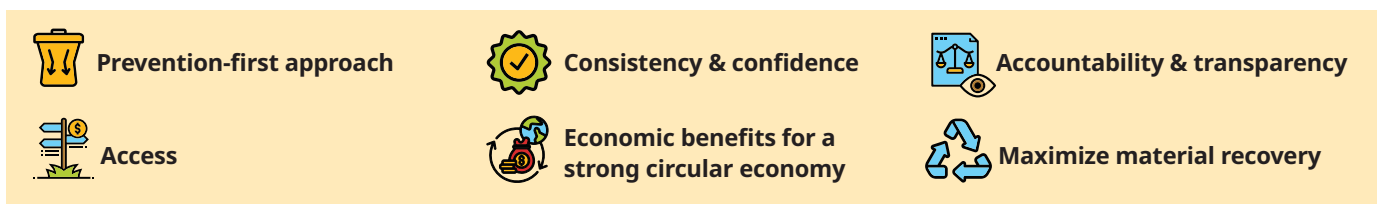
- **Indigenous Communities and Nations** – includes Indigenous Nations, communities and organizations in B.C.
- **Local Governments** – includes both municipalities and regional districts
- **Commercial and Business Sectors** – includes retailers, restaurants, and associations that represent these organizations
- **Industry and Producer Sectors** – includes producers of packaging as well as light industrial activities such as agriculture
- **Institutions and ENGO Sectors** – includes institutional facilities, such as health care or educational facilities, as well as environmental not-for-profit organizations
- **Recycler and Hauler Sectors** – includes waste management businesses for recycling as well as disposal
- **Public responses** were received through the survey (see [survey summary](#)), recognizing that many of the public respondents could also be affiliated with one of the other six categories.



Summary

Throughout the engagement, respondents agreed with the need for a multi-faceted approach to address packaging waste outside of the home, recognizing that no one policy approach will achieve the desired outcomes to increase the prevention, reuse and recycling of non-residential packaging.

There was general support for the proposed desired outcomes identified in the [discussion paper](#) for improved management of non-residential packaging:



Also associated with the outcomes, respondents expressed the need for clear education and communication regarding waste prevention and management.

This report summarizes the findings from the engagement under seven key themes:

- **Data driven decision making**
- **A prevention-first approach**
- **A role for extended producer responsibility programs**
- **Improve access across the province – rural communities**
- **Consideration of financial impacts**
- **Readiness**
- **Collaboration, communication and education**



Key Themes

THEME 1 | Data Driven Decision Making

Respondents from all categories identified a need for data on non-residential waste and packaging to help inform decision making. Many highlighted the importance of waste audits, material flow analysis, and monitoring waste diversion rates to support accurate and comprehensive data. Respondents from all sectors identified a need for data standardization and transparency, and feedback overwhelmingly emphasized the importance of robust data collection, reporting mechanisms and the ability to track progress against established targets.

Discussions about data included:

Standardized data

- The importance of standardized data collection to facilitate data sharing and informed decision making was identified.
- The need for robust data collection, including waste generation, collection and recycling rates and the availability of end markets.
- The role of industry and businesses, including waste haulers and processors, in data collection and reporting was identified.
- Improved guidance to support data consistency (i.e., waste prevention plans and waste audits).
- The need for a comprehensive list of recyclable materials is seen as crucial for supporting several policy approaches aimed at improving waste management and recycling outcomes.

Targets

- Most respondents identified that targets should be more ambitious than the current residential packaging targets.
- The Commercial and Business sector generally emphasized the need for achievable and realistic standards and targets.
- Several sources identified regional, business or sector (i.e., health, foodservice) specific targets would address the unique challenges and opportunities of different areas and sectors.
- Respondents indicated reduction targets were among the most useful, followed by reuse targets and recycling targets with general support for all types of targets across sectors.

THEME 2 | A Prevention-First Approach

Across written responses, workshops and in the public survey there was strong support for a prevention-first approach, preventing material usage at the source to keep it out of landfills and the environment. This includes designing products and packaging to minimize waste, encouraging reuse and repair over recycling, and reducing overall material use. The prevention-first approach was also noted for encouraging innovation and aligning with Indigenous values as well as global best practices.

Several respondents, largely local governments, emphasized the importance of the [Golden Design Rules](#) as an example of guidance that supports a prevention-first approach. Some respondents identified the need to shift to more recyclable or compostable materials, for example by manufacturers moving away from multi-layer materials.

Workshop participants noted the need for consistent, province-wide regulations to support reuse initiatives across various industries. Overall, the responses highlight potential benefits of reuse requirements, such as reducing waste and promoting sustainability, while also identifying potential challenges, such as the need for consumer education and support, and the importance of considering different sectors and industries.

Disposal bans, where materials are restricted from being disposed of in landfills, were also viewed by some respondents as a tool to drive waste prevention. Disposal bans can encourage the use of alternative materials as well as other disposal options, such as recycling or composting. It was noted that disposal bans are most effective where there is a clear regulatory framework, including considerations for education and enforcement. Disposal bans are already in place in some areas of B.C.



THEME 3 | A Role for Extended Producer Responsibility

There was much discussion about extended producer responsibility (EPR) and general agreement between respondent categories that there are circumstances where EPR in the non-residential sector would be beneficial. There was also general agreement that EPR will not work across all non-residential sectors, with the Industry and Producer, Commercial and Business, and Recyclers and Hauler sectors most frequently expressing this concern. Businesses concerned about expanded EPR frequently identified concerns regarding increased costs if EPR is applied across the sector.

Packaging that is similar to packaging types already collected through residential EPR programs was frequently identified as one area where it may be appropriate to expand EPR. This could include consumer packaging and cardboard. For these packaging types it was identified that there may be potential cost savings by integrating these materials with existing EPR systems.

Areas where respondents identified EPR as an opportunity for expansion include:

- First Nations communities (all packaging)
- Institutions, such as schools, care facilities
- Rural and Remote communities, particularly small businesses (without current service)
- Agriculture – voluntary EPR
- Construction



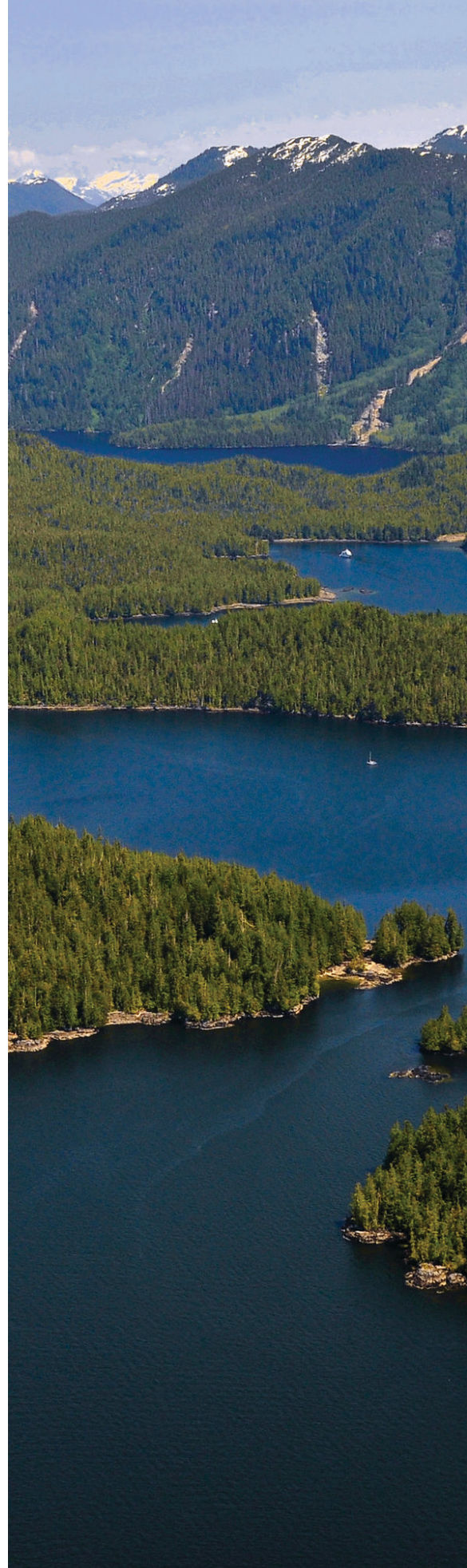
THEME 4 | Improve Access Across the Province - Rural Communities

Access was identified as one of the most relevant outcomes for the majority of respondents across all sectors. It was recognized that many communities outside of the metropolitan Vancouver and Victoria regions face distinct challenges in waste management due to factors such as limited access to recycling facilities, longer transportation distances, and smaller volumes of materials.

This includes First Nations communities, with Indigenous respondents, some local governments and businesses identifying the unique challenges faced by these communities, with limited access to services and infrastructure for recycling and waste prevention. The need for accessible disposal and recycling facilities, clear information and resources, a fair and equitable system, and a nuanced approach that considers the unique needs of different sectors were highlighted.

Feedback also highlighted the need for smaller businesses and institutions, often in rural communities, to be able to access the necessary infrastructure, information, and support to participate effectively in waste reduction efforts across the province. A desire for better access to reusable options was also identified, particularly by survey respondents.

Regionally specific targets were identified as an option to gain a better understanding of the state of underserved areas and to support program effectiveness and fairness. Measuring access towards regionally-specific targets can also contribute to meeting targets set regarding waste diversion services and infrastructure.



THEME 5 | Consideration of Financial Impacts

Respondents from all sectors identified considerations regarding the costs of preventing packaging waste. Financial considerations are prevalent throughout the feedback, with a focus on cost-effectiveness, affordability, and incentives. Concerns were identified by the Business and Commercial, and Recycler and Hauler sectors regarding possible increased costs associated with the management of packaging waste. Some local governments noted that local governments are currently subsidizing the cost of recycling non-residential waste.

There was an emphasis from all respondents on the importance of cost-effective access to waste management options, especially for small businesses and rural communities. This is of particular concern in situations where long hauling distances and more limited waste management infrastructure result in increased costs. Extended Producer Responsibility (EPR) was identified as one solution that could shift costs to producers; however, it was also identified that it might increase expensis for businesses and consumers.

It was noted that where EPR programs exist, managing similar types of packaging from additional sources may provide cost savings and efficiencies. Small businesses and institutions are two examples of sources where packaging waste may be similar to what is managed through existing EPR programs.

Feedback from different sectors included:

- Some respondents from the Recycler and Hauler sector noted that a competitive waste management market would encourage innovation, improve efficiency, and provide businesses with greater choice and flexibility in managing their waste.
- Indigenous respondents, some local governments and the Recycler and Hauler sector identified a need for investment in recycling infrastructure and financial support for infrastructure, tax breaks and incentives.
- Comments from the Commercial and Business Sector suggested actions related to promoting a circular economy and modifying procurement processes would be beneficial to support demand for recycled materials and improved waste management.

THEME 6 | Readiness

Respondents noted that some sectors, geographic areas or material types may be better suited to take actions sooner. It was generally noted that the non-residential sector is not consistent and will require phased, flexible approaches to improve waste management.

The foodservice industry (restaurants, cafes etc.) was identified through the public survey, as well as by local governments, as one of the priority areas for waste prevention actions. Alongside the foodservice industry, events and stadiums, retail, and schools were the top four priority areas identified in the public survey for waste prevention actions in the non-residential sector.

Respondents also noted that some materials are easier to divert than others. Materials such as cardboard, clean rigid plastic and organics often have more established markets with existing recycling or composting facilities. Materials with established recycling systems, or accepted in composting facilities, may provide opportunities for earlier implementation of programs or approaches.

Several municipal and regional districts noted how local governments are taking proactive steps to address the issue of non-residential packaging and paper product waste, often moving ahead of provincial regulations. These initiatives vary in scope and approach but demonstrate a willingness to find solutions and provide an opportunity to test approaches at a local level that may be applicable across the province. There was broad appreciation for the challenges of local conditions and the overall need to account for local capacity differences, as well as how regulation may affect vulnerable groups, particularly those in rural and remote communities.

Respondents across all sectors also emphasize the limitations of local action and the need for a coordinated provincial approach to ensure consistency, equity, and effectiveness to support confidence in recycling and reuse systems across the province. This can include consistency in the materials that are accepted for recycling or signage to determine how items are to be sorted for disposal or management.



THEME 7 | Collaboration, Communication and Education

Industry and Businesses noted the need for collaboration between interested parties and the governments to implement policy approaches. This collaboration will help to ensure that programs are tailored to specific needs, address local challenges, and gain widespread support. Clear communication is also needed to ensure that waste prevention targets and measures are understood and implemented.

Local Governments frequently identified the need for increased public education on recycling practices and waste reduction, including clear guidelines regarding what can be recycled. Public education and awareness campaigns are important to promote responsible waste management practices. Indigenous feedback highlighted the importance of educating youth about waste prevention and recycling to promote waste prevention behaviors throughout the community.

Survey respondents also strongly supported the need for clear information regarding what is and is not recyclable. Written feedback from survey respondents identified the need for improved education on recycling practices and waste reduction, clearer labelling on packaging regarding recyclability, and better signage for sorting waste, organics and recyclables.

Thank you!

The Ministry of Environment and Parks appreciates the time and thought taken by respondents to contribute feedback through workshops, information sessions, written submissions and the survey. The views and comments received during the public engagement process are valuable, and will help provide a strong foundation for the development and implementation of policy approaches to prevent non-residential waste in British Columbia.