

# Preventing Non-Residential Packaging Waste

# Written Submissions

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Submissions received in the Preventing Waste Outside the  
Home Engagement (Spring & Summer 2024)

# Table of Contents

District of Squamish.....	1
Sunshine Coast Regional District .....	10
Vancouver Coastal Health .....	13
District of Kitimat .....	15
BC Agriculture Council.....	21
Town of Gibsons .....	23
Regional District of Central Kootenay .....	25
Regional District of North Okanagan .....	28
Alberni-Clayoquot Regional District.....	36
BASF Canada .....	42
BC Dairy .....	45
Vio Sustainability .....	47
Clean Farms .....	52
Chemistry Industry Association of Canada (CIAC) .....	56
Binner's Project .....	66
Canadian Franchise Association.....	70
Cariboo Regional District .....	73
Carton Council Canada.....	77
Canadian Consumer Specialty Products Association .....	80
Canadian Federation of Independent Business.....	84
City of Richmond .....	92
CKF .....	102
Dart Container Corporation.....	107
Regional District of Nanaimo.....	112
Cowichan Valley Regional District.....	119
Electronics Product Stewardship Canada .....	130
Federated Co-operatives Limited .....	133
Husky Technologies .....	136
Columbia Shuswap Regional District.....	141
KC Recycling.....	143
Nelson and District Chamber of Commerce.....	144
BC Landscape and Nursery Association.....	146
Recycling Alternative .....	147
Lactalis Canada Inc. ....	152
Ocean Legacy.....	156
Thompson Nicola Regional District .....	169
Cassidy v. Ros.....	175

Nanaimo Recycling Exchange Society .....	180
Ocean Wise .....	191
Polystyvert.....	198
Paper and Paperboard Packaging Environmental Council.....	202
Metro Vancouver .....	217
EcoSafe Zero Waste.....	223
Resort Municipality of Whistler .....	230
Campbell River Adventure Tours Group.....	236
Regional District of Kootenay Boundary.....	238
City of Kamloops .....	241
Vitatek Solutions.....	246
Regional District of Fraser-Fort George .....	250
Regional District of Kitimat Stikine .....	253
Recycle BC .....	258
Recycling Council of British Columbia .....	262
Allworld Packaging Supplies Ltd .....	266
Restaurants Canada.....	269
Retail Council of Canada .....	276
Squamish-Lillooet Regional District.....	288
Surfrider Foundation Canada .....	295
Island Health.....	300
Waste Management Association BC .....	302
BC Green Business / Synergy Foundation.....	307
Zero Waste BC .....	308
City of Victoria.....	317
GreenCare .....	327
BPI.....	339

July 22, 2024

To Whom It May Concern,

Thank you for the opportunity to provide feedback on the discussion paper on the Preventing Waste in British Columbia: Non-Residential Packaging & Paper Products. The District of Squamish is committed to a Zero Waste future and acknowledges that climate change is happening, and local governments play an important role in reducing greenhouse gas emission and supporting the circular economy. The need to respond to climate change is urgent and achieving a systematic change around zero waste and a circular economy is a key component. Our current resource consumption systems not only create waste but also generate a huge amount of greenhouse gases which constitute some of the discharges that threaten the environment and human health. The work that the Province has outlined in this discussion paper can play a key role in changing these consumption systems, as long as there is a recognition of the need for continuous improvement to move the dial.

The District appreciates the acknowledgement by the Province given to the complexity of non-residential packaging waste, and agrees that a combination of actions and a phased approach will be required to achieve the change that is needed. The District supports the goals of reducing waste in B.C., to ensure that residents 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.

### Discussion Questions

#### Proposed Outcomes:

##### **1. Are there any desired outcomes missing from this list?**

While a Prevention-First approach is critical, there needs to be an emphasis on reducing the use of packaging overall, followed by the minimization of the use of packaging, and decreasing overall material throughput. Despite increases in diversion, we are seeing an increase in the consumption of materials, leaving the disposal weights that come to the Squamish Landfill very similar. The District is looking for systemic change instead of one-off solutions that don't drive true change within the system and all stakeholders. The District would like to highlight that requirements for recycled content should not be a method to continue to allow unsuitable packaging; policy needs to tie back to producers to drive systemic change.

Efficiency is also an outcome to add to the list. It may make sense for the stakeholders to leverage existing infrastructure and systems within the residential sector so that efforts are not duplicated, or systems are not redundant (i.e., collection and or processing can be blended with residential system where it makes sense). It is incredibly costly to set up a collection depot, receiving facilities and MRF's to sort the material before it is sold or utilized.

In the Transparency outcome, it needs to be made simple and clear for businesses that it is required or recommended to reduce their waste and ensure what remains is sorted into at least three streams (organics, recycling, disposal).

Equity is a key focus for the District of Squamish, and should be addressed throughout all of the outcomes, including those that are already listed, as well as equity for those businesses small and large, rural and urban, etc. The system needs to be user-friendly and not overly complicated. Service should be paid for by producers and not require subsidies from local governments, and the producers need to take responsibility and be held to account for what they create and sell into the markets.

## 2. What outcomes are most relevant to your business, organization, or community?

All of the identified outcomes are extremely important. The prevention first approach is important to see progress in prevention and circularity. Access and equity are also very important as the system should equally work for big businesses in large urban centers, and for the small to medium sized enterprises in smaller and remote communities, so that small businesses (even those in more urban areas) are not penalized by higher costs in areas where there is a monopoly on providing diversion services.

## 3. How would you prioritize these outcomes?

All of these outcomes are important. A tentative prioritization would be:

1. Prevention and circularity,
2. Access,
3. Consistency and confidence,
4. Accountability and transparency,
5. Economic Benefits for a strong circular economy,
6. Maximizing material recovery.

## 4. Are there indicators or measures of success you would suggest are used to determine if an outcome is achieved or is achievable?

The indicators of success the District would like to see used include (but aren't limited to):

- **Prevention First:** non-residential entities and MRFs track and report the following to ensure they are making strides to reducing and preventing waste:
  - The amount of packaging by type that is used (in the market) or collected,
  - The amount of virgin packaging that is created,
  - Kg per (some sort of unit of measurement like \$ good sold) packaging generation,
  - Percent of the weight of packaging relative to the product (with targets to drive packaging reduction),
  - How much is reused, recycled or disposed, as well as waste generation levels with the goal of reduction, how reuse is being prioritized.

- **Consistency & Confidence:**
  - How/Amount of reuse is supported by the Producer (%),
  - Plastics registry data on total materials used, with decreasing targets,
  - % of what materials are reused, recycled, captured,
  - Details on the kinds of materials per type (how much is designed for reuse and recycling for plastic, paper, glass, metal, etc.) and degree of recycled content,
  - Use of reusable packaging and cycles of use.
  
- **Accountability and transparency:**
  - Number of ICI locations without three stream systems (ex. School Districts, Post-Secondary Schools, Work Camps, and Health Authorities have to report out on this information),
  - Waste Prevention & Management plans are a part of receiving a business licence.
  
- **Access:**
  - % of businesses served by sector and by region,
  - Average cost to businesses to divert by region and industry,
  - Number of collection service providers and processing facilities across the province.
  
- **Economic benefits for a strong circular economy:**
  - Number of jobs within the sector, and a year over year increase targeted,
  - The amount of new job opportunities created,
  - Amount of new training opportunities that have been provided as part of a focus on the green and circular economy,
  - Identification of new industries that may have been created.
  
- **Maximize material recovery:**
  - % of material recovered is sent to end markets,
  - Report on the processing systems within BC (number, type, and changes/improvements).

#### **Provincial Target Setting:**

#### **5. Should non-residential packaging targets be the same, or better than existing residential packaging targets? Why or why not?**

The District of Squamish believes that it is important to understand what data is possible to acquire and how it can be measured, and thereby create a baseline before the targets are developed. Ideally, the targets are higher than the residential packaging targets, as there will be no change in the system if there is no incentive to change. However, we would like to ensure the financial impact on businesses, in particular smaller businesses, is taken into consideration, where perhaps implementation is taken in a phased approach, with fines being brought in at a later date. The District has consistently observed that businesses are willing to absorb the cost of higher rates (ex. the [District's Surcharge on Banned Material](#) is consistently paid by businesses, instead of taking the time and resources to separate out the recyclables). The goal is systemic change and continuous improvement.

Enforcement will have to be taken into consideration and addressed in the program development.

## 6. What types of targets would be most useful? Reduction targets; reuse targets; recycling targets; diversion targets?

When focus is placed on downstream targets, such as recycling, it can limit the steps that are taken in the first place to first reduce the amount of waste being generated. For that reason, the District would like to see a focus on reuse and reduction targets, as they are very important to actually limiting the amount of waste that is generated. Overall reuse targets would create a clear intention and result in confidence & stability in market investments & infrastructure. This would encourage a shift in markets to support strong circular economic principles. Reduction targets from non-residential generators quantified by both the weight and the number of packaging units would encourage a true reduction as opposed to switching to lighter materials that may have a greater environmental impact.

Targets for diversion should be reported, however, as previously mentioned, the focus should be on reduction, reuse. Targets for recycling need to include both the capture rate and the rate of ultimate recycling (when the material is sold as a material to be put back into similar products).

Additional targets include:

- Awareness amongst the ICI, by sector and variety of size of businesses, of the regulation and the requirements,
- Targets provincially for positive regulations. Similar to the provincial target for population covered by organics disposal bans) that could cover the % of population with dine in requirements, deconstruction bylaws, three stream sorting requirements, etc.
- Targets for supporting local circulation of food and products.

## 7. Should there be regional or business specific targets in addition to provincial targets? Why or why not?

There should be sector specific targets as different industries deal with and produce different types of packaging and systems.

Also, there should also be regional targets so that access is fair across the province, to ensure that it is not just urban areas that get action and service, however, it should be noted that some regions, such as the Squamish-Lillooet Regional District has areas of high density and areas that are extremely rural and remote. Therefore, any targets developed needs to take the heterogenous nature of the regions. If an EPR system is created, there should be targets to ensure all municipalities, and First Nation communities that opt in, get fulsome services.

As the industry and situation evolves, new targets should be added or current ones revised, as appropriate.

It also may be beneficial to implement “a list of plastic packaging that is to be designated as problematic or unnecessary” in the commercial sector, similar to what the Canadian Plastic Pact has done for their 2025 goals, as these problematics could be replaced by easier to recycle materials.

## 8. How can we measure success or progress against established targets?

Success could be measured both qualitatively and quantitatively. MOE could start with initial data retrieval of non-residential generators to establish accurate data (regarding total waste disposed) and then make the data publicly available for transparency. Waste composition data can be assessed, and a standard methodology for waste composition studies as it relates to the ICI sector can be developed, and the audits should be industry-funded.

There are currently significant data gaps in the system which need to be addressed. This includes total waste disposed, as there is leakage of waste over the provincial and federal borders. The province should license all haulers and require data reporting by material type, customer type and any materials that cross regional or provincial borders. The District of Squamish has considered enacting this locally, however, to-date, it has come at an administrative cost that cannot be justified at the municipal level in Squamish yet.

From a producer perspective, the federal plastics registry will cover one material but the province could also consider tracking the other materials to have a more complete picture and understand shifts in the material flows and types.

In addition, looking at improvements in infrastructure and market connectivity, especially in rural communities and regions will help determine if targets are successful at supporting circular economic principles and market stability.

### Local Actions:

## 9. What actions are best suited at the local, regional, or provincial level of government?

The District is extremely supportive of progressive actions that will drive change and establish a circular economy and reduce waste creation and disposal within the community. However, resources are limited, and developing new bylaws, communicating and enforcing them all require staff time and funding. It is for this reason, as well as to ensure provincial consistency of the actions, that the District would like to see the majority of actions managed at the Provincial level. There are many communities where it would be difficult to obtain the political support, or staff capacity, for these actions, as well as it is extremely difficult when neighbouring communities have different regulations that apply to businesses within those communities, which can cause increased cost and confusion.

Local and regional governments are more suited to supporting education and awareness of provincial actions.

For Example:

- Local – Disposal Ban, Source Separation Requirements for ICI, Communications, Clear Bag requirement to support disposal bans, Solid Waste Reduction Plans as part of business licensing
- Regional – Disposal Bans, SWMP, Source separation for ICI, Clear Bag requirement to support disposal bans, Reusable program development
- Provincial – Disposal Bans, Expanding EPR to cover ICI, Overarching Reuse & Reduction Requirements, Waste Hauler licensing, Waste Hauler mandatory reporting (with data anonymized but made public for all province, by municipality, First Nation community and RD), Action on online shopping/packaging, Clear Bag requirement to support disposal bans, solid waste reduction plans as part of business licensing (including provisions to fill in gaps



for areas where regional districts may not license businesses), support for a province-wide reusable pallet program, support to switch to reusable beverage and takeout ware systems province-wide.

#### **10. What factors should be taken into consideration if the Province enables or promotes local actions?**

There is a lack of resources and capacity to take on these actions at the local and regional level. Economies of scale and consistency in action application can be achieved at the provincial level. Significantly more impact can be achieved by the Province than every local government acting alone on this.

#### **Exploring Policies:**

#### **11. What is already working to prevent packaging waste – for businesses, institutions, haulers, local governments?**

- EPR for residential PPP with mandatory reporting and third-party audits is working to have an established program with verifiable data and producers paying a significant amount of the costs.
- In Squamish, while there is a disposal ban at the landfill, a lot of banned recyclable material is still accepted in the Landfill and the District charges a significantly increased rate. Supporting Landfill Disposal Bans signals to the market there is a change, however, they need to be supported with systems to divert the material too, as well the bans are costly for local governments to enforce, so they cannot be the main solution and they are not that effective.
- Squamish also has a three-stream sorting requirement for ICI businesses; however, it requires a lot of staff capacity to enforce and communicate.
- Voluntary actions by some businesses and industry have also had an impact but need to be regulated to level the playing field, ex. LUSH Cosmetics has a take-back program because black plastic isn't always identified by optical sorters at a MRF, so they take back their black plastic pots and grind them and re-use the plastic, at a cost to the business.

#### **12. Are there other actions that should be considered? What are they?**

- Ensure that there is a comprehensive and long-term and ongoing education and awareness on whatever program is established.
- EPR for ICI should be thoroughly considered.
- Research the German Reusable Pallet program, as well Walmart Canada seems to have one as well. And establish a provincial program (and advocate for it to be federal). Similarly, there are some reusable programs to replace cardboard boxes between distribution centers and wholesalers and businesses, these should be further developed and rolled out at a provincial level.
- Develop a provincial clear bag mandate.
- Three stream (or more) collection should be mandated for all ICI, including School Districts, Post-Secondary Schools, Work Camps, and Health Authorities. This should be supported with education, training and tools for the businesses.
- Temporary ICI users, which include construction sites and the film/event industry should be captured in the work the Province is conducting.

- Celebrate the story of those organizations that have established a reuse or reduce program that might be able to be replicated.
- Develop a list of designated recycled material and supporting actions -should also include designate reusable products with supporting action.
- Research financial penalties for

### **13. What are the benefits or limitations of these waste prevention options?**

All of these waste prevention options have specific benefits and a combination of several (or all) of these options would make for a robust and comprehensive program.

As the Non-Residential Paper & Packaging White Paper identifies early on, due to the range of sectors and waste streams, not 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. Many of the costs related to managing this material is carried by the environment or local governments, it is time for the costs to be internalized by the producers and creators of the system.

The approach must be multi-faceted, from trying to remove problematic recyclables, implementing disposal bans and production requirements, encouraging reuse, data tracking and management to EPR considerations. Systems changes do not occur overnight, and the District supports the Province in the work they are doing on this topic.

### **14. How ready are organizations, businesses, governments to implement?**

The District of Squamish already has some regulation in place, such as a disposal ban at the landfill, source-separation requirements and clear bag requirements (which hasn't been enforced). There may be some resistance from businesses, but generally, District staff have heard from businesses and institutions that they want to participate in waste prevention and diversion programs. It is recommended that the implementation is done in a phased approach.

### **15. How should implementation be prioritized?**

Each of these actions are key priorities but the phasing may look different and should be coordinated. There should be a phased approach as well as sector-specific approaches. The initial phase should be collecting all of the data that the Province doesn't have yet to develop the baselines for the different actions.

Priority should be given to those sectors that:

- Align with the residential EPR system, so that they can be harmonized easily and the material can be recovered through those systems.
- Are large and have systems already in place, and can be rolled out provincially, such as the School Districts, Post-Secondary Schools, Work Camps, Health Authorities and Provincial Corporate Offices.
- Have central spoke-and-wheel models of distribution, so by targeting large distribution centres or a wholesaler, so material can be back-hauled or reusable systems can be implemented easily.

### **Extended Producer Responsibility:**

#### **16. What are the benefits or limitations of expanded EPR options?**

The benefits include a well-defined system that is proven to work expanding to collect more materials. This would strengthen existing EPR by demonstrating a growing, reliable market for these already divertible/recyclable materials. It would also encourage businesses to recycle more as the costs would be carried by the producers, not each small business and public institution. It would build on efficiencies and synergies with existing programs and systems, costs driven back to producers so possibly gains in prevention and design change, especially if the program plan is actually required to follow the hierarchy. It would provide access to markets that may not be available otherwise. Small businesses in particular can find access to recycling cost-prohibitive, as it is a premium to divert.

It is also important to ensure the best system is being employed to prevent competition/non-competition issues such as disappearance of some well-qualified small businesses, lack of service in some areas, not adequately compensating local government service providers, challenges with access to markets for non-participants, lack of competition among service providers. Ideally a new Crown Corporation could be created to run the program to ensure that the issues such as the disappearance of some well-qualified small businesses, lack of service in some areas, not adequately compensating local government service providers, challenges with access to markets for non-participants, lack of competition among service providers, etc. don't occur.

#### **17. How ready are organizations, businesses, and governments to implement an expanded form of EPR?**

There are many in our community that are ready, however, there are others that will meet an expanded form of EPR with resistance or frustration.

There is a need for a widespread education campaign to ensure businesses, institutions and local governments understand their roles and the benefits of such a program, if it is pursued.

#### **18. Are there sectors or materials that should be prioritized to be included or excluded?**

Some sectors would be more challenging, such as the construction or film industries. While others would be a seamless transition (schools, offices, residential-type premises, retail). Materials that are already covered under residential EPR should be prioritized.

No sectors should be excluded, those with extreme challenges could be phased in later, with the focus on the bigger impact and low-hanging-fruit at the beginning.

#### **19. How should implementation of EPR actions be prioritized (e.g. by sector, by material, by geographic location)?**

EPR could be prioritized by material type, with those such as OCC, glass, etc. be an initial focus, with expansion to those materials that are harder to recycle, as well as by sector.

### Outstanding Items to Note:

Following a few additional comments to take into consideration when developing the plan to address these materials:

- The Circular Economy inset on page 7 is a good outline, however, circular economy should be included in the fundamental first step which is to reduce the throughout and use of material and reduce the use and creation of toxic materials.
- There currently is significant subsidization happening by local governments in the recycling systems for ICI materials (facility ownership and management).
- EPR must support full access to services and prioritize redesign, reuse and then recycling, therefore the collection rate (or recovery rate) cannot be the only metrics considered.
- Innovation and investment into circular economy is required by producers to make the required systematic change.
- There should be support for increased manufacturing facilities that make recycled content materials (ex. paper mills and plastic manufacturing) .

The District of Squamish appreciates the opportunity to provide feedback and would like to reiterate that this is an opportunity to reduce environmental impacts and the efforts and initiatives in this area should continue to be strengthened.

Sincerely,

Shannon White

Integrated Solid Waste Specialist

**District of Squamish** | *Hardwired for Adventure*

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



July 19, 2024

Honourable George Heyman  
Minister of the Environment and Climate Change Strategy  
PO Box 9047 Stn Prov Gov  
Victoria, BC V8W 9E2

Via email: ENV.Minister@gov.bc.ca

Dear Minister Heyman,

**Re: PREVENTING WASTE IN BRITISH COLUMBIA – NON-RESIDENTIAL PACKAGING AND PAPER PRODUCTS –  
SUNSHINE COAST REGIONAL DISTRICT FEEDBACK**

The Sunshine Coast Regional District (SCRD) Board adopted the following resolution at the July 11, 2024, Board meeting:

THAT the report titled Provincial Engagement on Non-Residential Packaging and Paper Products be received for information;

AND THAT the Sunshine Coast Regional District Board send a letter to the Ministry of Environment and Climate Change Strategy in response to the engagement opportunity on Preventing Waste in British Columbia: Non-Residential Packaging and Paper Products;

AND THAT The Sunshine Coast Regional District communicate support for commercial collection of residential recycling for delivery to public depots;

AND FURTHER THAT the communication indicate concerns about the applicability of the regulations to rural and remote communities.

This letter is in response to the engagement opportunity on Preventing Waste in British Columbia – Non-Residential Packaging and Paper Products and further to the SCRD's letters dated June 28, 2019, and June 20, 2020, requesting an amendment to the BC Recycling Regulation to include industrial, commercial and institutional (ICI) or non-residential packaging and paper products (PPP).

The SCRDR reaffirms that it is in support of including non-residential PPP in the BC Recycling Regulation, including the establishment of an industry funded solution to collect, process, and recycle these materials. Furthermore, the SCRDR supports the inclusion of Non-Residential Packaging and Paper Products within the existing residential packaging and paper products program, such that non-residential users be able to access the same drop-off facilities and depots. Any amendments to the BC Recycling Regulation must also consider the applicability of the regulations to rural and remote communities to ensure equitable access to all policy outcomes.

Union of BC Municipalities (UBCM) resolutions dating back to 2018 indicate a continued need for a solution to improve the recycling and diversion of non-residential PPP in the province. To date the UBCM Resolutions Committee has endorsed six resolutions related to this, including: 2023-EB41, 2021-EB33, 2020-EB54, 2020-NR57, 2019-B146, and 2018-B68.

As stated in previous letters and past UBCM resolutions, the SCRDR reaffirms that any policy solution should hold the producers of non-residential PPP fully accountable to fund the costs of collecting, processing, and recycling all materials.

A gap appeared in the BC Recycling Regulation when it was expanded in 2014 to include PPP. The amendment included the residential sector only and the non-residential sector was excluded. This has resulted in schools, hospitals, restaurants, grocery stores, and other businesses dependent on the private sector and local governments for access to recycling. With changes in the global commodity market over the past decade, local governments and private companies are facing challenges that include reduced access to recycling for the non-residential sector. The inclusion of non-residential PPP in the BC Recycling Regulation would result in a greater economy of scale in BC and improved recycling outcomes, much as it has for residential PPP.

Regional Districts, through Solid Waste Management Plans, are required to set waste diversion targets in alignment with provincial targets. This places the burden of managing materials not included in the BC Recycling Regulation on local governments to meet these targets. Without including non-residential PPP in the BC Recycling Regulation, non-residential recyclables such as cardboard, paper, metal, plastic, and glass containers may be sent to the landfill if they are not cost effective for businesses or local governments to recycle. This gap in services delays the ability of local governments to meet diversion targets set out in Solid Waste Management Plans and provincial waste reduction targets.

Thank you for the opportunity to provide additional feedback on this issue. We respectfully ask that you enact this amendment to the BC Recycling Regulation as quickly as possible to promote a healthy and sustainable environment in our community.

Yours truly,

**SUNSHINE COAST REGIONAL DISTRICT**



Leonard Lee  
SCRD Board Chair

July 22, 2024

Preventing Waste in British Columbia Project Team  
Ministry of Environment and Climate Change Strategy  
via email: [Circularcommunities@gov.bc.ca](mailto:Circularcommunities@gov.bc.ca)

To the Preventing Waste in British Columbia project team,

**RE: Preventing Waste in British Columbia: Non-Residential Packaging & Paper Products**

The Office of the Chief Medical Health Officer of Vancouver Coastal Health (VCH) would like to express appreciation for the opportunity to provide input on the discussion paper, “*Preventing Non-Residential Packaging Waste, Including Plastic and Paper*”. This submission was prepared by VCH’s Healthy Environments & Climate Change team and Health Protection Food Safety with contributions from the Energy and Environmental Sustainability team.

Preventing non-residential waste is an important objective that aligns well with VCH’s planetary health goals, as outlined in our recent Chief Medical Health Officer’s report *Protecting Population Health in a Climate Emergency*.<sup>1</sup> Within Canada, the health sector is a major contributor to greenhouse gas emissions, contributing 4.6% of greenhouse gas emissions. Globally, this places the Canadian healthcare system amongst the most polluting health systems per capita in terms of environmental impact.<sup>1</sup> While the delivery of high-quality care in Canada contributes to climate change, the health sector itself is extremely vulnerable to its impacts.<sup>2</sup> Reducing greenhouse gas emissions through all means, including reduction of waste and wide adoption of a circular economy, is essential to climate change mitigation and protecting population health.<sup>3</sup>

Effective circular economy waste management practices in industrial, commercial, and institutional (ICI) sectors can reduce the 2 million tonnes of CO<sub>2</sub> emissions produced by B.C. landfills each year, which would also provide important health co-benefits.<sup>4</sup> Circular economy waste management and proper disposal of waste can help mitigate other harmful greenhouse gases emitted from landfills, such as methane, and prevent soil and groundwater contamination. As such, reducing and preventing non-industrial waste can directly impact air and water quality and can play a role in contributing to healthier communities with lower rates of respiratory illnesses, and other health conditions exacerbated by pollution.

In addition to the positive contributions identified above, we offer the following comments to consider regarding the prevention and recycling of non-residential waste:

**Food Safety**

Many food service establishments in B.C. have been reducing waste by using reusable materials in lieu of single-use containers to deliver or dispense their food products. The Ministry of Health, via regional health authorities, administers the *Food Premises Regulation* under the Public Health Act to ensure food safety. This regulation also outlines the sanitizing requirements for food contact surfaces, including reusable materials. Without adequate

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<sup>1</sup> Eckelman, M.J., J.D. Sherman and A.J. MacNeill. 2018. Life Cycle Environmental Emissions and Health Damages from the Canadian Healthcare System: An Economic-Environmental-Epidemiological Analysis. *PLoS Medicine* 15(7): e1002623. doi:10.1371/journal.pmed.1002623.

<sup>2</sup> IPCC, 2022: Climate Change 2022: Impacts, Adaptation and Vulnerability. Contribution of Working Group II to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change [H.-O. Pörtner, D.C. Roberts, M. Tignor, E.S. Poloczanska, K. Mintenbeck, A. Alegria, M. Craig, S. Langsdorf, S. Löschke, V. Möller, A. Okem, B. Rama (eds.)]. Cambridge University Press. Cambridge University Press, Cambridge, UK and New York, NY, USA, 3056 pp., doi:10.1017/9781009325844.

<sup>3</sup> Vancouver Coastal Health (2024). *Protecting Population Health in a Climate Emergency*. <https://www.vch.ca/sites/default/files/2024-02/vch-climate-change-health-report.pdf>

<sup>4</sup> Government of British Columbia, CleanBC (2024). *Preventing Waste in British Columbia: Non-Residential Packaging & Paper Products*. <https://engage.gov.bc.ca/app/uploads/sites/121/2024/04/Preventing-Waste-in-British-Columbia-Non-Residential-Packaging-and-Paper-Products-Discussion-Paper.pdf>



disinfection procedures in place, there is a risk of cross-contamination of these reusable materials, resulting in a higher likelihood of foodborne illness transmission to consumers.

The Ministry of Health developed a policy in 2022 on reusable food containers in food premises in B.C. which provides clarity on meeting food safety legislative requirements.<sup>5</sup> However, the current *Food Premises Regulation* does not require the installation of dishware washing equipment in food premises that use reusable materials, nor does it regulate facilities that collect reusable wares and provide dishware washing services. Thus, if a food safety issue were to arise from utilizing these dishware washing services, the liability and responsibility lie with the operator of the food premises. This highlights one of the potential challenges that operators of food premises face, complying with food safety requirements when working to reduce waste.

To ensure that the new policies do not conflict with existing food safety policies, we encourage the Ministry of Environment and Climate Change Strategy to consult those who are involved in regulating food safety, such as the Ministry of Health and regional health authorities. A collaborative and integrated approach can also help further strengthen the implementation of non-residential packaging waste policies.

### Health Care

Health care produces a high volume of single-use plastic items and less than 10% of plastics that are produced are recycled.<sup>6</sup> A significant issue in the health sector is the combined materials used in medical supplies, which needs to be separated before they can be recycled. Additionally, healthcare staff are focused on patient care, so sorting medical waste for recycling is often not a priority. To enhance sustainability and promote sustainable practices within B.C.'s health system, provincial government support for extended producer responsibility (EPR) is essential.

EPR can ensure recyclable packaging is used in Canada and closed-loop recycling is available to maximize circularity in the health sector. The waste hierarchy, consisting of prevention, reduction, reuse, recycling, and disposal, should be followed, preventing waste from entering the system where possible. Repairing and reusing items should be prioritized to extend product life cycles and reduce unnecessary extraction, production, and disposal of waste (10). Provincial leadership in service delivery, guidance, and policy in EPR will be pivotal to ensuring standardized, sustainable change and commitment to plastic waste management.

In conclusion, VCH supports the development of policies to prevent and recycle non-residential waste as an integral component of advancing public and environmental health in B.C. By fostering a circular economy, we can reduce pollution, mitigate climate change impacts, and enhance the overall health and well-being of British Columbians. We appreciate the opportunity to provide a population and public health perspective to this important initiative and look forward to continued engagement in the development of comprehensive waste prevention and recycling strategies.

Sincerely,



Dr. Brandon Yau, MD, FRCPC  
Medical Health Officer  
Vancouver Coastal Health

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<sup>5</sup> Ministry of Health. (2022). *Provincial Policy on the Use of Reusable Food Containers in Food Premises in British Columbia*.

[https://www2.gov.bc.ca/assets/gov/health/keeping-bc-healthy-safe/food-safety-security/policy\\_on\\_the\\_use\\_of\\_reusable\\_containers\\_2022\\_02.pdf](https://www2.gov.bc.ca/assets/gov/health/keeping-bc-healthy-safe/food-safety-security/policy_on_the_use_of_reusable_containers_2022_02.pdf)

<sup>6</sup> United Nations Environmental Program. Our planet is choking on plastic. Available at: Visual Feature | Beat Plastic Pollution (unep.org)



**Preventing Waste in British Columbia:**

**Non-Residential Packaging & Printed Paper Products**

Responses - District of Kitimat, July 23, 2024

**Module I – Proposed Outcomes**

Question		Answer
1	Are there any desired outcomes missing from this list?	The listed desirable outcomes for including ICI packaging & paper in the waste diversion program are complete. The District of Kitimat has a Solid Waste Management Strategy and Action Plan (SWAP) endorsed by Council in 2020 that supports the desired outcomes.
2	What outcomes are most relevant to your business, organization, or community?	The District of Kitimat is a small rural community and would like to see high priority being given to recommendations from the ICI rural and remote working group. The District is one of the communities challenged with effective management and diversion of non-residential packaging waste due to distance from major centers/markets and associated increased cost, a lack of accessible infrastructure, a lack of facilities, services and subject matter experts a lack of readily available, affordable options. One of the action items in the District’s SWAP is to maximize waste diversion (zero waste) to conserve landfill capacity. The ICI sector with increasing packaging waste is causing concern at the Kitimat Municipal Landfill.
3	How would you prioritize these outcomes?	For secondary industry and small businesses in the District of Kitimat the economic benefit for a strong circular economy is of high importance. Small volumes and long hauling distances with very little drop off or pick up opportunity are equally important with reasonable, cost-effective access and choices to engage in waste prevention and recycling options. The outcome of consistency and confidence goes hand in hand with the prevention-first approach. Waste reduction at the source i.e. double packaging of goods like box and plastic wrap or in general unnecessary or non-recyclable packaging should be restricted at the source.

4	Are there indicators or measures of success you would suggest are used to determine if an outcome is achieved or is achievable?	<p>In general, all 5 listed outcomes should lead towards less packaging and printed paper waste. As the ICI sector produces currently a higher amount of packaging and printed paper waste than the residential sector, the total volume of packaging and printed paper waste should significantly increase at the recycling facilities. With an increase in access options for the ICI sector another measurable indicator should be the number of drop off facilities, recycling hauls, and if materials enter the circular economy (reuse or repurpose) there should be a decrease in virgin material entering the system.</p> <p>In annual reports from landfills, the total amount of residual waste landfilled should decrease and waste diversion numbers should increase, potentially resulting in extended landfill capacity.</p>
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## Module II – Provincial target setting

	Question	Answer
5	Should non-residential packaging targets be the same, or better than existing residential packaging targets? Why or why not?	<p>The guiding document for residential and non-residential packaging and paper products should be equally applied. If the ICI sector achieves the 75% recovery rate outlined in the Recycling Regulation, this will potentially impact the residential recovery rate. If accountability and transparency can be established, the ICI sector can achieve prevention targets that will support the regulated recovery rate.</p> <p>Annual reporting of data for packaging and paper products (for each category volumes collected, drop-off/hauling frequency, type of packaging changed, type of packaging for reuse, any changes to engage in circular economy) should be provided similar to annual reports by product stewards.</p> <p>Using and applying the targets set out in the Recycling regulation for the residential and non-residential sector allows applying the bans equally at landfills. Alternatively, there could be a progressive approach implemented for the ICI sector that would encourage moving towards the circular economy and zero waste goal.</p>
6	What types of targets would be most useful? Reduction targets; reuse targets; recycling targets; diversion targets?	Tracking the changes in the ICI sector for packaging and paper products would require more detailed data recording and reporting. Each one of the suggested targets is useful in demonstrating change of using and handling packaging and paper products in the ICI sector. A meaningful target would require a starting point number including the number of categories used in each ICI branch.

		To support and demonstrate efforts towards meeting targets set in the Environment and Climate Change Canada (ECCC) Ocean Plastics Charter and Canada Plastics Pact 2025 Targets all of the listed targets (reduction, reuse, recycling, diversion) are important to address any potential for support in the production, recycling sector, hindering reuse factors and limitations in meeting a set diversion goal.
7	Should there be regional or business specific targets in addition to provincial targets? Why or why not?	Business specific targets for a region should be considered. This request was also brought forward for the residential sector due to the differences in rural and urban settings. There is a broad variety in businesses depending on the region. Particularly, there are regions with high impact of tourism and seasonal impact, resource-based regions with very specific businesses and more.
8	How can we measure success or progress against established targets?	In addition to the response under question 7: The District of Kitimat has implemented weigh scales and a tipping fee structure recording loads for disposal at the landfill. ICI loads are weighed, and a tonnage fee charged. Disposal fees for ICI loads should be less if higher diversion rates are achieved. The ICI sector should see a decrease in disposal fees over time. Landfills recording ICI waste categories for disposal and disposal fees should see a decrease in tonnage. Should a mixed load for ICI be recorded, this should decrease if recyclables are sorted. A measure of success could be the reduction in tonnage of landfilled refuse, reduction in mixed loads, reduction in fines for loads including recyclables.

### Module III – Supporting regional planning and local actions

	Question	Answer
9	What actions are best suited at the local, regional, or provincial level of government?	In 2023, the District of Kitimat updated its Municipal Code and introduced tipping fees based on tonnage and waste categories including ICI specific wastes. Including the ICI sector in the Recycling Regulation would support local governments like the District to amend their bylaws to introduce and set requirements for source separation, implement fines and disposal bans for packaging and paper products. Local governments can support provincial goals of waste reduction and pollution control by amending bylaws with more stringent actions if reliable and sustainable recycling opportunities for packaging and paper products can be established.

10	What factors should be taken into consideration if the Province enables or promotes local actions?	Local actions are desirable particularly given the diverse geography and business variety of communities in the province. The ICI sector would require cost-effective, consistent and sustainable diversion and recycling options in order to engage in waste diversion programs for packaging and paper products. Active engagement to find alternatives to currently used materials, reuse options of materials and viable recycling markets for ICI specific materials are important to be established prior to enabling or promoting local actions. Local waste diversion actions should consider business needs to thrive and expand.
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### Module IV – Exploring provincial policies

	Question	Answer
11	What is already working to prevent packaging waste – for businesses, institutions, haulers, local government?	<p>The District of Kitimat has successfully engaged with Recycle BC and recently expanded the contract for hauling and collecting residential PPP to include Kitimaat Village. EPR programs for diverting recyclables from residential sources are established and supported by local governments. This approach of designated recycled materials would assist the implementation of diverting PPP materials from the ICI sector.</p> <p>On a local government level bylaws could be more stringent to enforce diversion opportunities and enhance desire to reduce and reuse. Existing education efforts and existing markets could be accessed for already established material categories. Existing rules and regulation could be applied to establish a fair and equal level of waste diversion.</p>
12	Are there other actions that should be considered? What are they?	Standardized waste prevention measures like 5-year plans for each ICI sector to document waste reduction efforts should be made mandatory. Qualified local support and expertise should engage with each ICI sector to provide guidance in waste prevention options, conduct annual audits for accountability and provide consistency for businesses. Standardized local and provincial data collection based on established waste categories to assist in demonstrating the ICI sectors efforts are meeting the desired outcomes.
13	What are the benefits or limitations of these waste prevention options?	Benefits of waste prevention options are a move towards more waste reduction and pollution control. Accountability of the ICI sector to actively engage in waste reduction efforts and reporting across the province will assist to address any gaps. There is an opportunity to find more environmentally friendly

		<p>options for some packaging materials in the ICI sector and promote reduction and reuse successes within a sector. Particularly plastic wastes may find replacement, and new avenues for reuse and recycling due to greater volume of the plastics categories. Overall benefits may be reflected in transporting goods also resulting in less residential PPP.</p> <p>Limitations may be the individual ICI sectors branding, shipping/transporting and safety requirements for products. There may be resistance from the ICI sector if requirements get too stringent or are not cost-effective. If the burden on the ICI sector is too demanding in providing data and prevention plans, it may be challenging to measure outcomes other than from landfills in terms of waste disposal reduction from the ICI sector.</p>
14	<p>How ready are organizations, businesses, governments to implement?</p>	<p>Residential EPR programs are well established in BC and the residential PPP program is well known. Organizations, businesses and governments submitted multiple resolutions to UBCM due to the lack of packaging and paper products from the ICI sector not being included in the Recycling Regulation. There is a tremendous opportunity for local governments to increase waste diversion.</p> <p>Organizations and businesses are ready to implement PPP diversion programs. Some have already successfully implemented waste diversion programs (i.e. London Drugs). The challenge will be the variety and bulk of materials of the ICI sector and finding cost-effective and sustainable markets to progressively and continuously implement programs.</p>
15	<p>How should implementation be prioritized?</p>	<p>Implementation of packaging and paper products for the ICI sector should follow the residential PPP program implementation. If there are already markets for established PPP commodities there may be a greater chance for buy-in. As it is for residential PPP, producers should be responsible for the program and costs associated with collection, hauling, recycling and end-markets.</p> <p>Within a 5-year implementation plan new commodities should be implemented and new markets, reuse options and reduction potential established.</p> <p>Implementation of the packaging and paper program should in most parts mimic the residential EPR program implementation.</p>

## Module V – EPR approaches to address non-residential packaging

	Question	Answer
16	What are the benefits or limitations of expanded EPR options?	<p>The benefits of EPR programs are that producers of designated products are responsible for the lifecycle of their products including collection and recycling. This approach of EPR shifts responsibility from local governments, First Nations and taxpayers to producers and consumers. Under this concept producers would be required to track and report on their materials in annual reports. Limitations for an extended EPR program would be the diversity of the ICI sector with additional volumes and packaging products. Some sectors do have established return-it programs and recycling markets. It would be challenging to incorporate all categories and receive buy-in from all sectors.</p> <p>Consideration to funding/financial support by ICI organizations especially in smaller, remote or northern locations, to ensure costs to local governments are minimized. For example, ensuring that Recycle BC recoveries are sufficient, stable, and inclusive.</p> <p>Small, remote and northern communities with EPR programs should have access to a consolidated site for collection (and distribution). With lower volumes and longer distances, consolidating streams with other communities will be more cost effective.</p>
17	How ready are organizations, businesses, and governments to implement an expanded form of EPR?	See response provided by District of Kitimat in Module IV, question 14.
18	Are there sectors or materials that should be prioritized to be included or excluded?	See response provided by District of Kitimat in Module IV, question 15
19	How should implementation of EPR actions be prioritized (e.g. by sector, by material, by geographic location)?	<p>Expanding on the response from question 15 in Module 5, a 5-year plan should be a guidance document provided by each sector outlining success, efforts to increase waste diversion, reduction of recyclables and reuse efforts. The plan should outline a commodity to be considered for inclusion in diversion efforts for each year. Implementation of an extended EPR program should mimic the implementation of the existing residential PPP. Focus should be by sector producing the most packaging and paper products, and by material with the highest percentage and diversion potential. Geography shouldn't be considered a factor in determining participation. However, it must be considered in the sense that rural, small, or northern communities may have lower volumes and larger distances to commute recyclables.</p>

July 3, 2024

**Subject: BCAC Submission on Preventing Waste Outside the Home**

To Whom It May Concern,

Thank you for the opportunity to contribute feedback from the agriculture sector in response to the Ministry of Environment and Climate Change Strategy's recent discussion paper titled *Preventing Waste in British Columbia: Non-Residential Packaging & Paper Products*. BC Agriculture Council (BCAC) recognizes that this is an important part of delivering on the Government of British Columbia's commitment to reduce single-use and plastic waste in our communities.

BCAC's mission is to grow a strong, sustainable and competitive agriculture sector through building industry consensus and advancing public policy. We achieve this by delivering a unified voice to government through the 30 unique commodity associations that we represent. In turn, our member associations represent some 20,000 farm families from across our province, generating approximately 96% of provincial farm gate sales in B.C.

Our province's farmers and ranchers have faced unprecedented challenges in recent years regarding the affordability and availability of inputs critical to agricultural production. This has included fertilizer costs in many regions of B.C. more than doubling in a single year, as well as 40 to 50% increases in farm equipment prices, costs for crop protection products growing by 30 to 40%, and more. These increases have been due to a range of factors beyond the influence of individual farmers, such as disruptions to global supply chains, climate change, the COVID-19 pandemic, high interest rates, and high inflation.

Due to the long-term nature of the supply contracts between agricultural producers and retailers, it has largely not been possible for farmers to pass these increased costs on to consumers and the resultant narrowing of profit margins is threatening the financial viability of farming in many areas of the province. Based on Statistics Canada's return-on-assets ratio, B.C. is the second least profitable province in which to farm as of 2023. In some cases, farmers have been unable to generate revenues let alone profits because of extreme weather events, as demonstrated by the January 2024 cold snap that devastated the production of many kinds of tree fruits and grapes in the Okanagan region.

As such, it is vital that any application of the extended producer responsibility (EPR) concept to agricultural packaging waste in our province, such as through Cleanfarms regulated programs as contemplated in Table 4 of the discussion paper, is matched with funding commitments from the Government of B.C. so as to ensure that farmers do not face further increases in the material costs of those goods essential to growing the food that B.C. communities need. Even regulated programs that are local or regional in scope and focus on highly specific types of packaging waste, such as grain bags or baling twine, will have development costs associated and very few farmers at this time can afford to contribute toward the development of these programs through further input price increases and fees.

It is also unclear how consumers would bear the costs associated with the application of EPR more generally and to what extent the Government of B.C. has considered the potential impacts this may have on our province's marginalized individuals and families. In a 2021 study of EPR's potential impact in Ontario, titled "Modeling impact on consumer-packaged goods pricing resulting from an increase in the stewardship obligation," Dr. Calvin Lekhan (Faculty of Environmental Studies, York University) estimated



that most grocery bills would grow by 6 to 10%. This increase would come from other food system partners – retailers, processors, and shippers, for example – as they seek to offset the costs associated with implementing EPR, rather than from farmers and ranchers. Nonetheless, new and significant increases in British Columbians’ grocery bills may negatively impact their confidence in the province’s food system.

Further, it is important to note that voluntary programs are already successfully implemented in B.C. with support from Cleanfarms, including for unwanted or outdated livestock medication and crop protection products as well as empty totes, drums, and containers that can hold volumes of 23 litres or less. Pilot programs are in progress in a few communities in B.C. to collect baling twine, bale wrap, silage plastic, and grain bags, also with support from Cleanfarms. Wherever possible, voluntary programs like these should be favoured in B.C. as farmers may prefer to reuse or repurpose packaging, which is a more effective approach to waste reduction than recycling, and regulated programs may be unfeasible in some regions due to a wide range of factors, which can include but are by no means limited to the geographic diffusion of farm operations within the region, the diversity of the commodities grown and types of packaging used, and the geographic distance between farm operations and collection sites.

Finally, to ensure the success of any new or expanded programs, the Government of B.C. must also be prepared to commit resources toward raising awareness of those programs as well as their potential benefits to farmers and the environment. Among agricultural producers, there is uneven awareness of the voluntary programs implemented with support from Cleanfarms in part because the programs are regional in scope or are specific to only a few types of farm operations. Material recovery can be maximized if end users of various forms of packaging understand the value of participating in recycling and recovery programs, and an effective method of achieving buy-in among agricultural producers could be to clearly communicate how much farmers could save in landfill fees from participation in programs like those supported by Cleanfarms.

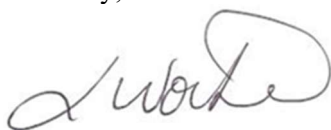
To briefly summarize, our recommendations in response to the Ministry’s discussion paper on non-residential packaging and paper products are:

- Favour voluntary programs wherever possible to account for feasibility gaps in waste collection;
- Commit financial resources from the Government of B.C. to offset the development costs of any new or expanded programs related to agricultural packaging; and,
- Clearly communicate to farmers and ranchers the public service good and potential financial savings that can be achieved through any new or expanded programs.

If you might require any additional information or details regarding the points we have raised here or other aspects of packaging waste handling in the agriculture sector’s context, please do not hesitate to contact Danielle Synotte, BCAC’s Executive Director, via email at [dsynotte@bcac.ca](mailto:dsynotte@bcac.ca) or via telephone at 604-854-4483.

Thank you once again for the Ministry’s commitment to consult on this important topic and complex policy issue. We look forward to further opportunities to contribute the perspectives of farmers and ranchers, and we appreciate any collaboration that can advance the sustainability of agriculture in B.C., including the economic, social, and environmental pillars of that sustainability.

Sincerely,



Jennifer Woike, President  
BC Agriculture Council



# TOWN OF GIBSONS

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## OFFICE OF THE MAYOR | SILAS WHITE

July 17, 2024

Delivered via email: [circularcommunities@gov.bc.ca](mailto:circularcommunities@gov.bc.ca)

Dear Circular Communities,

### **Re: Support for Advancing Prevention, Regulation, and Recycling of Non-Residential Packaging and Plastics in BC**

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I am writing on behalf of the Town of Gibsons to strongly support the advancement of prevention, regulation and recycling of non-residential packaging and plastics in BC. As a small community outside of the Lower Mainland, we appreciate the focus on making this work in Rural and Remote communities

A particular nuance of our small community is that we've had long-standing high participation in our Recycle BC depot drop-off program at the Gibsons Recycling Depot. Residents from our neighbouring rural areas, F, E and D, also rely on the depot program because, like the Town, they have not signed up for the Recycle BC Home Collection program. The reason for this choice is clear: the Town and our neighbours value the effectiveness of the depot program. The diversion rate, and especially the contamination rate, are significantly better through the depot program. The contamination rate, consistently, comes in much lower than the contamination rates of curbside collection in neighbouring communities.

Therefore, our community has little interest in going backwards and increasing our contamination rate via curbside collection.

That said, we are concerned that the farther residents live from our depot, especially in the electoral areas, the less likely they are to use it. While the Sunshine Coast Regional District (SCRD) has a landfill ban on recyclables, the ban is not currently enforced.

Furthermore, we are concerned about the implications of our community's growth, and aging population. Newcomers accustomed to curbside collection in the Lower Mainland, especially, want the same service here and are not embracing depot drop-off the way that long-time residents have. Additionally, our growing senior population may have a harder time doing their own recycling and prefer to hire assistance. Thirdly, as we promote higher-density housing, and the increased use of transit and active transportation options for the future, the need for a vehicle to access the depot becomes a significant barrier.

Therefore, as we've communicated to the Ministry of Environment on multiple occasions in the past (including through the SCRD), our top priority in this process is to allow private, subscription-based collection businesses to transport residential recycling from residents' homes to our public Recycle BC depot. This recycling should continue to be considered part of our depot's residential tonnage since it

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### TOWN OF GIBSONS

*"Nature is our most valuable asset"*

originates from private households, rather than being categorized and charged as “commercial” simply because a private company is involved in the transport.

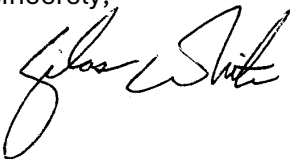
Secondly, perhaps more directly relevant to the proposed expansion to non-residential, we also strongly support private collection of non-residential waste rather than limiting this collection to the public Recycle BC collection program that can only be administered universally by local governments. It is unrealistic to expect our private businesses or institutions to use our depot without assistance from private collection companies. Additionally, our community is not inclined to institute public curbside collection simply because non-residential packaging is added to the Recycle BC.

Finally, when we talk about a “circular economy,” in our small community this implies that small businesses should have entrepreneurial opportunities. On the Sunshine Coast, we have had many small businesses and local employment opportunities come and go with hopes of participating in the circular economy, only to be dashed by the current restriction to local government-administered Recycle BC universal curbside collection.

As your information session correctly states, “No one solution will solve the waste management challenge for non-residential packaging.” This especially applies to ensuring there are different solutions available for the variety of communities in BC. In Gibsons, our best and clearest path to zero waste is to protect and maintain our depot drop-off program, supplemented by private collection companies that can deliver recycling from both residential and non-residential clients in our community.

If this model is supported by the Circular Communities process, we have no doubt we can influence our regional district to enforce the landfill ban on recycling and make the most progress on waste diversion that our community will have seen in close to ten years, when we instituted organic waste collection. Unfortunately, we have been somewhat stalled since then, and we are keen to do better. Thank you for continuing to move the needle forward; we hope you can be true to the edict that “no one solution” will solve the challenge and allow private collection to be accepted in coordination with depots.

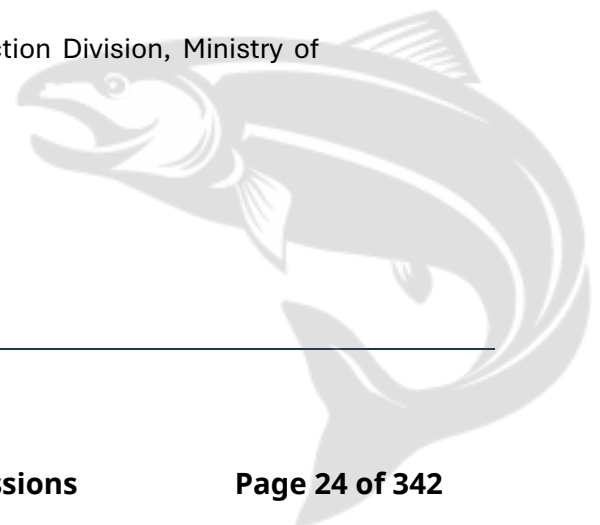
Sincerely,



Silas White  
Mayor, Town of Gibsons

Cc: Minister of the Environment

Laurel Nash, Assistant Deputy Minister, Environmental Protection Division, Ministry of Environment and Climate Change Strategy  
Sunshine Coast Regional District





July 18, 2024

The Ministry of Environment and Climate Change Strategy  
PO Box 9360 Stn Prov Govt  
Victoria, BC V8W 9M2

Dear Minister:

**RE: RDCK Response to Preventing Waste in British Columbia, Non-Residential Packaging and Paper Products Discussion Paper**

Thank you for providing this opportunity for the Regional District of Central Kootenay (RDCK) to respond to the Ministry of Environment and Climate Change Strategy's (Ministry) Preventing Waste in British Columbia, Non-Residential Packaging and Paper Products Discussion Paper.

The RDCK's Resource Recovery Plan (RRP or Solid Waste Management Plan) was approved by the Ministry in August 2021. In the RRP, the RDCK has included several strategies to drive the reduction of the RDCK's disposal rate from 490 kg to 350 kg per capita by 2030, which also aligns with the Ministry's provincial target disposal rate.

In 2020, the RDCK joined Recycle BC's program for Residential packaging and paper products (PPP) recycling, which excluded Non-Residential materials from the collection system at 22 recycling depots throughout the RDCK. Due to the high cost and limited recycling options for private recycling services in our district, the RDCK established separate recycling bins for Industrial, Commercial, and Institutional (ICI) Old Corrugated Cardboards (OCC) at 8 designated depots across the RDCK. Unfortunately, the program was limited to OCC only due to the astronomical cost to expand the service to other recyclable materials. The ICI OCC recycling service has been well used by many ICI users; however, it has been a significant cost for the RDCK to support ICI recycling in a separate system. In 2023, close to \$220,000 was spent towards ICI OCC recycling hauling expenses alone. Still many ICI sector waste generators in the RDCK have significant hurdles to diverting recyclable materials from our landfills.

In 2023, the RDCK conducted waste composition study at Creston and Ootischenia Landfills. It is estimated that 48% of the waste disposed in the RDCK comes from ICI sectors. ICI garbage was composed of paper (18%), plastic (14%), metal 4%, glass 2%, and various other non-PPP related materials (62%). While these specific material streams would also contain non-PPP materials, the paper and plastics categories each had approximately 10% PPP-type materials. Meaning a significant volume of materials in the RDCK's waste stream could be diverted through a Non-Residential PPP program.

The results from the RDCK's waste composition study and the costs associated with a separate stream ICI OCC recycling are clear indicators that current ICI recycling is not sufficient and sustainable. It is necessary to consider more sustainable and cost-effective approaches to prevent recyclable ICI PPP from being disposed of in landfills and achieve both provincial and regional waste reduction targets.

The RDCK has been aware of significant challenges for ICI sectors to participate in recycling. Most of ICI sectors in the RDCK are required to coordinate their own recycling options, however the costs and accessibility for recycling are the greatest challenges for them. Many small local business report the cost for private recycling services is prohibitive, especially when they produce low volumes. A lack of service providers available in the area is significant challenge for many of our rural communities. Some areas simply do not have services and even in our larger communities loose flexible plastic categories, styrofoam materials and glass collection are not available.

The RDCK appreciates and supports the key desired policy outcomes and relevant potential policy approaches in the Discussion Paper. While all the outcomes are valuable, those most relevant to the RDCK include: 'Access', 'Consistency and confidence', and 'Accountability and transparency'. Ensuring that businesses and organizations have access to cost-effective choices of PPP recycling services and securing certainty that the services are available in communities throughout the province need to be prioritized. After these outcomes are achieved, the RDCK would like to see 'Accountability and transparency' from ICI sectors towards their waste management and reduction efforts and results from the remaining outcomes. The Ministry could require businesses and institutions that generate large volumes of waste to submit waste prevention plans. The RDCK may consider imposing mandatory requirements for ICI sectors to divert recyclables through our bylaw - if there are cost effective, accessible, and consistent recycling options available at the local level. Currently the RDCK is doubling the applicable tipping fee for the load containing more than 10% recyclable materials in the Resource Recovery Facilities Regulatory Bylaw, aiming to incentivize the ICI sector to recycle through our tipping fee structure. However, this approach has not been strong enough to hold ICI sectors accountable for their recycling effort, especially with the lack of accessible and affordable recycling services available to them. It is necessary for the Ministry to ensure that the provincial regulations are enacted only after both the Ministry and the local government secure availability of alternative feasible recycling solutions to ICI sectors.

Diversion and recycling targets should be regional, as BC-wide targets can be met in larger municipalities where recycling services as more readily available and cost effective. Success can be measured through waste composition studies, waste audits for specific Non-Residential PPP producers or sectors, and data from annual landfill reports to measure diversion rates compared with previous years.

Currently the ICI sector is comprised of light industrial sources (agricultural, manufacturing and jobsites), businesses (retail stores, tourism, and restaurants) and institutions (hospitals, schools, universities etc.), and non-profits organizations. Each ICI source produces diverse and specific sources of highly recyclable waste. Therefore, it would be best to separate the ICI sector into different categories depending on what type of waste they produce. For instance, agricultural industry and institutions generate completely different types of recyclable waste, however they are currently classified under the same 'ICI waste' category. This is preventing opportunities to include some easily recyclable Non-Residential PPP under Recycling Regulation and manage them through existing Extended Producer Responsibility (EPR) programs. Some businesses and institutions generate very similar waste as Residential PPP such as cardboard, paper, and packaging wraps (flexible plastic), packaging styrofoam, and packaging containers.

'Business to Customer packaging' products, especially generated from businesses, institutions as well as non-profit organizations, are equivalent to that of Residential PPP and these can be included in existing EPR program. Recycle BC, a well-established EPR program managing Residential PPP has two Material Recovery Facilities in lower mainland, which collect and sort all their program products collected throughout British Columbia for both Residential and ICI sectors. Recycle BC has made a significant contribution to waste diversion in the past 10 years since the launch of their service, achieving over 86.2% recovery rate in 2022. The RDCK was allocated 12 primary depots and added 10 satellite depots to support the service accessibility in some rural

communities. Recycle BC's primary depots accept mixed container, mixed fibre, glass as well as flexible plastics and styrofoam categories. Small institutions and businesses should be able to access their local primary depots immediately. However, it also needs to be considered if Recycle BC's post-collection partner(s) can handle providing more frequent services to haul increased volume of PPP at each depot to mitigate service interruptions. For larger institutions and businesses who will require their own recycling bins on site due to larger volume of PPP, Recycle BC could approach them independently, and provide direct hauling service through their post collection partner(s).

'Business to Business Packaging' products such as large format food packaging, agricultural packaging, and medical packaging waste, construction packaging should be included in a separate EPR program(s) as these items will not be suited for Recycle BC's existing processing system. Some ICI may produce both Business to Customer and Business to Business packaging products, so combination of expansion of existing EPR (i.e., Recycle BC) and managing through new EPR program(s) will be best suited solution.

Thank you again for this opportunity to provide a formal response to the Discussion Paper. It is certainly a complex issue to manage Non-Residential PPP recycling. We hope this public engagement provides the Ministry with broader inputs from every possible public sector and helps the Ministry implement desired approaches towards prevention of waste from Non-Residential sectors. The RDCK will be willing to participate in any other opportunities to provide further information to the Ministry if it is required.

Sincerely,



Aimee Watson  
RDCK Board Chair

AW/an

cc: Stuart Horn, RDCK Chief Administrative Officer  
Uli Wolf, RDCK General Manager of Environmental Services



# REGIONAL DISTRICT NORTH OKANAGAN

## MEMBER MUNICIPALITIES:

CITY OF ARMSTRONG  
CITY OF ENDERBY  
DISTRICT OF COLDSTREAM  
VILLAGE OF LUMBY  
CITY OF VERNON  
TOWNSHIP OF SPALLUMCHEEN

## ELECTORAL AREAS:

"B" – SWAN LAKE  
"C" – BX DISTRICT  
"D" – LUMBY (RURAL)  
"E" – CHERRYVILLE  
"F" – ENDERBY (RURAL)

OFFICE OF: COMMUNITY AND STRATEGIC SERVICES

OUR FILE No.: 4900.04.19

July 16, 2024

## VIA EMAIL

British Columbia Ministry of Environment and Climate Change Strategy  
circularcommunities@gov.bc.ca

### **Re: Preventing Waste in British Columbia – Non-Residential Packaging & Paper Products Discussion Paper**

Thank you for providing the Regional District of North Okanagan (RDNO) the opportunity to provide feedback on the *Preventing Waste in British Columbia: Non-Residential Packaging and Paper Products Discussion Paper*. The feedback provided here is on behalf of RDNO Solid Waste Management Staff (RDNOSWMS) and may not necessarily reflect the views of the RDNO Board of Directors.

RDNO Solid Waste Management Staff (RDNOSWMS) encourages the province to prioritize ongoing expansion of Extended Producer Responsibility (EPR) for Non-Residential Packaging & Paper Products (NRPPP). EPR can be a comprehensive provincewide solution to address Packaging and Paper Product (PPP) waste at all levels of the pollution prevention hierarchy by:

- Providing convenient and consistent provincewide collection services.
- Catalyzing expanded recycling infrastructure and a circular economy.
- Encouraging systems that utilize materials more efficiently.

Currently there is inconsistency in recycling programs between various sectors for the same or similar types of materials. A cardboard box is a cardboard box, regardless of where it comes from. However, currently single-family households with Recycle BC service can easily put a cardboard box out for free EPR funded curbside recycling, whereas a business and often many multi-family owners or residents incur costs to manage that same cardboard box. The situation becomes even more complex and confusing for other PPP materials such as plastic containers and plastic film. There is a pressing need to harmonize recycling systems across all sectors based on the type of product or material, rather than the nature of the premise generating the recyclable material. The current differentiation between the residential sector and the industrial, commercial and institutional (ICI) sector is somewhat ambiguous and impacts overall efficiencies and collection rates.

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Harmonization of PPP EPR across all sectors will provide more consistency in recycling collection and processing infrastructure and will increase confidence and participation in recycling programs. Local governments that operate waste management facilities will then be better equipped to develop and enforce bylaws that regulate packaging and paper products (PPP) from entering our landfills, regardless of source.

In spite of waste reduction efforts in the North Okanagan within all sectors, the total quantity of paper and plastic entering our landfills is very concerning. In the most recent waste composition study completed at Greater Vernon Diversion & Disposal Facility in 2022, plastic and paper made a combined 25% of total waste landfilled during the study period. From the ICI sector the proportion landfilled material that was paper was 81% higher and for plastic was 44% higher compared to the single-family sector. These findings highlight a clear difference in materials handled in a non-EPR system (ICI) compared to an EPR system (single family) and demonstrate further need to consider an expansion of EPR for PPP to the ICI sector.

EPR systems should put full product lifecycle costs including collection and recycling into the costs of the product so that these total costs are paid for up front by the producer or the consumer. This up-front payment would ensure that free collection of materials (including bins), as well as the transport and recycling of these materials, is fully funded. These upfront costs can also inform producers and consumers of the true lifecycle costs of PPP materials and can also incentivize them to consider and innovate reduction and reuse alternatives for PPP materials.

The following sections contain questions (in bold text) from the *Preventing Waste in British Columbia: Non-Residential Packaging & Paper Products Discussion Paper*. RDNOSWMS responses to these questions are provided.

## **PROPOSED OUTCOMES (questions from page 17)**

### **1. Are there any desired outcomes missing from this list?**

*The following desired outcome is missing from the list on page 17 of the discussion paper:*

*“Reduce disposal costs (financial and environmental) for industry, local governments and taxpayers and reduce the amount of PPP that ends up disposed in landfills.”*

### **2. What outcomes are most relevant to your business, organization, or community?**

*The outcome most relevant is the missing desired outcome: “Reduce disposal costs (financial and environmental) for industry, local governments and taxpayers and reduce the amount of PPP the ends up disposed in landfills.” The other stated most relevant outcomes are:*

- *Prevention-first approach*
- *Maximize material recovery*
- *Accountability and transparency*

*Ultimately improved management of NRPPP will place less pressure on solid waste management facilities operated by local governments. Managing materials at the highest levels of the pollution prevention hierarchy can then be assumed and paid for by the producers and consumers of NRPPP when products are produced and purchased.*



### 3. How would you prioritize these outcomes?

*RDNOSWMS would prioritize the outcomes in quotation marks with the ranked footnote below in the order they are referenced but also recognizes they are all interrelated:*

*“Reduce disposal costs (financial and environmental) for industry, local governments and taxpayers and reduce the amount of PPP that ends up disposed in landfills.”<sup>1</sup>.*

*“This would be achieved by systems that encourage a “Prevention-first approach”<sup>2</sup> and “Maximize material recovery”<sup>3</sup>*

*Three fundamental pillars of a system that support the above outcomes would be:*

- *“Accountability and transparency”<sup>4</sup>*
- *“Access”<sup>5</sup>*
- *“Consistency and confidence”<sup>6</sup>*

*On a provincial scale these three fundamental pillars should be achieved by EPR.*

*A naturally evolving outcome from the above outcomes functioning successfully would be: “Economic benefits for a strong circular economy”<sup>7</sup>.*

### 4. Are there indicators or measures of success you would suggest are used to determine if an outcome is achieved or is achievable?

*RDNOSWMS believe that a provincewide EPR system for NRPPPs would provide indicators and measures of success for each outcome as follows:*

- *Prevention-first approach: Material fees collected by respective NRPPP EPR organizations would help reflect the true full lifecycle cost of PPP and could encourage reduction in the quantities of NRPPP materials produced.*
- *Consistency and confidence: Achieved by a standardized provincewide EPR funded recycling system. Recycle BC is an example for residential packaging and paper products.*
- *Accountability and transparency: Collection targets could be set for industry in a dedicated NRPPP EPR plan and progress documented and verified in annual reporting.*
- *Access: Provincewide accessibility standards for NRPPP collection could be set in a NRPPP EPR plan.*
- *Economic benefits for a strong circular economy: Progress could be reported as a component part of NRPPP EPR annual reporting.*
- *Maximize material recovery: Material recovery rates reported annually in a provincial EPR report for NRPPP or perhaps one organization representing all PPP.*

## **OPPORTUNITIES (questions from page 19)**

- 5. Should non-residential packaging targets be the same, or better than existing residential packaging targets? Why or why not?**

*Non-residential packaging targets should be the same as residential packaging targets. The focus should be on the type of material being reduced, reused or recycled, rather than on the sector from which it originates. This is reflected in the national targets outlined on page 19 of the discussion paper which do not specify residential or non-residential but are based on a type of material (plastic).*

- 6. What types of targets would be most useful? Reduction target; reuse targets; recycling targets; diversion targets?**

*Because it is at the highest level of the pollution prevention hierarchy, the reduction target would be the most useful and important target. However, the target would depend on the type of product or material involved. For instance, reduction targets would be more applicable to print materials and single-use items, whereas reuse targets would be more applicable to refillable drums, pallets, crates, cutlery and dishware and recycling targets could be more applicable in circumstances where reduction and reuse are less feasible.*

*Diversion targets have the disadvantage of not specifying the level of the pollution prevention achieved. For instance, it is likely not desirable to have more pallets or drums recycled if they could have been reused. However, diversion targets could provide an overall metric for how much materials are being kept out of landfills by communicating the aggregate of reduction, reuse and recycling targets.*

- 7. Should there be regional or business specific targets in addition to provincial targets? Why or why not?**

*The priority needs to be on the types of materials involved, rather than the type of business producing the material to encourage a consistent provincewide waste reduction system for NRPPP. A provincewide EPR program for NRPPP or PPP for all sectors would work to achieve provincial targets based on the type of materials.*

- 8. How can we measure success or progress against established targets?**

*Recycle BC has been measuring progress against established provincially regulated targets for residential PPP and publishing this information in their annual reports. This approach could also be taken for NRPPP. This process could also involve reporting the amount of product collected in each regional district as stipulated in the Recycling Regulation.*

## **SUPPORTING REGIONAL PLANNING AND LOCAL ACTIONS (questions from page 20)**

- 9. What actions are best suited at the local, regional or provincial level of government?**

*Provincial governments are best suited for establishing the higher-level regulatory framework that engages industry on a provincewide basis to reduce NRPPP waste. This could be by regulating businesses to prevent the sale and distribution of certain products and through*

provincial recycling regulation. Amending BC Recycling Regulation to include PPP from the ICI sector would require industry to establish EPR that would encompass NRPPP.

Local and regional governments could then support provincial leadership on NRPPP by adapting their respective bylaws, solid waste management planning and service levels as needed for their region.

#### **10. What factors should be taken into consideration if the Province enables or promotes local action?**

*Municipal and regional governments have varying levels of involvement in operation of solid waste management collection programs and facilities. For instance, some regional districts operate landfills, while in other regions a municipality may operate a landfill. The same variability applies with collection services. Also, local governments have varying levels of involvement in EPR, which can be very confusing for the public. With these differences in regional and local involvement, there can be varying approaches to waste reduction measures and local regulation. For instance, if a regional government does not operate a landfill there are substantial barriers to regulating materials for that landfill.*

*If the province enables or promotes local action, a primary concern is that local action may become an inconsistent patchwork of potentially confusing bylaws, regulations and programs. For instance, there are numerous municipalities that have adopted single-use product bylaws but there are also many who have not. In some cases, neighbouring municipalities have very different regulations. This results in confusion for both businesses and residents. Therefore, it is much more productive to have consistent provincewide regulation and enforcement - a "level playing field" on a provincial basis. Local governments could support these provincial regulations with locally focused education and outreach.*

*The Province could work effectively with local governments by regulating products at a provincial level and facilitating the establishment of EPR collection systems. This would better enable local action where local governments would be more equipped to consistently regulate the disposal of EPR products in their jurisdictions and inform the public of waste reduction options.*

*There should not be additional barriers to local governments for bylaw amendments requiring provincial approval, when it comes to amendments intended to support waste diversion and provincial waste reduction goals.*

### **EXPLORING PROVINCIAL POLICIES (questions from page 22)**

#### **11. What is already working to prevent packaging waste – for businesses, institutions, haulers, local governments?**

*Implementing and enforcing disposal bans or charging customers who choose to dispose of recyclable materials higher fees can encourage waste diversion where accessible recycling solutions exist. The RDNO has defined Recyclable Commercial Cardboard as a Regulated Material, where higher fees are charged when disposed loads contain Regulated Material. Accessible recycling infrastructure needs to be in place as enforcement of disposal bans or collection of higher (punitive) fees can be challenging for local governments.*

*Industry-led initiatives for reusable drink/dinnerware reduce single-use waste at these businesses. Having this standardized across the province could result in a cultural shift away from single-use.*

*As a result of single-use regulation, businesses are now reusing cardboard packing boxes to provide customers with a carry out option that replaces bags. Harmonizing residential and NRPPP recycling programs would ensure that the recycling of products that cross the stream from non-residential to residential are appropriately funded.*

## **12. Are there other actions that should be considered? What are they?**

*Widespread, convenient access to infrastructure for collecting and processing NRPPP is needed. There must be a level playing field for residential and non-residential PPP. Businesses should have an incentive of lower costs and convenient access to recycling infrastructure. This would be achieved through funding of recycling costs upfront through EPR for all sectors.*

## **13. What are the benefits or limitations of these waste prevention options?**

*Waste prevention options should be clearly defined and consistent throughout the province. If not, the result will be confusing recycling systems that have limited credibility and uptake by users.*

*A clear and consistent recycling system (a “level playing field”) is likely most achievable through provincewide EPR.*

*Industry-led initiatives such as reusable drink/dinnerware have limitations when they are specific and branded to one particular business or company. For instance, a user of a reusable mug branded by Company A may not be able to use the mug at Company B. Provincewide standards to encourage use of reusable items across a wide range of establishments should be considered. Perhaps there is opportunity for a NRPPP EPR program to administer a provincewide reusable drink/dinnerware program as a pilot project to determine its waste reduction potential.*

## **14. How ready are organizations, businesses, government to implement?**

*Change would need to be initiated by the provincial government and reasonable implementation periods would need to be established for industry associations, businesses and organizations.*

*A provincewide EPR program for NRPPP will require an amendment to BC Recycling Regulation. The province would then need to provide an implementation period for the establishment of respective stewardship agencies and plans for PPP. Businesses and organizations would then require an implementation period to consider current contracts and to implement the EPR services funded by the respective stewardship agencies.*

## **15. How should implementation be prioritized?**

*An initial priority should be amending BC Recycling Regulation to remove a sector-specific reference for packaging and paper products. This is found in “Part 2 – Extended Producer Responsibility Plans” that specifies: “with respect to the packaging and paper product 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.”

*BC Recycling Regulation should apply to all packaging and paper products.*

*Upon amending the Recycling Regulation, the producers of all PPP would be required to establish stewardship plans for collecting and managing PPP based on the type of product, rather than the perceived sector it is used in.*

## **EXTENDED PRODUCER RESPONSIBILITY PROGRAMS (questions from page 24)**

### **16. What are the benefits or limitations of expanded EPR options?**

*Some of the benefits of expanded EPR options were initially mentioned in the answer to discussion question #4 in this response which are as follows:*

- *Prevention-first approach: Material fees collected by respective NRPPP EPR organizations would help reflect the true full lifecycle cost of PPP and could encourage reduction in the quantities of NRPPP materials produced.*
- *Consistency and confidence: Achieved by a standardized provincewide EPR funded recycling system. Recycle BC is an example for residential packaging and paper products.*
- *Accountability and transparency: Collection targets could be set for industry in a dedicated NRPPP EPR plan and progress documented and verified in annual reporting.*
- *Access: Provincewide accessibility standards for NRPPP collection could be set in a NRPPP EPR plan.*
- *Economic benefits for a strong circular economy: Progress could be reported as a component part of NRPPP EPR annual reporting.*
- *Maximize material recovery: Material recovery rates reported annually in a provincial EPR report for NRPPP or perhaps one organization representing all PPP.*

*There is a further benefit realized by shifting the EPR status of PPP based on the type of product rather than the sector from which it comes, which is the current gap in multi-family residential PPP recycling. Multi-family residential properties are currently not adequately served by the Recycle BC program and incur costs for collection (bin rentals costs, tipping fees, contamination surcharges) of residential PPP. Many multi-family residents do not have the equal access to PPP recycling as single-family households. There are clearly differences between multi-family and single-family residences, however comparable access to PPP recycling should be a top priority.*

*Commercial haulers may end up operating under different regulatory regimes and may face different market conditions with expanded EPR options. For instance, rather than being in a position to charge their customer directly, they would receive incentives for the materials they collect from the respective stewardship agency for NRPPP. Considerations would need to be made by respective stewardship agencies for their relationships with commercial haulers.*

**17. How ready are organizations, businesses, and governments to implement an expanded form of EPR?**

*Ultimately the provincial government needs to be ready to amend BC Recycling Regulation and then establish timelines for industry to be compliant. Timelines applied for other past EPR programs should be considered to ensure all stakeholders are ready.*

*A much-impacted stakeholder would be commercial haulers that provide recycling collection services. These companies would need to adapt their business models to service EPR collection requirements.*

*When properly designed and implemented, EPR programs should be financially sustainable and have the capacity to operate independently in the private sector. EPR programs should not be subsidized by local governments. Local government should only be involved in EPR programs if they so choose, and any and all costs incurred by local governments to be involved in EPR programs must be fully reimbursed by the EPR program.*

**18. Are there sectors or materials that should be prioritized to be included or excluded?**

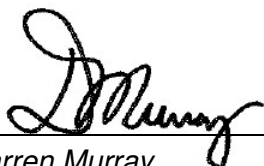
*The priority should be based on the type of material, rather than sector. PPP collection and recycling should be consistent across all sectors. The most ubiquitous materials in circulation across all sectors should be prioritized. Some examples would include corrugated cardboard, mixed paper, plastic film and containers. There is still a lot of “low hanging fruit” that is not currently being captured that would be captured under well designed and implemented EPR programs.*

**19. How should implementation of EPR actions be prioritized (e.g. by sector, by material, by geographic location)?**

*EPR actions should be prioritized by material to harmonize recycling collection and processing systems across all sectors. Although this should be a provincewide initiative, initial efforts should be made to maximize recovery in larger commercial centres.*

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Submitted by:



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Reviewed and endorsed by:



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July 15, 2024

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Environmental Policy & Initiatives Branch  
Ministry of Environment and Climate Change Strategy

**Re: Feedback on BC Ministry of Environment Discussion Paper – Non-Residential Packaging & Printed Paper Products**

Dear Circular Communities Team,

I hope this message finds you well. I am writing to provide feedback on the BC Ministry of Environment (MOECCS) discussion paper regarding the management of non-residential packaging and printed paper generated from Industrial, Commercial, and Institutional sources (ICI PPP). This response aims to contribute ideas and input for developing policy approaches to enhance the prevention and recycling of ICI PPP waste in BC.

**Background:**

The BC Ministry of Environment(MOECCS) released a discussion paper regarding management of non-residential packaging and printed paper generated from Industrial, Commercial and Institutional sources (ICI PPP). As an outcome of publishing this paper, the MOE has requested input and ideas to develop policy approaches to improve the prevention and recycling of ICI PPP waste in BC.

**Legal and other references:**

- Provincial Funding:
  - Available for Plastics, Ocean Plastics, and Organics.
- Community Charter Authority for Municipalities:
  - Prohibit businesses from providing certain single-use items.
  - Impose charges on recycled/reusable bags.
  - Require businesses to report item distribution.
  - Set exemptions for disabled persons, medical reasons, financial hardship, etc.
  - Establish plans for bylaw implementation/enforcement.
  - Set bylaws to come into force at least 6 months post-adoption.
- Exemptions:
  - Consider disabilities, medical reasons, and financial hardship.
  - Include specific exemptions and implementation plans.
- Limitations:
  - Municipalities cannot collect charges for bags as fees within their jurisdiction.
- Provincial Statistics:

- 1/3 of waste is recyclable.
- Total ICI PPP disposed is 1.1M tonnes/year, with the majority from Trade and Food Services.
- ACRD Statistics:
  - 63% of ACRD waste comes from the ICI & Construction/Demo sectors<sup>1</sup>.
  - Recent waste audits<sup>2</sup> show over 31% is made up of PPP material (plastics and paper, specifically).

### Key General Questions from MOECCS:

#### Issues & Concerns to Highlight:

- Limited access to recycling services with an appropriate economy of scale.

#### Ideas or Solutions to Share:

- Partnership between small businesses and local governments to use or expand existing infrastructure for ICI PPP materials consolidation and processing. Grant funding for regional districts and municipalities is needed to support these efforts.

#### Where to Prioritize Efforts:

- Improve funding programs to assist commercial businesses, especially small businesses that lack adequate access to recycling services only found in larger population centres.

### Formal Response to MOE Discussion Questions:

#### **1. Are there any desired outcomes missing from this list?**

- Support the EPR principle of ensuring that producers pay for full recovery of these materials, regardless of which sector makes the purchase. The rationale is that, in most cases, the ICI sector is paying EPR fees at the time of purchase. If this is not the case, then fees should be enforced at the time of production and import to ensure fairness for all sectors, including ICI.
- Dissolving barriers to access under EPR for our rural and remote First Nation and other small communities – please see question 2 for more detail.
- Include a focus on public awareness and education on the importance of waste reduction. This will be important to create behavior change within the ICI sector and should be linked to creating economic benefits for both businesses and communities.

#### **2. What outcomes are most relevant to your business, organization, or community?**

- Dissolving barriers to accessing the EPR programs, including PPP: we would like to emphasize the importance of addressing a specific issue regarding First Nation (FN) recyclables. Our First Nation residents are in remote communities - any collection of PPP is typically done locally and consolidated before being brought to a depot facility which can be 1-2 hours away. Because this material is consolidated prior to depot, it is considered as non-residential PPP, excluding them from the current residential program. This categorization must change and the way to do that is inclusion for these communities, as well as all other rural and remote communities under existing EPR. This would alleviate undue hardship for those communities lacking ready access to service.
- Consistency and Confidence in Access: Ensuring consistent and confident access to waste management services is crucial for all members of our communities, with particular attention paid

<sup>1</sup> ACRD annual waste tracking spreadsheet

<sup>2</sup> 2023 ACRD Waste Audit, Section 3.3.2.



to our First Nations as well as our other small remote communities. Reliable access to these services instills confidence and promotes proper waste disposal practices.

- Comprehensive Coverage for all Rural and Remote Areas: As the entire ACRD is rural and remote, it is essential to implement an EPR collection program that covers all sectors, including ICI, throughout our region. This would ensure uniform service delivery and accessibility for all communities, including the most remote areas.
- Utilization of Existing Programs or Development of New Ones: Whether by utilizing the existing Recycle BC program or establishing a new program, it is important to have a robust and efficient waste collection system that meets the specific needs of our diverse and dispersed communities and businesses.

### ***3. How would you prioritize these outcomes?***

- Ensuring that existing EPR for PPP includes all rural and remote communities, especially our First Nations communities.
- Build consistent systems to allow the same access to waste diversion/recycling for ICI customers as well as all other customers.
- Economic benefits for recycling and re-use options to address the PPP that is already in the system. There are several examples in the ACRD to build from, including: mattress recycling through INEO; debris clean-up (Coastal Restoration Society and Surfrider); and recycling of ocean plastics through the Ocean Legacy Foundation.
- A prevention-first approach should happen in parallel to cut off the material stream, followed by maximizing material recovery – include public awareness campaigns here.

### ***4. Are there indicators or measures of success you would suggest are used to determine if an outcome is achieved or is achievable?***

- Percentage recovery of recyclables from ICI and small communities (First Nation and rural).

### ***5. Should non-residential packaging targets be the same, or better than existing residential packaging targets? Why or why not?***

- These targets should remain the same for two primary reasons:
  - PPP material is made up of the same material regardless of the source that is using them.
  - There needs to be the ability to consolidate/process this material where economies of scale can be realized (i.e., in small rural communities with limited access to hauling). When these systems are established, targets should remain the same for consistency.

### ***6. What types of targets would be most useful? Reduction, reuse, recycling, or diversion?***

- Recycling (effectively processing and reusing materials within the economy) and Diversion targets (reducing waste to landfill) are most useful. These two targets can be directly measured and are more impactful. Waste reduction and reuse is more difficult to measure.

**7. Should there be regional or business-specific targets in addition to provincial targets? Why or why not?**

- Yes, there should be regional or business-specific targets in addition to provincial targets. Regional targets make sense when comparing rural and remote areas to high-density populations. Rural and remote regions do not have the same access to recycling services as urban areas. Therefore, it makes sense to create region-specific targets due to the different economies of scale and logistical challenges. Regional targets allow for flexibility and adaptability, promoting efficient resource allocation, encouraging innovative local solutions, and ensuring fairness in achieving overall provincial waste management goals.

**8. How can we measure success or progress against established targets?**

- The best immediate metrics to use are recycling tonnages and diversion. Fundamentally, we want to see a reduction in waste to landfill, which are metrics we can easily access. An important point is to get input on costs. There is an opportunity for ICI to incur lower waste disposal costs, increased resource efficiency, operational efficiencies, enhanced reputation, regulatory incentives, energy savings, and potential revenue from recyclables.

**9. What actions are best suited at the local, regional, or provincial level of government?**

- EPR regulation at the provincial level, supporting local government bylaws to ban recyclable material.
- The province needs to update the EPR model to include ICI-PPP material. This will support Regional District bylaws to ban this material from landfilling.
- Access to services and costs must also be factored in. Local governments cannot afford to create a system in the absence of additional funding – this means increased access to grants to create infrastructure for processing ICI PPP material and creating incentives for technological change to reprocess recyclables at a local level (e.g., Alberni Makerspace Society). Financial incentives are important for businesses to achieve success.

**10. What is already working to prevent packaging waste – for businesses, institutions, haulers, local governments?**

- User fees and access to commercial recycling options, but only where available. The ACRD region has private contractors providing commercial recycling services. However, our most recent Waste Composition Audit showed that the majority of our waste comes from ICI and construction/demolition, with paper and plastic making up 31% of that waste stream, so there is still opportunity to expand on what is working.

**11. Are there other actions that should be considered? What are they?**

- Unknown.

**12. What are the benefits or limitations of these waste prevention options?**

- These are great options, with the understanding that access for businesses is key. Without access to commercial recycling services, it is difficult to convince a business to create an option for recycling. Locally, another limitation is the lack of control over the type of packaging. Local governments can work to ban packaging material in landfills but cannot dictate to producers how to change their packaging. We can only control what comes into the landfill and how we educate. As an aside, we do incentivize by charging more at the landfill for mixed materials which include PPP.

**13. How ready are organizations, businesses, governments to implement?**

- Unknown. Local governments are keen to see options for local businesses. Many local businesses in our region are interested in alternative options, depending on costs. Many local businesses have already removed much of their single-use items in stores.

**14. How should implementation be prioritized?**

- Standardize the metrics for Waste Comp Audits for ICI.
- Update the Recycling Regulation to include EPR for ICI-PPP and provide access to funding to businesses to prepare for the change.
- Create access to recycling services via funding. In parallel, target producers of ICI-PPP to prevent the material from coming in.

**15. What are the benefits or limitations of expanded EPR options?**

- Limitations: EPR programs can be costly to implement, concerns about fairness and equity by shifting costs to producers, dependence on producer compliance if regulatory resources are limited at the local level.
- Benefits: EPR promotes a circular economy with PPP designed for end-of-life management and encouraging sustainable consumption. This incentivizes environmental stewardship through the life cycle of a product.

**16. How ready are organizations, businesses, and governments to implement an expanded form of EPR?**

- Unknown. Local governments are ready but don't create EPR programs.

**17. Are there sectors or materials that should be prioritized to be included or excluded?**

- Schools and small businesses should be prioritized for inclusion, but with significant support from regulators.

**18. How should implementation of EPR actions be prioritized (e.g., by sector, by material, by geographic location)?**

- EPR for ICI PPP needs to be implemented within the Recycling Regulation.
- Additionally, mattresses and bulky furniture are two of our main waste streams in the ACRD – EPR should include both residential and ICI sources in the next amendment.

We would like to thank you for the opportunity to provide feedback on the provincial non-residential PPP discussion paper. If there are any questions, please do not hesitate to contact me at [peichelberger@acrd.bc.ca](mailto:peichelberger@acrd.bc.ca).

Sincerely,

*Paulo Eichelberger*

Paulo Eichelberger  
Solid Waste Manager  
Alberni-Clayoquot Regional District

CC: Jenny Brunn, General Manager of Community Services, ACRD  
Daniel Sailland, Chief Administrative Officer, ACRD



We create chemistry

July 23, 2024  
Honourable George Heyman  
Minister of Environment and Climate Change Strategy,  
PO Box 9047 Stn Prov Gov Victoria, BC V8W 9E2

Dear Minister Heyman,  
Thank you for the opportunity to comment on the [Preventing Waste in British Columbia: Non-Residential Packaging and Paper Products Discussion Paper](#).

At BASF, we create chemistry for a sustainable future. We combine economic success with environmental protection and social responsibility. Around 111,000 employees in the BASF Group contribute to the success of our customers in nearly all sectors and almost every country in the world. Our portfolio comprises six segments: Chemicals, Materials, Industrial Solutions, Surface Technologies, Nutrition & Care, and Agricultural Solutions. BASF generated sales of €68.9 billion in 2023.

The biopolymers business at BASF makes certified compostable and certified soil biodegradable resins, which are raw materials for products sold across the world that help facilitate large-scale organic waste diversion. Collection and composting of organic waste at scale is essential for Canada to meet its greenhouse gas (GHG) reduction goals and to offset impacts of climate change via the use of compost, which has been shown to increase water-holding capacity of soils, prevent erosion, and directly sequester carbon.

We would like to highlight the important role that certified compostable products play in developing a circular economy for organics, since they are tools that enable the collection of food scraps and green waste. In particular, we wish to point to the urgency of diverting organics; as residents and consumers, this is one step we can take immediately to reduce potent methane generation in landfills. The impact of such a step would be significant; if we consider methane accounts for 30% of global warming, and nearly 20% of methane in Canada comes from landfills,<sup>1</sup> with proper program development, British Columbia could make significant progress in reducing greenhouse gases by ensuring organics never arrive at the landfill to create methane or take valuable landfill space.

In support of EPR for the non-residential sector, we wish to point out that ICI facilities often function as a “closed loop”, and this is a special feature that allows for organics diversion program development. BASF has supported several such programs in sports venues, simply because inputs to the stadium are controlled and the champions in procurement, food service, housekeeping, and waste management are all invested in developing a program that works for their facility. From the composter point of view, stadiums generate a large volume of food scraps between the back-of-house kitchens and front-of-house fan spaces. Both in the back-of-house and front-of-house, education programs can be developed specific to the stadium and the audience. We wish to highlight two programs that we have supported on the West Coast to demonstrate the value that certified compostable products provide in helping to divert food waste.

For example, at the Los Angeles Memorial Coliseum, USC and the LA Rams were able to start an organics collection program that allowed the stadium to achieve overall diversion rate of 83% in two years.<sup>2</sup> This was an interesting case study, because the facilities were nearly 100 years old at that time. One of the key points from this example is that there is some cost associated with implementing

<sup>1</sup> <https://canadagazette.gc.ca/rp-pr/p1/2024/2024-06-29/html/reg5-eng.html>

<sup>2</sup> <https://www.biocycle.net/los-angeles-coliseum-modernizes-zero-waste/>

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We create chemistry

the program, and this reveals a case where EPR could support some of the relevant features of this program. During and since our involvement, program has continued to develop and receive recognition for their work in achieving zero waste.<sup>3</sup>

In Seattle, BASF and the Mariners MLB team also did a project to demonstrate the value of a closed-loop venue as an educational platform called “Sustainable Saturdays”.<sup>4</sup> In addition to education in the stadium, the program connected stakeholders in the organics collection value chain locally, to ensure that the collection of food scraps using certified compostable products is clean, safe, and easy for the fans.<sup>5</sup>

As noted in the references, both of these programs also included EcoSafe Zero Waste, a company located in Surrey, British Columbia.<sup>6</sup> And while there are many examples of closed-loop programs successfully diverting 90% or more of waste across North America, in general, the use of certified compostable products in a well-managed system have been shown to facilitate the diversion of food scraps.<sup>7</sup>

For this reason, we advocate for EPR programs including certified compostable products where funds are appropriately distributed to composters who accept these products, education programs, and system design elements related to the use of certified compostables that make all stakeholders successful. As demonstrated in the examples above, the ICI sector is ideal for building organics diversion programs because the waste generators have more control over the waste streams they generate, reducing contamination at the composter. The volume of feedstocks can be large from ICI facilities, which helps composters predict the size and character of the material they will receive.

Italy currently has an EPR program that includes certified compostable products. It has been running for nearly four years now, and is already exceeding its goals. Under this program, the target was to achieve 50% diversion by 2025 and 55% by 2030. The 2030 goal was surpassed in 2022. Additionally, metrics on the education programs show that participants have quantifiable learnings regarding how to participate in the program.<sup>8</sup> More information regarding the program can be found on the Biorepack webpage.<sup>9</sup>

In addition to Italy, we see new EPR programs being designed in states in the US; in particular, certified compostable products are included in legislation passed in California, Colorado, and recently, Minnesota.

We would ask that an EPR program designed for non-residential facilities in BC include certified compostable products that are tools for facilitating organic waste diversion, and that the program ensures an equitable portion of the funds from the program are directed to education and infrastructure to support the processing of these products. Additionally, certified compostable product manufacturers and composters should have representation in their respective PROs and advisory boards.

<sup>3</sup> <https://www.lacoliseum.com/sustainability-awards/>

<sup>4</sup> <https://www.mlb.com/news/mariners--basf-team-up-for-sustainable-saturdays/c-116567406>

<https://www.mlb.com/mariners/news/sustainable-saturdays-at-safeco-field/c-28894240>

<sup>5</sup> [https://www.youtube.com/watch?v=7l\\_7w-BvPeA](https://www.youtube.com/watch?v=7l_7w-BvPeA)

<sup>6</sup> <https://ecosafe.green/about-us/>

<sup>7</sup> <https://www.biocycle.net/compostable-products-postconsumer-food-scraps/>

<sup>8</sup> <https://plast.dk/wp-content/uploads/2024/04/Marco-Versari-Biorepack.pdf>

<sup>9</sup> <https://eng.biorepack.org/>

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BASF continues to champion the transition to a circular economy, and we support the governments mandate to better manage waste across multiple sectors, and through various methods, including the diversion of organic waste with certified compostable products. We thank you for your consideration and are eager to engage in further discussion on this topic and others in the future.

Regards,



Eva Musso  
Head of Sustainability and Government Relations  
BASF Canada Inc.

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July 19, 2024

**Subject: BC Dairy Submission on Preventing Waste Outside the Home**

To Whom It May Concern:

I am writing today on behalf of BC Dairy to provide feedback in response to the Ministry of Environment and Climate Change Strategy's new discussion paper, *Preventing Waste in British Columbia: Non-Residential Packaging & Paper Products*. As farmers, Dairy Producers are committed to environmentally sustainable practices, and take pride in caring for the land that they work on.

BC's dairy farmers play a vital role in stewarding the environment they work in while ensuring food security for British Columbians. As an industry we are committed to contributing to sustainable food systems for communities across BC. Farming is not only our livelihood; it's a way of life. It's about nurturing the land that sustains us, caring for the animals that rely on us, and providing nourishment for our communities.

Dairy farmers are also integral to BC's economy. Together, there are more than 400 dairy farming families across BC produce over 800 million liters of milk each year, contributing over \$1.2 Billion in provincial GDP, and employing over 12,000 workers.

Despite the integral role dairy farmers play in the local economy, producers have been met with significant obstacles. The cost of production continues to rise. Factors such as feed and fuel costs, labor expenses, and regulatory requirements have all increased, placing financial strain on dairy operations in BC, and making life harder for producers. In fact, BC is now the second least profitable province in Canada for farmers to operate in.

**While dairy farmers are resilient and adaptive, BC Dairy has concerns about adding additional regulations to an already over-burdened sector. Every new regulatory requirement that adds cost to dairy farmers intensifies pre-existing challenges.**

Waste reduction solutions that necessitate costly infrastructure upgrades and increased administrative duties to ensure compliance can add additional strain on already tight





budgets. That's why BC Dairy is supporting policies that result in a reduction in business costs for dairy farms, including short-term tax reductions, cost offsets, and tailoring existing government programs to make life more affordable for dairy producers.

As it pertains to non-residential packaging and paper products, we support the three recommendations put forward by the BC Agriculture Council, namely:

- Favour voluntary programs wherever possible to account for feasibility gaps in waste collection;
- Commit financial resources from the Government of B.C. to offset the development costs of any new or expanded programs related to agricultural packaging; and,
- Clearly communicate to farmers and ranchers the public service good and potential financial savings that can be achieved through any new or expanded programs.

Thank you again for the opportunity to provide comment on the Ministry's *Preventing Waste in British Columbia: Non-Residential Packaging & Paper Products* discussion paper. We ask that the perspectives and concerns of dairy farmers be duly considered prior to identifying new policy approaches to address this important issue.

It is essential that we work collaboratively to address these challenges and safeguard the future of dairy farming in British Columbia. Our farmers deserve our full support as they continue to uphold the highest standards of quality and sustainability while producing needed dairy products for Canadians.

Thank you,

A handwritten signature in black ink, appearing to read 'Jeremy Dunn', is written over a light blue horizontal line.

Jeremy Dunn  
General Manager  
BC Dairy  
[jdunn@bcdairy.ca](mailto:jdunn@bcdairy.ca)  
604-294-3775

July 23<sup>rd</sup>, 2024

To: BC Government Circular Communities

From: Vio Sustainability

c/o Enzo Casal, Founder

## **Introduction**

My name is Enzo Casal and I am a waste and recycling consultant with my company, Vio Sustainability, and I am writing in support of the potential policies listed in the discussion paper: “Standardized waste prevention and management actions for businesses and institutions” and “Provincial data standardization and sharing”. I am hoping to write about my experience to shed some light on why I believe these policies are important, how I can see them being applied, and finally, things to consider when implementing. I bring with me experience from working with clients such as Recycle BC, Cleanfarms, and others in the recycling space on various projects optimizing their operations, understanding the necessary incentive structures, and running pilot projects to try novel approaches to increase diversion and recycled output.

My interest in tracking data in waste and recycling took numerous turns and is why I still care about the problem today. I started my journey in the waste and recycling industry during my MBA when I founded my first venture, Coastable Biotechnologies, which explored using crustacean shell waste to create a bioplastic to replace plastic packaging in the food industry. Realizing I didn’t fully grasp how my new plastic would have fit in the ecosystem especially with Metro Vancouver moving to ban bioplastics, I decided to pursue a position within the industry and began an operations position with Emterra Environmental overseeing operations and logistics for three transfer stations in Metro Vancouver. This role exposed me to more facets of the industry and helped me understand the movement of materials through the region. As I would view the sites’ tip floor, which houses material destined for incineration or the landfill, I always noticed items that could be salvaged, recycled, or repurposed. This always made me wonder why the only time we ever measure any volumes is when a truck scales into our sites. We could get the net weight of the vehicle after it tips to know how much material was deposited on site, however at that point it’s usually too late to segregate the material. The question plagued me enough that after leaving Emterra I began working on a platform to track this type of data.

## **Traceability is an Issue**

Joining the entrepreneurship@UBC incubator helped me approach the problem from a customer-focused mindset; I had to ensure there was a viable business case that was

solving an actual pain point. Through this, the business idea went through a lot of pivots. The model with the most traction was helping large organizations with public sustainability commitments track their waste production. I came up with a scenario I would present potential customers about how they need to cut their waste management budget and currently track two types of waste materials, A and B. Material A has a 90% diversion rate whereas Material B has a 50% diversion rate in their company. Initially they opt to continue Material A and cut collection of Material B. I then add that they find out downstream that Material A has a 30% recycling rate whereas Material B has a 90% recycling rate. I discovered that when presenting potential customers with the scenario, the answer, while obviously is to continue recycling Material B and reduce the budget for Material A, always brought up their biggest concerns that they do not have confidence in the data their collecting and are at the mercy of what their waste haulers tell them. They have to take the word of their waste management partner, yet they do not fully believe the material is getting recycled. Those that have reported improvements in diversion numbers admit that although their diversion is up, they do not know their actual recycling numbers. This would bring up the question if the money they are investing into their initiatives are being fruitful. We started to call this the “black box” of waste management where once the material is no longer in their custody, they do not know what happens to it. This line of conversation always brought interest to the individual I was talking to who was typically on the sustainability team or the company’s operation team and they would ask how they could work to fill their information gaps in order to make better decisions.

The conversations around tracking evolved into a few organizations such as UBC and BCIT sharing their data with my team and I to model a waste tracker to see if there were any trends they could leverage. For these institutions, their biggest pain points were that they were always a year behind on their waste data. It was mid 2022, and they were still in the process of analyzing data from 2020 and have not even compiled data from 2021. Additionally, they always had to work with weight estimates provided by the haulers which reduced the accuracy of the data. On the corporate side, conversations with Air Canada and Telus revealed that they had their own internal systems for analyzing their data, and while they always lamented about having to work with estimates as well, another pain point that emerged was how disjointed they would receive their data from different waste haulers. It resulted in their team having to massage the data to be uniform and fit into their built databases which meant a very hands-on approach. Their concerns were in small errors building up as they continually had to manage different data sets that could eventually misrepresent the actual waste picture that they were dealing. This was important to them because, ultimately, they are basing their business decisions on the trends and analyses generated from the datasets.

## **Lack of Incentives**

Despite creating a rudimentary database and addressing the concerns of the initial base of potential customers by automating consolidation, the model did not garner ongoing support because it was difficult to correlate the value created for the companies at the end by solely tracking waste. The conversations shifted to waste tracking being less of a priority as companies focused on lower hanging fruit with defined incentives mostly in the carbon reduction space. Waste was still on their agenda, but their approach shifted to be more holistic as ESG became the biggest buzzword. Companies now wanted full suite tracking including energy, water use, etc. which was out of the scope of work I was accustomed to. This trend continues as waste appears lowest on the totem pole of concerns. Anecdotally, smaller waste reduction organizations took a hit during COVID as businesses dropped their responsible waste management initiatives first.

Exploring this new space made me realize that showing a reduction in carbon is a lot easier and straightforward compared to showing waste reductions. Simple calculations can be done to show a reduction in fuel consumption or energy use, whereas the question of waste recycled per tonne is more complex. Being driven by their customers demands, it is easier for companies to market carbon emission reductions to get their attention. Likewise, the federal government has several policies in place that either punish those that overshoot their carbon allowance through a carbon tax or reward those that have managed a reduction. For a company, the direct savings is also obvious: invest in energy savings and you see immediate returns in your electric, hydro, or heating bills year over year. This is not the case for waste and recycling and sometimes may cost more before seeing tangible results. I even explored trying to connect better waste management practices to a reduction in carbon emissions. Is there a difference in carbon emissions in a tonne of cardboard landfilled versus a tonne of cardboard recycled? Yes, and while possible, the math is extremely variable based on geography and available infrastructure, and honestly a bit convoluted to rationalize since there is no standard whereas for carbon it's just a molecule of carbon per million parts emitted. Metro Vancouver also considered incinerated mixed solid waste as "recycled" when tallying up material that has been landfilled, exported out of the region, or actually recycled, and there is a lot of contention around that metric. In short, companies are interested in waste tracking initiatives, but find it hard to rationalize when there are few incentives to do so. As such, they are more likely to put investments in other activities with more guaranteed tracking of their initiatives.

## **Data Resolution and Capacity Building**

I had mentioned at the start that I am a consultant and not an entrepreneur. After all the learnings and history mentioned above, the best path career-wise for me at the time was to

follow my own customers and what they were willing to pay for and that was my own services; I had to put a pause on the tracking project because I did not see sufficient market signals that this would be beneficial. Nevertheless, tracking, traceability, and transparency comes up all the time in my projects. As an example, when working with Emterra, Metro Vancouver ran a carpet recycling pilot project. This was received quite well and contractors started developing the behaviour of separating their carpet from other garbage. There was a local company that handled the recycling and was able to produce nylon pellets as a product. Unfortunately, the company folded during COVID and along with it did the pilot project. I've had several conversations with Metro Vancouver and the City of Vancouver to restart the project because of the amount of carpet that moves through the region. From the pilot project, we have learned several things. First, not all carpet is created the same. There are square tile carpets, carpets with different pile length, and all of this affects if it can be recycled depending on the infrastructure available. While we know there is a significant enough volume of carpet moving through Metro Vancouver because of the waste audits conducted, we have visibility on what *type* of carpets they are. We had interest from a company in Ontario that was considering shipping unused machinery to Vancouver to participate in the pilot, however without information on what can be collected, their interest quickly fizzled. On top of that, while the pilot provided some numbers on what was being collected at the transfer stations and landfill, the total amount that could be collected was an estimate. Without knowing what consistent volumes would look like, it became difficult to create an economically viable argument for the carpet recycling company to reasonably risk sending the equipment and starting operations in Metro Vancouver. With better data and data from other sources, this initial willingness could have benefitted many interested parties. In general, understanding feedstock availability and consistency would be key for recycling operations. Currently, City of Vancouver and I are in talks of restarting a collection pilot just to quantify what types of carpet we can collect and separate to get a better idea of what type of equipment will be needed.

## **Conclusion**

I believe that implementing both policies on “Standardized waste prevention and management actions for businesses and institutions” and “Provincial data standardization and sharing” would address the concerns I've learned and encountered in this feedback response. Establishing criteria for waste audits, mandating their requirement in selected industries, and making that information publicly accessible would help in understanding waste flows in our province. Adding a requirement on transparency for traceability would also be crucial in understanding if efforts put into sustainability and recycling initiatives are moving past just the diversion rate and towards an increased recyclability rate.

Concerns may arise from companies on releasing information on their waste and how this could affect privacy and competition. Producer Responsibility Organizations already do this and still maintain the privacy of their members by being responsible for data collection, consolidation, and reporting. Through consolidating information, we still achieve the nuanced information we would need to understand the region's waste picture and allow companies' their privacy to operate without fear of facing anti-competitive actions. Finally, incentives will still be needed. I believe the movement towards carbon reduction came at a time where incentives were given however not much has been seen for waste reduction as of yet.



July 23, 2024

Ministry of Environment and Climate Change Strategy  
Recycling Regulation Amendments  
PO Box 9341 Stn Prov Govt  
Victoria, BC V8W 9M1

Submitted via email: [circularcommunities@gov.bc.ca](mailto:circularcommunities@gov.bc.ca)

**RE: Preventing Waste in British Columbia: Non-Residential Packaging & Paper Products**

Cleanfarms is an industry-led stewardship organization that develops recycling and waste management programs for Canada's agricultural sector. We have been a strong partner to British Columbia's farming community for over 30 years.

We welcome the opportunity to provide input into the province's plans to develop policy approaches for non-residential packaging and paper products.

There is a lot of momentum underway to help British Columbia's farmers recycle more of the plastics or products that are part of their farming operations. Cleanfarms has had the privilege to work directly with ag-retailers, farmers and communities to deliver both short term and long term projects. We would encourage the Ministry to tap into this momentum to inform any policy development that may impact British Columbia's diverse agricultural sector.

We look forward to being a part of the province's ongoing efforts to expand extended producer responsibility, where appropriate. As always, we can help facilitate adequate consultation with the agricultural sector to create positive environmental outcomes.

Sincerely,

Kim Timmer  
Director, Stakeholder Relations and Policy



## Preventing Waste in British Columbia: Non-Residential Packaging & Paper Products

*Comments provided by Cleanfarms – July 23, 2024*

### About Cleanfarms

Cleanfarms is a federally incorporated not-for-profit, industry-funded, stewardship organization committed to environmental responsibility through the proper management of agricultural waste. Our membership is mainly comprised of a variety of companies that support voluntary recycling programs and/or those that are obligated by EPR-type policies across Canada.

We make it possible for farmers to safely dispose of or recycle agricultural packaging waste, primarily plastic, through programs financed and supported by our private sector members. We also deliver government-funded pilot programs.

While there are over 170 stewardship organizations across Canada, Cleanfarms is the only organization that works in the agriculture sector. We have approximately 10 sister organizations around the world, in places like Germany, France, and New Zealand. Cleanfarms collaborates with its sister organizations to share best practices, develop end markets and ensure harmonization and efficiencies.

Our latest achievements, recently published in our [2023 Annual Report](#), demonstrate Cleanfarms' resolve to keep ag plastics circulating in the economy and out of the environment in British Columbia and across Canada.

### Introduction

Overall, we commend the Ministry of Environment and Climate Change Strategy (Ministry) for taking on this initiative and moving towards concrete action on non-residential packaging and paper products.

The comments that follow focus on questions and areas that, in our view, impact potential program development within agriculture. Cleanfarms has also drawn on some of what we heard while attending the ministry-led information session/workshops.

### Section: Exploring provincial policies

*11. What is already working to prevent packaging waste – for businesses, institutions, haulers, local governments?*

Cleanfarms is currently operating a voluntary program in British Columbia (BC) for empty pesticide and fertilizer containers, (primarily 23L and under) and for unwanted pesticides and old livestock/equine medications. More recently, we initiated pilot programs to collect select items that include baler twine, bale wrap, silage plastic/bunker covers and grain bags in several BC communities. We believe that our work demonstrates interest and support from the agricultural sector. We strongly encourage the Ministry, as it considers policy options, to build on Cleanfarms' existing programs.

During the workshops, we heard suggestions from some participants, that it might be useful to expand the existing residential program (e.g., the program managed by Recycle BC) to include ICI packaging. We do not recommend that the ministry consider expanding Recycle BC's residential program to include packaging used in the agricultural sector. Instead, we recommend the Ministry support a sector-specific approach for agricultural plastics and packaging due, for example, to the specialized nature of some of the contents in commercial-class pesticide containers. Pesticide containers require specialized handling in order to meet industry-wide standards around health, safety and the environment.



*12. Are there other actions that should be considered? What are they?*

While this may not be directly related to the policy approaches suggested in this section, Cleanfarms strongly recommends that the province invest in funding that will allow organizations like Cleanfarms to deliver pilot projects that help develop the knowledge needed to deliver extended producer responsibility programs and demonstrate proof of concept. Pilot projects can also reduce development costs and costs associated with managing large volumes of legacy materials, which are key costs associated with permanent EPR-type programs. (See question 16; costs are a major pain point with growers/farmers.)

*14. How ready are organizations, businesses, governments to implement?*

While this section does not specifically mention extended producer responsibility (EPR) for the agricultural sector, Cleanfarms is ready to engage with the Ministry to help design an EPR policy for agricultural plastics and packaging that takes into account the unique circumstances and needs of the province's grower communities, that harmonizes with other programs and achieves the economies of scale that are the hallmarks of successful program performance.

*15. How should implementation be prioritized?*

Again, this section does not specifically mention extended producer responsibility (EPR) for the agricultural sector. However, if the Ministry decides to move forward with a sector-specific EPR policy for agriculture, Cleanfarms recommends consultation directly with the farming sector, including grower groups, farmers, producers (businesses that supply farmers with agricultural products, also known as obligated parties), retailers and agricultural-intensive local governments and other communities impacted by the agricultural sector.

**Section: Extended Producer Responsibility programs**

*16. What are the benefits or limitations of expanded EPR options?*

Benefits:

There are a number of benefits to expanding EPR options. Cleanfarms has limited its comments to the benefits that resonate the most within the agricultural sector:

- Extended producer responsibility (EPR) for the agricultural sector provides farmers with a reliable, long-term program to manage agricultural plastics and packaging that are part of their farming operations. This allows farmers to meet their ongoing commitments to the sustainability of their land.
- The agricultural sector has a long-standing commitment to good stewardship of land and its products. EPR is a natural fit to good stewardship.

Limitations:

A recent grower survey (available upon demand) demonstrated that farmers are keenly interested in using recycling programs for ag plastics. There is significant pushback from farmers about assuming the costs that are associated with recycling programs, including those developed in response to EPR. EPR is often viewed as a 'price increase' that is passed on to the farmer. Cleanfarms recommends that the Ministry consult closely with British Columbia's grower groups to better understand grower sentiment.

Ways to address limitations and ensure maximum benefit:

Please see question 12.

An extensive consultation process and harmonization with other jurisdictions is also key.

*17. How ready are organizations, businesses, and governments to implement an expanded form of EPR?*

Cleanfarms and its members welcome the opportunity to engage with the Ministry to design a sector-specific policy approach for agricultural materials – one that harmonizes with agricultural programs in other provinces.

Cleanfarms has significant expertise in delivering recycling programs that meet the needs of Canadian farmers. We do recommend that provincial government officials consult with farmers, obligated parties and Cleanfarms on implementation timelines and other key aspects of any policy or program.

*18. Are there sectors or materials that should be prioritized to be included or excluded?*

Cleanfarms requests that the Ministry engage directly with potential producers (obligated parties under EPR policies) and take into account Cleanfarms' existing programs and pilots in BC, plus programs planned or operating in other provinces when creating designated material or product lists to promote standardization and economies of scale in materials management. A recent [agricultural waste characterization study](#) may be a helpful tool for this exercise.

*19. How should implementation of EPR actions be prioritized (by sector, by material, by geographic location)?*

See the previous question.

On a related note, please note the following points that may be unique to the agricultural sector:

- The agricultural sector is very specialized. Cleanfarms strongly recommends that the Ministry consult heavily when developing definitions for materials that may be impacted by potential EPR policies. For example, some stakeholders may feel that the term 'non-residential packaging & paper products' excludes a lot of the agricultural plastics that are part of farming operations. A term that would resonate more with the agricultural sector could be 'agricultural plastics and packaging.'

On a similar note, there may be some confusions with the term 'IC&I'. In some subsectors, obligated parties might consider agricultural plastics and packaging sold to a farmer to be in a different 'category' from agricultural plastics and packaging used inside an agricultural production facility like a feed mill or seed treating facility.

- The agricultural sector is very cyclical. This means that farmers may not have time for consultations during certain times of the year (e.g., harvest, calving, etc.).
- There are some sensitivities within the agricultural sector about potential reuse or reduction initiatives. In most cases, agricultural plastic usage is necessary to ensure the safety and security of the land and animals.

Cleanfarms can assist the Ministry as it develops specific tools that are geared towards the agricultural sector. British Columbia also has a strong network of grower groups who can assist with grower engagement.

**Overarching comments from Cleanfarms:**

1. Cleanfarms encourages the Ministry, to the extent possible, to prioritize harmonization with EPR programs underway or in development in other Canadian provinces, in particular Alberta, Saskatchewan and Manitoba. This will foster economies of scale and program operational efficiencies.
2. If the Ministry decides to move forward with an EPR policy for agriculture, Cleanfarms recommends consultation directly with the farming sector, including grower groups, farmers, producers (obligated parties under EPR policies), retailers and agricultural-intensive local governments and other communities impacted by the agricultural sector.

**In closing**

We look forward to continuing our work with the Ministry on development of policy approaches for non-residential packaging and other related agricultural products.

# Preventing Waste in British Columbia: Non-Residential Packaging & Paper Products



## **SUBMISSION TO:**

British Columbia Ministry of  
Environment and Climate  
Change Strategy

**July 22, 2024**



**CHEMISTRY INDUSTRY  
ASSOCIATION OF CANADA**



CHEMISTRY INDUSTRY  
ASSOCIATION OF CANADA  
PLASTICS DIVISION

ASSOCIATION CANADIENNE DE  
L'INDUSTRIE DE LA CHIMIE  
DIVISION DES PLASTIQUES

July 22, 2024

Honourable George Heyman  
Minister of Environment and Climate Change Strategy  
PO Box 9047 Stn Prov Gov  
Victoria, BC V8W 9E2

Email: [Circularcommunities@gov.bc.ca](mailto:Circularcommunities@gov.bc.ca)

**Re: Discussion Paper - Preventing Waste in British Columbia: Non-Residential Packaging & Paper Products**

Dear Minister Heyman,

The Chemistry Industry Association of Canada appreciates the opportunity to respond to the Government of British Columbia's [Discussion Paper – Preventing Waste in British Columbia: Non-Residential Packaging and Paper](#) published on April 23, 2024.

Representing a \$35 billion industry, CIAC's members encompass the entire plastics value chain, including resin and raw material suppliers, processors/converters, equipment suppliers, recyclers, and brand owners. With key concentrated presence in British Columbia, Alberta, Ontario, and Quebec, the CIAC Plastics Division is the national voice and leader in plastics industry sustainability. In British Columbia, plastics manufacturing represents over \$1 billion of economic output, with over 11% of Canadian establishments located in the province. The sector is dominated by small and medium sized firms; 86% of businesses comprise of fewer than 100 employees, and 99.5% have fewer than 500 employees.

The Chemistry Industry Association of Canada (CIAC) commends the Ministry of the Environment and Climate Change Strategy on its proactive approach outlined in the Non-Residential Packaging and Paper Products Discussion Paper. We share B.C.'s objectives to create a circular economy for plastics and to divert plastics from landfills. We remain committed to working with all governments to implement an innovative and forward-looking plan to create a circular economy for plastics through improved product design, enhanced recovery systems, and augmented end-markets for post-consumer plastics.



## General Comments

CIAC supports the CleanBC Plastics Action Plan and its goals to reduce plastic waste in the province by incorporating a circular economy. Today in Canada, approximately 9 per cent of all post-consumer plastics are recycled. The lost opportunity cost of plastic material not being recovered in Canada is nearly \$8 billion and this is estimated to rise to \$11.1 billion by 2030.

Even with the success of the province's residential Extended Producer Responsibility (EPR) program for plastic achieving a 49% per cent recycling rate, B.C. still has a significant infrastructure capacity gap for recycling, estimated at \$700 million. However, B.C. also has the unique opportunity to capitalize on the leadership it has already demonstrated through its residential EPR program.

## Extended Producer Responsibility

CIAC commends British Columbia for the outstanding performance of its (EPR) residential program for paper, plastics, and packaging. The program's success is evident in the remarkable accessibility and efficiency it offers to residents, with 99.3% of households having access to recycling services and 98% of the collected plastic sent to recycling end markets, including local markets, thereby keeping the material in BC's economy. As a result, BC is well positioned to leverage current successes into future investment and job growth through advanced mechanical and chemical recycling. Recycling creates jobs which are skills based, provide higher wages, and offer permanent employment opportunities.

CIAC supports BC's efforts to keep more paper and plastic packaging (PPP) products in the economy, and out of landfill and the environment by including the non-residential sector. However, we want to emphasize that this sector is made up of different suppliers than those that participate in BC's successful residential EPR programs. As such, government should allow those suppliers supporting the non-residential sector to set up a parallel management system with a separate regulatory approach and a stewardship organization that is best placed to represent them. Furthermore, we would like to recommend that the following general principles be kept in mind:

- Ensure a gradual and orderly inclusion of that over a reasonable timeline that ensures cost increases can be passed on to producers evenly and incrementally.
- Ensure transparency in communication and decision-making, as well as meaningful engagement and consultation with all producers through the process.
- Ensure producers have sufficient flexibility in making business decisions and establishing new commercial arrangements with service providers for the new products in order to meet waste diversion targets and collection standards.



**CIAC Recommendation:** The creation of a plastics management program for the non-residential sector should be implemented in a flexible manner with generous timelines to allow the regulated entities to establish stewardship organisation(s) and the required infrastructure and funding to be in place to deliver a successful program.

### **The Industrial, Commercial, and Institutional (ICI) Sector (non-residential)**

The ICI stream includes hospitals, schools, universities, and government facilities – who have primary responsibilities outside the scope of collecting and reporting on plastic flows within their operations. In the case of a new plastic management program for the ICI sector, would the obligated parties be the suppliers to the ICI sector or the ICI entities themselves? CIAC believes that the obligated party should be the suppliers as is the case in the residential EPR programs in BC.

We would also recommend BC consider the following when developing a policy approach for the ICI sector:

- There is much more variation in the ICI sector than the residential sector in terms of composition and quantities of the types of PPP available for collection
- The ICI sector deals with both business-to-consumer packaging and business-to-business packaging which have significant differences in volumes and ease of collection
- ICI institutions have primary responsibilities outside the scope of plastic flows and their relationship to plastics is less about the material itself and more on the products' purpose and use. As such, there may need to be additional education and outreach to ensure these institutions fully understand the meaning of being incorporated into a provincial EPR program.
- Access to detailed and coherent datasets for ICI PPP generation and management in BC, as in the rest of Canada, is limited
- Significant amount of reuse activities and strategies are already applied within the ICI sector already, including for totes, pallets, crates, trays, and pressurized containers

**CIAC Recommendation:** Given the diversity and unique responsibilities of institutions like hospitals, schools, universities, and government facilities, as well as the significant variations in packaging types and volumes, a phased and adaptive approach is essential for effective integration into a provincial EPR program.



## Other Policy Approaches

The Discussion paper proposes several other policy approaches, not including EPR, as potentially being applied across the province. CIAC supports the creation of a new plastic management program for the ICI sector as the best option to manage non-residential packaging. Regarding the other policy approaches identified in the discussion document CIAC provides the following comments and recommendations.

List of designated recycled materials and supporting actions - Rather than a listing of 'readily recyclable' materials, CIAC recommends adopting an approach that sets concrete targets for materials recovery, developed in conjunction with the regulated entities (i.e. industry) that would allow for a more effective ICI resource management program.

**CIAC Recommendation:** Work with the regulated entities to set realistic quantitative targets for recovery/recycling that allow for continuous improvement over time.

Disposal bans for packaging materials – Regional disposal bans are already in place in all but 3 regions in the province with varying degrees of effectiveness. Rather than banning disposal of plastics, B.C. could increase the recycle rate of those items through specific incorporation in resource management programs and by investing in recycling opportunities in British Columbia. These programs are designed to incentivize suppliers to account for these behaviours by developing and managing efficient collection, sorting, and recycling.

**CIAC Recommendation:** Rather than implementing disposal bans for ICI packaging, British Columbia should instead develop a provincial resource management program that include these materials and that incentivizes provincial action and industry solutions for sustainable management.

Standardized waste prevention and management actions for businesses and institutions – CIAC does not support requiring individual businesses and institutions to create, manage, and report on individual waste prevention plans. This has the potential to create a fragmented plastic management landscape within the province that would not be an improvement on the status quo. The challenge of dealing with plastic pollution in BC must be dealt with holistically with clear targets and processes for regulated entities. This policy proposal would also make it more difficult to align with upcoming ICI plastic management approaches underway in other provinces.



## Compostable Materials

The Discussion Paper mentions that over 50 per cent of all municipal solid waste in BC is made up of recyclable or compostable materials with plastics making up 14 per cent and compostable organics representing 19 per cent. B.C. has already contributed to funding composting facilities and programs to increase the diversion of organic material and support its use as compost. However, currently compostable plastics and packaging are not considered equivalent to other recyclable plastic products under BC's residential EPR program. Manufacturers of compostables fund the EPR program but funding does not go to composters who accept these products. The current consultation represents an opportunity for BC to develop a resource management plan for the ICI sector which fully includes compostable packaging in the mandate of a stewardship organization led by regulated parties. We urge government to take the following into account:

- The back-of-house collection of organics possible in the ICI sector is ideal for leveraging certified compostable products to help support the diversion of organic waste.
- Organics collection from the ICI sector is quite readily achieved, since the pre-consumer portion is quite large, making it attractive for composters who can receive significant quantities from a single waste generator.
- Landfill capacity is rapidly diminishing, and landfills contribute significantly to emissions of greenhouse gases.
- Removing contamination for these pre-consumer (back of house) feedstocks is much easier to achieve than in the post-consumer residential sector. Post-consumer ICI (front of house) can be successfully implemented in scenarios which are a "closed loop"; inputs to that process are controlled, and both the collection system and education is managed locally by the establishment.
- Composters who process these materials should be equally represented and receive funding support from a potential stewardship organization which will enable them to build robust programs.

**CIAC Recommendation:** A well-designed resource management program for plastic packaging from the ICI sector must include certified compostable products. Diversion of organics from landfills to composting processes prevents unwanted methane emissions and the collection, cleaning, and sorting of these materials is much easier to achieve for the ICI sector than for its residential counterpart.





## Conclusion

CIAC is committed to supporting British Columbia's efforts to reduce plastic waste through sound policy, regulation, and innovation. By fostering a circular economy, we can achieve significant environmental and economic benefits. We urge the government to consider our recommendations to enhance the effectiveness of the proposed strategies for the non-residential sector.

Please do not hesitate to reach out if you require further information or have any questions.

Sincerely,

Peter Mirtchev, Ph.D.  
Policy Manager, CIAC Plastics Division



## Appendix – Answers to Certain Discussion Questions

### **Discussion Question #2 - What outcomes are most relevant to your business, organization, or community?**

For CIAC and its members, the most relevant outcome is keeping PPP products in the economy and out of the environment and landfill in a way that grows end-markets for recycled plastics, expands recycling infrastructure in the province and creates stable jobs.

### **Discussion Question #4 - Are there indicators or measures of success you would suggest are used to determine if an outcome is achieved or is achievable?**

CIAC would suggest the following measures of success:

1. Recycling Rates - Track the percentage of PPP that is recycled or recovered annually
2. Access to Recycling Services: Monitor the percentage of ICI entities with access to comprehensive recycling services, striving to match the performance of the successful residential EPR program.
3. Job Creation: Monitor the number of jobs created in the recycling and waste management sector, focusing on the development of skilled, higher-wage, and permanent employment opportunities.
4. Reduction in Landfill Waste: Measure the decrease in the volume of plastics and packaging materials sent to landfills, ensuring that more materials are diverted towards recycling and recovery.

### **Discussion Question #5 - Should non-residential packaging targets be the same, or better than existing residential packaging targets? Why or why not?**

Non-residential packaging targets should be tailored to reflect the unique challenges and opportunities of the Industrial, Commercial, and Institutional (ICI) sector, rather than being identical to residential packaging targets.

1. Variation in Packaging Types and Volumes: The ICI sector deals with both business-to-consumer and business-to-business packaging, which differ significantly in terms of volume and ease of collection. This diversity necessitates customized targets that account for these variations.
2. Flexibility and Adaptability: ICI entities require flexible and adaptive targets that accommodate their specific needs and operational realities. This approach allows for a more effective integration into the Extended Producer Responsibility (EPR) program, ensuring that targets are achievable and meaningful.
3. Data and Infrastructure Limitations: The ICI sector often lacks detailed and coherent datasets for packaging generation and management. Customized targets can



address these gaps by promoting gradual improvements in data collection and infrastructure development.

**Discussion Question #16 – What are the benefits or limitations of expanded EPR options?**

The benefits of a separate resource management program for the non-residential include the following:

1. **Enhanced Recycling Rates:** CIAC supports the creation of a stand-alone resource management program for plastic packaging from the ICI sector. Such a program can significantly increase recycling rates by holding producers accountable for the end-of-life management of their products. This incentivizes better product design and more efficient recycling systems.
2. **Reduction in Waste:** A new stewardship program which captures more types of packaging and products from non-residential sources, there is a greater potential to divert waste from landfills and reduce environmental pollution. This contributes to cleaner communities and healthier ecosystems.
3. **Job Creation:** The development and expansion of recycling infrastructure under a stewardship program can create new jobs in collection, sorting, processing, and recycling industries. These jobs are often higher skilled and better paid compared to traditional waste management roles.

Limitations of a stand-alone plastic management program include:

1. **The suppliers of paper and plastic products are different for the ICI sector than they are for the residential sector.** The volumes and types of plastic packaging are different as well and this needs to be considered by government. A stewardship organization formed from best-placed suppliers in the ICI sector that represents their needs will be crucial for successfully managing plastic in BC.
2. **Complexity and Compliance:** The expansion of EPR programs adds complexity to waste management systems. Producers, especially small and medium-sized enterprises, may struggle with compliance due to limited resources and expertise.



**Discussion Question #17 - How ready are organizations, businesses, and governments to implement an expanded form of EPR?**

While there is a foundation of readiness among larger organizations and the provincial government, significant efforts are required to bring SMEs, institutional sectors, and local governments to a similar level of preparedness.

- Hospitals, schools, and government facilities may have varied readiness levels, with some institutions lacking the necessary infrastructure and knowledge to manage plastic flows efficiently
- Continuous education and outreach efforts are essential to raise awareness about the benefits and responsibilities of EPR, particularly among SMEs and institutional sectors
- Ensuring adequate investment in recycling and waste management infrastructure to handle increased volumes from expanded EPR.



## Binnners' Project

### Non-Residential Waste Discussion Paper | Province of BC

*July 23, 2024*

Binnners' Project is a group of waste-pickers aided by support staff dedicated to improving their economic opportunities, and reducing the stigma they face as informal recyclable collectors.

Binnners' Project is a project on MakeWay's shared platform which provides operational supports, governance, and charitable expertise for changemakers. MakeWay is a national charity that builds partnerships and solutions to help nature and communities thrive together.

Binnners are among one of the most marginalized groups in urban areas. Their livelihoods stem from refunds received from used containers collected from bins. Binnners positively contribute to our environment by diverting a considerable amount of waste. Specifically, binnners work on the streets to recover bottles and cans that would often be thrown into landfill streams.

Binnners' Project works alongside a number of other waste-picker organizations in Canada and North America doing similar work, including Calgary Can, Co-op Les Valoristes (Montreal), GoodSort (Toronto), GroundScore (Portland), and Sure We Can (New York City).

#### *What we do*

At its core, Binnners' Project is dedicated to reducing the stigma associated with binning and to work collaboratively to build new income-generating opportunities for binnners. We do this by operating social enterprise programs that offer the triple benefits of waste diversion, social inclusion, and income generation. Through their participation in these programs, binnners sort waste at commercial and residential buildings, and at events to help our clients achieve their waste diversion goals. In turn, binnners earn a fair income while building their capacity as waste management system experts.

#### *Characteristics of the Binner Community*

Binnners, also known across Canada as canners, dumpster divers, valoristes, and waste-pickers, have little organized, articulate presence in Vancouver and across cities in Canada. This lack of representation means that a population characterized by self-reliance and positive environmental service is highly marginalized and often overlooked. For example, in 2005, the City of Vancouver recommended that local bins be locked for health and safety reasons, including preventing messy lanes and illegal dumping. This policy has been replicated in many major cities in our country without binner consultation, significantly, restricting income opportunities and locking recyclable containers out of the recycling stream by sending them straight to landfills.

Binnners are a vulnerable population facing multiple challenges that entrench marginalization, poverty, housing insecurity, and political invisibility. Many are dealing with, or have previously dealt with,



addictions, mental health issues, physical disabilities, abuse, and/or homelessness, all of which create barriers to full social and economic inclusion.

Despite these challenges, bidders are essential for a well-functioning city, demonstrating resilience despite their contributions in the city being constantly contested. The bidder community holds enormous potential, and building bidders' capacity and acknowledging their work can have a profound positive impact on building a just and sustainable society.

### **Discussion # 1: Outcomes from improved management of non-residential packing**

The role of bidders in material recovery, and the access they require to commercial and street bins to help divert waste, must be included alongside non-residential access and material recovery efforts. Bidders' access to bins has been limited by policy decisions that overlooked their role in our city's waste diversion due to marginalization and stigma. Consistent reliable access to waste and recycling streams is needed for bidders to boost diversion and support a circular economy from repurposing, recycling, and diverting materials.

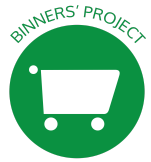
Bidder's recent participation in Metro Vancouver's solid waste management engagement survey highlighted economic incentives and the circular economy as top priorities for an updated solid waste strategy. Bidder livelihoods are supplemented through refundables, therefore an increase in refundables incentivizes bidders to divert more waste by increasing economic opportunity. While there is interest in expanding the refund system to include more paper and plastic packaging, bidders' prioritization of the circular economy highlights their interest in a system that is inclusive of more materials, with or without a refund.

Bidders contribute significantly to the circular economy through their work in refunding beverage containers, regularly sorting through public waste bins to recover bottles and cans that would otherwise go straight to the landfill.

#### *Binners' Project's waste-sorting services*

Binners' Project offers fee-for-service programs that offer the triple benefit of diverting waste from landfills, increasing economic opportunities for bidders, and fostering social inclusion. Our social enterprise programs provide event organizers and commercial and residential buildings with high-quality environmental stewardship of their waste and recycling. Bidders work either front-of-house at zero-waste stations to divert waste before disposal, or back-of-house in waste rooms ensuring waste is properly diverted by manually sorting through waste bins.

Through these programs, bidders sorted through an average of 1.7 metric tonnes of waste per week across two large back-of-house sorting sites this year. This work, alongside our back-of-house sorting services at 14 other sites, contributes to an impressive diversion rate and demonstrates the great impact our services have in helping our clients meet their waste diversion targets.



## Discussion #2: Provincial policies

Through their role as waste-pickers, and added participation in Binners' Project's Social Enterprise programs, bidders are already supporting waste diversion efforts in non-residential (and residential) sectors. Bidders experience commercial waste firsthand and have found inconsistencies across commercial sites to be challenging. Across Binners' Project's 16 sorting sites, sorting requirements vary depending on the hauler client agreements making it challenging to maximize diversion rates. Uniform disposal requirements across non-residential sites, with potential overlap with residential requirements, will promote sorting consistency and potentially increase diversion goals. Stronger regulations on waste haulers, in addition to a standardized system, will reduce confusion, promote consistency and improve diversion rates if monitored and enforced effectively. A standardized system should be prioritized, as it will take time to implement and will require wide consultation with a variety of stakeholders.

Incentives for businesses to adopt better waste diversion strategies also has the potential to improve diversion rates. This could take the form of subsidies or grants to hire companies or initiatives, like Binners' Project, that support waste diversion. Incorporating more items into the EPR system could also benefit waste diversion including the addition of coffee cups into the refund system.

### *Coffee Cup Revolution*

In the City of Vancouver, last year an estimated 82 million coffee cups were thrown away in Vancouver. Every year, thanks to sponsorship and community support, Binners' Project hosts the Coffee Cup Revolution where we invite bidders across Vancouver to participate in a pop-up depot where they can return coffee cups for a 10-cent refund.

Over the past 10 years, through this demonstration project, bidders have diverted nearly 620,000 coffee cups from the landfill, receiving over \$43,800 in refunds.

A refund system on coffee cups would both reduce the number of coffee cups in landfills and make binning more accessible to low-income people, particularly those with health issues. Coffee cups are a lighter alternative to bottles and cans, allowing those with mobility issues to participate more fully in this sector. A similar model could be considered for many other disposable items.

## Discussion #3: Extended Producer Responsibility

Across the country, comprehensive deposit-refund systems have been proven to incentivize the return and recycling of beverage containers.

These refund systems also benefit bidders by providing low-barrier income opportunities to supplement government benefits like disability payments or welfare. Since bidders face multiple



barriers to traditional employment, refund systems offer a way for bidders to positively contribute to the environment and their communities while supplementing their income.

Bidders' Project has advocated for cups to be included in the refund system through the Coffee Cup Revolution, but regardless of a refund, the event proves a need for a better recycling process for coffee cups. Coffee cups inflate waste stream volumes, take up space in our landfills and while it isn't accepted in non-residential recycling it *is* accepted in the residential system. This is an example that demonstrates the need and benefit of some overlap in accepted residential and non-residential waste.

Coffee cups are a common material bidders find at commercial sorting sites. While they can recycle them at home they are unable to do so at business sites. Bidders value and contribute to a circular economy, and coffee cups are an example of how bidders want to improve the volume and diversion of PPP in waste streams. Other common materials bidders find in waste streams include food containers, furniture, electronics, food cans, tools, and shoes, and have identified a need for more informed and improved EPR systems, preferably with an economic incentive.

#### Discussion #4: Supporting regional planning and local actions

Local engagements need to be inclusive and considerate of marginalized communities to better understand their relationship with waste and create a wider perspective on how waste is managed. 81 bidders engaged in Metro Vancouver's 2023 solid waste management survey, which brought unique perspectives on how waste is perceived and utilized by those living in poverty. Local governments are recommended to consult marginalized communities to ensure that they are not disproportionately impacted by policy decisions.

The Single Use Item Strategy is a key example of efforts to reduce waste that can impact bidders, and other marginalized communities, if not rolled out or managed correctly. When focusing on multi-use or repurposed materials in this strategy, instead of single-use items, there needs to be consideration of how those in poverty will be disproportionately impacted due to challenging conditions that reduce the ability to maintain possessions, clean reusable containers, or pay for a reusable item. The cup fee of 2022 implemented by the City of Vancouver overlooked these considerations and a consumer fee ultimately impacted bidders greatly, along with other lower socioeconomic residents. While reusable containers and other initiatives are beneficial for reducing waste for those in stable households, alternatives need to be considered for those living in poverty.



July 23, 2024



Growing Together

Preventing Waste Outside the Home Discussion Paper  
Ministry of Environment and Climate Change Strategy  
Government of British Columbia

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T: 416-695-2896 / 800-665-4232  
w: cfa.ca

VIA EMAIL: [CircularCommunities@gov.bc.ca](mailto:CircularCommunities@gov.bc.ca)

**Re: Preventing Waste in British Columbia: Non-Residential Packaging & Paper Products Discussion Paper**

Dear Sir/Madam,

The Canadian Franchise Association (CFA) welcomes the opportunity to provide its recommendations on the Ministry of Environment and Climate Change Strategy's (the "Ministry") discussion paper, "Preventing Waste in British Columbia: Non-Residential Packaging & Paper Products (the "Discussion Paper")." As the Ministry works to review the topics covered in the Discussion Paper, the CFA asks it to consider the impact any potential change may have on franchisors and franchisees across British Columbia.

Franchising is a unique licensing model that allows everyday Canadians interested in owning their own business the opportunity to do so with the support of an existing franchise system. Many franchise brands that are recognized in British Columbia, across Canada, and throughout the world are owned and operated by franchisees who live and work in their local communities. Franchise business owners are small business owners who are in business for themselves, but not by themselves.

By buying a franchise, the local franchisee gains access to a proven business concept, brand, and processes while running their own small business. In addition, the franchisor provides the franchisee with ongoing support and assistance to ensure the long-term success of the franchise, which leads to the long-term success of the franchise system as a whole. The strength of the franchise model lies in this foundational franchisor-franchisee relationship.

Franchising also makes a significant contribution to British Columbia's economy each year. In 2024, it is projected that there will be more than 9,960 franchise establishments<sup>1</sup> in British Columbia, employing 257,300 British Columbians<sup>2</sup> and contributing an estimated \$18.1 billion to the provincial GDP<sup>3</sup>. Franchised businesses in British Columbia will also contribute an estimated \$4.18 billion in federal and provincial tax revenue in 2024<sup>4</sup>.

Franchised businesses across British Columbia have worked hard to lead in environmental compliance. Many franchised businesses across more than 60 sectors have switched from plastic products to paper, enhanced recycling, led the way in the shift to extended producer responsibility, and switched to environmentally friendly products for cleaning, among other notable changes, including:

- **Plastics ban** – Many brands have already phased out the products in question. In fact, some took leadership roles in phasing out products before the government moved forward with the ban.
- **Greenhouse gas (GHG) reductions** – The franchise industry is working to reduce its GHG emissions to help meet Canada's 2030 and 2050 emissions target reductions.

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<sup>1</sup> *Canadian Franchise Industry Economic Outlook 2024 at p 8 Table 2*

<sup>2</sup> *Ibid, Table 8.*

<sup>3</sup> *Ibid.*

<sup>4</sup> *Ibid, Table 3.*

- **Waste reduction extended producer responsibility** – Many franchised brands have taken a leadership role in the transition of blue box programs toward extended producer responsibility. They are doing their part to reduce waste and create a circular economy that will help achieve Canada’s waste reduction targets.

Franchised businesses accept their position in the environmental field and will continue to lead by example. Yet despite their leadership, environmental stewardship legislation continues to specifically call out the franchising sector, treating franchise businesses differently than other non-franchised small businesses.

Many of the nearly 10,000 franchise locations across British Columbia have a gross annual profit of less than \$1 million or produce less than one tonne of packaging and paper products each year, however, they are not designated as “small producers” under the *Environmental Management Act Recycling Regulations (EMA)*<sup>5</sup>. Instead, these franchised small businesses are lumped together with their franchisor as one entity for reporting purposes. Current government policy puts franchised small business owners on an uneven playing field with non-franchised small businesses; significantly increasing annual costs and reporting requirements of the individual franchise small business owner.

The CFA believes that franchise-specific small business thresholds should be set, and that the material produced from a franchisor and franchisee be separated. This would help ensure that franchised small businesses are treated equally to non-franchised small businesses. Additionally, those franchised small businesses that would otherwise qualify as a “small producer” under the *EMA*, should be treated equally to other small business in the province. These steps would help to level the uneven playing field between franchised small businesses and non-franchised small businesses that currently exist in regulation.

Small businesses are the backbone of British Columbia’s economy, making up 98% of all businesses across the province<sup>6</sup>. While small businesses are slowly recovering from the shock of the past four years, many have not fully returned to pre-pandemic revenue levels. Small businesses continue to face increased financial strain due to ongoing labour shortages, inflationary pressure, the cost of borrowing, and the additional cost of goods and services. It is imperative that, as the Ministry contemplates further changes to the environmental stewardship rules in British Columbia, it considers the potential impact that those changes will have on small businesses across the province. Small businesses require appropriate timelines so that they have time to plan and budget for potential changes.

As the representative of franchising in Canada for more than 50 years, the CFA works with governments across Canada on issues that affect the franchise industry and small businesses. Please do not hesitate to contact the CFA to discuss this submission

Sincerely,



Derek Robertson  
Senior Manager, Government Relations  
Canadian Franchise Association

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<sup>5</sup> *Environmental Management Act, S.B.C. 2003, c. 53, sections 21, 138, and 139.*

<sup>6</sup> Statistics Canada, Business Register; Table 17-10-0005-01—Population estimates on July 1st, by age and sex; and ISED calculations.

## **Background on the CFA**

The Canadian Franchise Association (CFA) is the national, not-for-profit association of more than 600 corporate members representing over 40,000 franchise small business owners of more than 66,000 franchise establishments.

The CFA is the voice of the franchise community and the recognized authority on franchising in Canada. The CFA speaks for an industry that touches the lives of every Canadian in every community across the country.

Canadian franchises contribute more than \$120 billion per year to the Canadian economy and create jobs for nearly 2 million Canadians. They enable 78,000 Canadians to be their own boss as the owner of their own small business franchise location, serving their neighbours in communities from coast to coast to coast. These enterprises contribute over \$15.9 billion in federal taxation revenue and pay nearly \$62 billion in wages each year.

CFA members represent a diverse cross-section of businesses and over 60 sectors in Canada. Our members range from large, established franchise systems, to smaller or emerging franchise brands. Members share the conviction that their commitment to excellence improves franchising for everyone involved, including franchisors, franchisees, suppliers, and customers.

File: June 23, 2024

## Cariboo Regional District's Comments on Clean BC's Preventing Waste in British Columbia: Non-Residential Packaging & Paper Products Discussion Paper

The Cariboo RD is pleased to contribute to solutions to address the unnecessary disposal of non-residential PPP within the Cariboo, and the rest of B.C.

Discussion Questions:

1. **Are there any desired outcomes missing from this list?** – Would suggest an outcome that states Local Governments will not have to fund the management of non-residential packaging. Alternatively, it could be captured under Accountability and transparency, rather than adding a seventh outcome. Additional clarification on some of the outcomes are listed below.
  - **Prevention-first approach** lists “*waste reduction and materials reuse over recycling*” which is essential; however, the reduction of waste should not be left to consumers to execute, it should be reduced at the source and not generated in the first place.
  - **Accountability and transparency** references “*Businesses and institutions are accountable for their waste generation, management and reduction efforts.*” Any future system needs clarity on where SMEs fit into the system to ensure they have clear direction on their responsibilities and access to information. Producers could be listed in addition to businesses and institutions, and it could be clearly stated that Local Governments will not be responsible for the management costs of non-residential packaging.
  - **Access** includes “*all sectors*” and prioritizes First Nations communities; Rural and/or Remote communities in B.C. should also be clearly included.
2. **What outcomes are most relevant to your business, organization, or community?** – Prevention-first approach; Accountability and transparency; and Access.
3. **How would you prioritize these outcomes?**
  - Prevention-first approach
  - Access
  - Accountability and transparency

building communities together

**4. Are there indicators or measures of success you would suggest are used to determine if an outcome is achieved or is achievable?** Given the amount of ICI PPP entering landfills in rural and remote areas there should be a decrease in tonnes being landfilled once reduction and recycling systems are in place. Waste audits may be one of the best measures and provide data to show where ICI PPP is still being landfilled. Some other measures that may help to determine progress are:

- Packaging consumption per capita
- Recycling of packaging per capita
- Reductions in use of virgin material used in packaging
- Number of ICI locations without recycling systems for all types of packaging (not just OCC)

**5. Should non-residential packaging targets be the same, or better than existing residential packaging targets? Why or why not?**

- Not sure how this would be tracked outside of an EPR program, if EPR is the method of management, then targets should be better than residential targets; however, if the targets are not enforced, they are not meaningful.
- EPR ICI PPP targets should be higher than residential targets as 75% is too low for the residential target. Recycle BC's recovery rate for 2023 was 79.6%.

**6. What types of targets would be most useful? Reduction targets; reuse targets; recycling targets; diversion targets?**

- The Province should have mechanisms in place to limit the production of packaging that enters the market in B.C., this could be measured with reduction targets for producers, but there has to be some penalties for not reaching targets.
- Diversion targets could also be used, as they could encompass both reuse and recycling.
- It is concerning that the generation/use of laminated flexible packaging is on a year-after-year increase, replacing the use of rigid plastics and other packaging. The increase in its use may result in reduced tonnes of packaging entering the system; however, it has one of the lowest recovery rates (Recycle BC's residential recovery rate for Flexible Plastics in 2023 was only 20%) and cannot be recycled back into individual plastic resin types, resulting in an inferior recycled material with less value and use in the end market. These factors should be taken into account when considering reduction targets, to ensure the end outcome is the best for the system as a whole.

**7. Should there be regional or business specific targets in addition to provincial targets? Why or why not?**

- Ideally all EPR programs would have minimum recovery rates per Regional District (RD), rather than 75% province wide; however, determining how much residential or non-residential material is sold into each RD may not be feasible.

*building communities together*

- Outside of EPR, large retailers and chain stores should be required to manage 100% of their recyclable packaging; and limits should be placed on the use of non-recyclable packaging.

**8. How can we measure success or progress against established targets?**

- Not by implementing complicated and time-consuming reporting by sector/industry as it will be costly and not well received.
- Waste composition studies for all regional landfills could provide the necessary data, but funding formulas would have to be developed to ensure that local governments were not taking on all the costs.

**9. What actions are best suited at the local, regional, or provincial level of government?**

- Any product/packaging use bans should be actioned at the provincial level.
- Implementation of EPR programs must be actioned at the provincial level.
- Requirements for ICI generators of PPP to recycle, reuse or redesign their packaging outside of an EPR program must also be regulated by the province.

**10. What factors should be taken into consideration if the Province enables or promotes local actions?**

**11. What is already working to prevent packaging waste – for businesses, institutions, haulers, local governments?**

- Aside from small businesses using the residential program under the guise of residential material, not much.

**12. Are there other actions that should be considered? What are they?**

- EPR, as discussed in the following section.

**13. What are the benefits or limitations of these waste prevention options?**

- May need a combination of all or parts of them for a robust and effective system.
- Challenge will be designing a system that is cost effective, so that it does not deter producers and businesses from operating in B.C.

**14. How ready are organizations, businesses, governments to implement?**

- Some will be more ready than others, a phased approach will help to alleviate this.

**15. How should implementation be prioritized?**

- Disposal bans for packaging materials
- List of designated recycled materials and supporting actions
- Standardized waste prevention and management actions for businesses and institutions
- Provincial data standardization and sharing

**16. What are the benefits or limitations of expanded EPR options?**

- EPR is already in place and well understood
- Provides a funded system that does not overly burden local governments
- Should provides incentives for producers to re-design, reduce and improve packaging

**17. How ready are organizations, businesses, and governments to implement an expanded form of EPR?**

- Cannot speak for the ICI sector, but we receive calls from businesses wanting to recycle, but unable to find a business that will take their recyclables for rates comparable to waste tipping fees.
- If a funded system was accessible, implementation could be completed within a few years using a phased approach.

**18. Are there sectors or materials that should prioritized to be included or excluded?**

- The option to include rural generated ICI OCC into the existing residential PPP collection system should be considered.
- Consider including small rural and First Nation community ICI PPP of less than XX tonnes per year into the existing residential PPP collection system.
  - i. Currently 20% of residential PPP is not being collected; allowing ICI PPP materials from small rural and First Nation communities into the residential program would make up for the material not be collected.
- Include OCC in the North and remote areas of the province.
- Plastics should be prioritized after OCC.
- Schools, hospitals, care homes etc... should be included in EPR.
- Agriculture plastics need their own EPR program.

**19. How should implementation of EPR actions be prioritized (e.g. by sector, by material, by geographic location)?**

- Rural areas of BC should be prioritized, followed by larger population centers in central and northern BC who do not currently have access to ICI PPP.

Thank you for the opportunity to provide comments on this topic, I look forward to the ministry's decision on the policy approaches to be taken to address ICI PPP in B.C.

Yours sincerely,

Tera Grady  
Manager of Solid Waste

*building communities together*

Toronto, July 23, 2024

Ministry of Environment and Climate Change Strategy  
Parliament Buildings Victoria, BC V8V 1X4  
Sent via email to: circularcommunities@gov.bc.ca

**Re: Preventing Waste in British Columbia: Non-Residential Packaging & Paper Products Discussion Paper**

To Whom It May Concern,

Carton Council Canada (CCC) is a coalition of food and beverage carton manufacturers working together to deliver long-term solutions to help increase carton collection and recycling in Canada. CCC helps increase carton collection and recycling by:

- Financing and producing carton-recycling awareness campaigns
- Providing resources to optimize sorting processes
- Financing pilot projects
- Connecting sellers and buyers of recycled carton bales
- Supporting the development of new end markets for used cartons

In B.C., beverage cartons are collected via the deposit return system (DRS) operated by Encorp Pacific (Return It) while cream, broth, soup, and other non-beverage cartons generated in the residential sector are collected via the residential program for packaging and paper products (PPP) operated by RecycleBC.


Cartons can be recycled through either of the following processes<sup>1</sup>:

**Path 1 – Paper Mill:** At the paper mill, cartons are placed into a hydropulper that uses water and friction to break the cartons down into their component parts (fibre, plastic and aluminum). The pulp is used to make paper products such as paper towels, tissue and office paper.

**Path 2 – Building Material Plant:** Instead of a paper mill, cartons can be sent to a recycling company that turns them into sustainable building materials. Cartons are shredded, then heat is applied, and they are pressed back together into large sheets,

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<sup>1</sup> Refer to our web site for a more in-depth overview of the carton recycling process.

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



which are used mainly as commercial roofing or wall board. This process uses the whole carton, including caps and closures.

There are six<sup>2</sup> carton recyclers in North America, including four paper mills and two plants making building materials (full-carton recycler)<sup>3</sup>. Used cartons can also be recycled in export markets.

Thank you for the opportunity to submit comments on the recently released discussion paper pertaining to Non-Residential Packaging and Paper Products.

### **Proposed desired outcomes from improved management of non-residential packaging, including plastics and paper products**

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CCC generally supports the desired outcomes presented in the discussion paper. We are particularly supportive of the following two outcomes as they are most relevant to carton recycling: Consistency and confidence, and Accountability and transparency.

In the case of the former (**consistency and confidence**), providing consumers with the opportunity to recycle all PPP regardless of where the recycling action takes place (home, work, school, play, etc.) would help grow recycling in general, including carton recycling.

In the case of the later (**accountability and transparency**), requiring haulers and operators of Material Recovery Facilities (MRFs) that process materials from the ICI sector to report the types and amounts of PPP collected for recycling would provide the necessary data to understand current performance and to identify areas requiring improvement.

### **Proposed Policy approaches to address non-residential packaging**

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CCC supports the following policy options, as listed in the discussion paper, as they are the most likely to support carton recycling:

- **List of designated recycled materials and supporting actions:** in addition to ensuring cartons are part of the list, we support mandatory recycling requirements for ICI generators, in particular schools, long-term care homes, public parks & campsites, and small businesses. This includes the obligation to have a source separation program in place, and to procure recycling collection services.

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<sup>2</sup> A seventh carton recycler has been announced for the second half of 2025. See <https://resource-recycling.com/recycling/2024/07/16/planned-carton-facility-will-create-west-coast-end-market/>

<sup>3</sup> More information on who they are and where they are located is also found on our web site.

- **Disposal bans for packaging materials:** all packaging materials for which recycling end-markets exist, including cartons, should be part of the list of materials that are banned from disposal.
- **Provincial data standardization and sharing:** as previously mentioned, we support a requirement for haulers and any other entity involved in ICI recycling service delivery to disclose publicly the types and volumes of PPP collected. As reported by Encorp Pacific in its 2023 Annual Report<sup>4</sup>, a portion of beverage containers, including cartons, are managed in the IC&I stream but are unaccounted for in the DRS reporting. Encorp Pacific has been working with a few IC&I collectors to sample their loads and quantify the number of DRS containers that are managed in this channel. This is a time-consuming and resource-intensive process however, and not all ICI service providers are willing to participate. Mandating ICI haulers to report this information to the province would address this data gap.

On a separate but related point pertaining to the development of standardized categories for waste audits, CCC recommends that cartons be tracked under the categories of beverage cartons and non-beverage cartons, as opposed to gable top and aseptic cartons, given that gable top and aseptic are collected, sorted, and recycled together and that from a consumer's perspective, the content (beverage or non-beverage) is what determines how to recycle the carton (return to a depot or place in recycling bin).

Thank you for this opportunity to provide comments on the Non-Residential Packaging & Paper Products Discussion Paper. We look forward to working with the Ministry to increase recycling and transition to a more circular economy. If you have any questions, please do not hesitate to contact me.

Regards,



Isabelle Faucher  
Managing Director, Carton Council of Canada

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<sup>4</sup> Refer to p.15

July 24, 2024

Ms. Gwendolyn Lohbrunner  
Senior Director, Circular Communities  
Ministry of the Environment and Climate Change Strategy  
PO Box 9341 Stn Prov Govt  
Victoria BC  
V8W 9M1  
Canada

Via e-mail: [CircularCommunities@gov.bc.ca](mailto:CircularCommunities@gov.bc.ca); [Gwendolyn.Lohbrunner@gov.bc.ca](mailto:Gwendolyn.Lohbrunner@gov.bc.ca)

Dear Gwendolyn,

**Subject: CCSPA Submission on the Discussion Paper on Preventing Waste in British Columbia: Non-Residential Packaging and Paper Products**

The Canadian Consumer Specialty Products Association (CCSPA) is a national trade association that represents 42 member companies across Canada that manufacture, process, package and distribute consumer, industrial and institutional specialty products, such as soaps and detergents, pest control products, aerosols, hard surface disinfectants, deodorizers and automotive chemicals. We are a \$5.5 billion industry directly employing over 8,000 people, with annual exports of \$2 billion.

CCSPA and our members have been fully engaged in all aspects of post-consumer waste developments across Canada. We have provided comments in response to many provincial Packaging and Printed Paper (PPP) and Hazardous and Special Products (HSP) programs across the country. Additionally, CCSPA is a member of the Industry Advisory Council for the Ontario Resource Productivity and Recovery Authority (RPRA) and the Association Committee for Eco Enterprises Quebec (EEQ).

On April 23, 2024, the Ministry of the Environment and Climate Change Strategy published [Discussion Paper on Preventing Waste in British Columbia: Non-Residential Packaging and Paper Products](#) (Discussion Paper) and launched a corresponding three-month consultation. The Ministry hosted information sessions on May 14-15, 2024, and stakeholder workshops on June 11, 2024, and June 19, 2024.

The Discussion Paper serves to inform and promote the discussion of efficient and effective solutions to non-residential (ICI) packaging waste. As part of the Ministry's [Extended Producer Responsibility Five-Year Action Plan 2021-2026](#), a policy approach to ensure improved recovery and recycling of ICI packaging and paper is to be identified in 2025.

### **Introductory Comments**

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<http://www.ccspace.org>; <http://www.healthycleaning101.org>

Page 1 of 4

CCSPA and our members welcome the opportunity to provide feedback to the Ministry to support improved recovery and recycling of ICI packaging and paper. We appreciate the context and perspective provided in the Discussion Paper on potential policy approaches. CCSPA appreciated the opportunity to participate in the information sessions and stakeholder workshops.

CCSPA members are proactive environmental stewards with a history of successful packaging waste reduction initiatives across Canada. CCSPA supports efficient and effective approaches towards a circular economy for ICI packaging in British Columbia. Our key comments and recommendations on the Discussion Paper are as follows:

### **Proposed Outcomes**

The Ministry has proposed six desired outcomes for improved management of ICI packaging, based on guiding principles of a clean environment, a circular economy, and reconciliation with Indigenous Peoples. The proposed desired outcomes are intended to support policy approaches that consider the entire lifecycle of ICI packaging.

CCSPA members are stakeholders throughout the lifecycle of ICI packaging, as both manufacturers and consumers of ICI packaging and products. CCSPA supports the guiding principles of the Discussion Paper in delivering efficient and effective solutions for the management of ICI packaging. CCSPA members are proactive in supporting a circular economy and see a valuable role for the Ministry in ensuring all ICI businesses are aware of the importance and availability of ICI packaging management programs in British Columbia.

As the Ministry has noted, the managing of ICI packaging is a complex issue which impacts a range of sectors and waste streams. As such, it is imperative the Ministry meaningfully engage and educate ICI businesses on management opportunities which align with the guiding principles of the Discussion Paper. In response to the discussion questions 1 to 4 of the Discussion Paper, CCSPA provides the following recommendation:

- ***CCSPA recommends that the Ministry adopt “Business Education and Awareness” as a desired outcome.*** Business Education and Awareness would provide the foundational, priority outcome for the ICI packaging management and lend itself to clear Ministry campaigns with performance indicators (e.g., opinion surveys) which support the other desired outcomes.

### **Possible Approaches**

The Discussion Paper considers opportunities and possible approaches to support the management of ICI packaging. Four categories of approaches have been identified including provincial target setting, regional planning and local action, provincial policies, and extended producer responsibility (EPR). The Ministry has highlighted the existing provincial target for per capita municipal solid waste disposal and the provincial role in supporting uniformity amongst local government action to support solid waste management.

CCSPA members are proactive stewards in provincial EPR programs for packaging and leaders in national efforts to support the circular economy. CCSPA supports the Ministry’s role, and applauds its historical progress, in delivering against the provincial target (350 kg per person per year) for solid waste disposal

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Page 2 of 4

waste in British Columbia. Furthermore, CCSPA echoes the observation of the Ministry that policy approaches for ICI packaging consider the important factors of simplicity and uniformity.

The Ministry can incorporate the established provincial target for solid waste and leverage ongoing collaboration between businesses and regional governments. For ICI packaging, the Ministry can support outcomes on solid waste by educating businesses and regional governments on the existing actions and best practices. In response to the discussion questions 5 to 19 of the Discussion Paper, CCSPA provides the following recommendations:

- **CCSPA recommends that the Ministry utilize the existing provincial target for per capita solid waste disposal when considering ICI packaging.** The existing target provides a simple and outcome-based target that can account for the significant differences and complexity of ICI packaging types and waste streams. Additionally, the existing provincial target would continue to allow a degree of localized solutions based on regional differences and business needs.
- **CCSPA recommends the Ministry establish a list of designated recycled materials and all existing regional supporting actions.** Consistent with the desired outcome of Business Education and Awareness, a list of recyclable materials in British Columbia and regional supporting actions provides necessary context for businesses to make informed environmental decisions for ICI packaging. Furthermore, regional governments could benefit from increased awareness of local programs and reference best practices for ICI packaging from across the province.
- **CCSPA recommends the Ministry does not expand EPR to include ICI packaging.** As noted throughout the Discussion Paper, the management of ICI packaging is a complex mix of sectors and waste streams. The complexity prevents a single EPR solution from being efficiently or effectively operated for ICI packaging. In Canada, only Quebec is adopting EPR broadly for ICI packaging in Canada which is facing serious challenges ahead of its program start in 2027. CCSPA is working with EEQ, as a member of its Association Committee, to navigate significant operational and logistical barriers to the development and implementation of a feasible program in Quebec.

### **Summary and Next Steps**

CCSPA shares the Ministry's goal of supporting a clean environment and circular economy. To this end, CCSPA has made four recommendations which build upon the success of existing government actions on solid waste and lessons learned from other jurisdictions. The Ministry plays a pivotal role in educating ICI businesses and supporting consistency amongst regional actions.

CCSPA and our members appreciate the opportunity to provide feedback on the provincial policy approach to the management of ICI packaging. We look forward to continued engagement and the identification of a policy approach in 2025. Please feel free to contact CCSPA if we can provide any further information.

Sincerely,

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Page 3 of 4



Simon Kinsman  
Director of Regulatory Affairs

cc: Avery Gottfried, Senior Policy Specialist, Ministry of the Environment and Climate Change Strategy  
Erin Prescott, Senior Policy Specialist, Ministry of the Environment and Climate Change Strategy

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Page 4 of 4

# CFIB submission to the discussion paper *Preventing Waste in British Columbia: Non-Residential Packaging & Paper Products*

*Jairo Yunis, Director, British Columbia and Western Economic Policy  
Emily Boston, Senior Policy Analyst, British Columbia*

## Introduction

The Canadian Federation of Independent Business (CFIB) is a non-profit, non-partisan business association with 97,000 members across Canada and 9,700 in British Columbia. We are Canada’s largest organization exclusively representing the interests of small and medium-sized businesses from a variety of industries. CFIB appreciates the opportunity to provide comments on the *Preventing Waste in British Columbia: Non-Residential Packaging & Paper Products* discussion paper and contribute to this important conversation.

Waste prevention is a top issue for many Canadians, governments, and businesses working towards a greener future. Small business owners care about protecting the environment and make efforts to reduce their environmental impact, but struggle with policies and regulations that unfairly burden their ability to remain competitive, create jobs, and innovate. While we appreciate the province's commitment to a circular economy and sustainable waste management, it is crucial to implement policies that are practical, flexible, and supportive of small businesses.

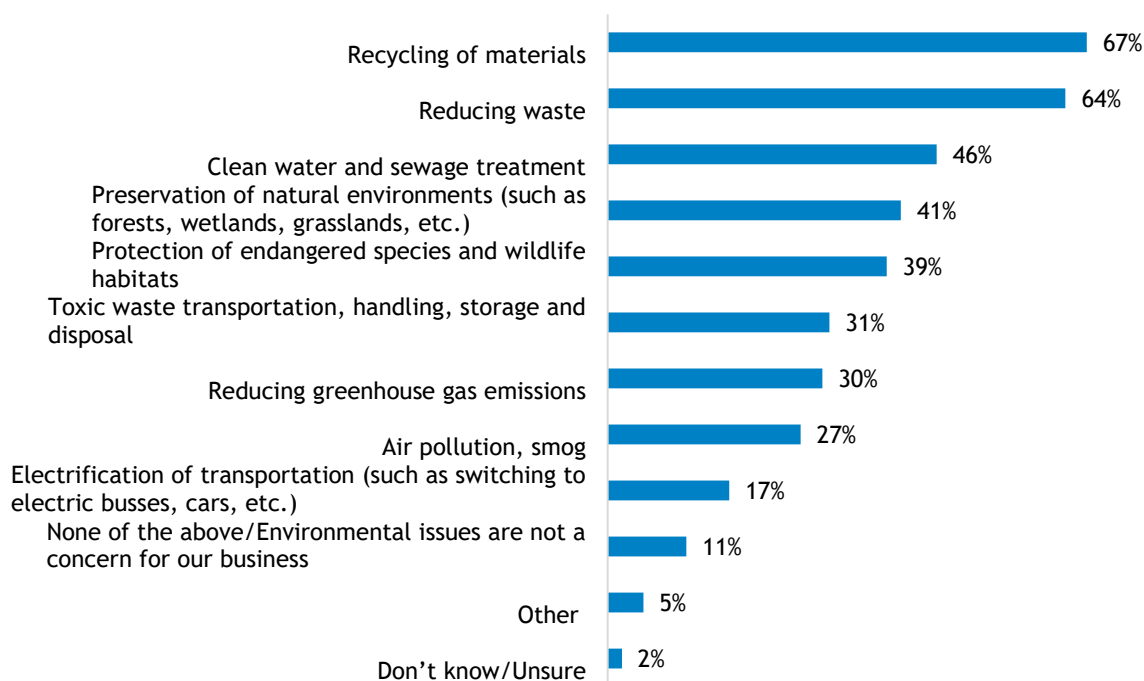
This submission outlines the relationship between BC small businesses and the environment, the current economic context, and shares the small business perspective on the discussion paper on non-residential packaging and paper products.

## BC small businesses take action to reduce their environmental impact

Small businesses in BC are committed to environmental sustainability and are already taking steps to reduce their environmental impact. In fact, it’s something they take pride in; over half (58%) of small businesses say they contribute to their community by offering environmentally conscious practices or products<sup>1</sup>. There are many ways small businesses take action to reduce their environmental impact, but waste reduction and material recycling are among their top strategies (Figure 1).

Figure 1

*Which of the following environmental issues are the most important to you and your business? (Select all that apply)*



<sup>1</sup> Source: CFIB, Retail Local Contributions survey, May 17-June 14, 2023, final results, n = 588, BC = 98



Source: CFIB, Environmental Survey - August 2022, August 15 - September 9, 2022, Final results, BC=524

Despite this commitment, small businesses face several barriers to increasing their spending on environmental priorities (Figure 2). First, small business owners are often juggling so many priorities that directly impact their livelihoods, like paying down debt or increasing compensation, leaving them with insufficient time or resources to prioritize environmental issues. Additionally, uncertainty about the impact of environmental investments, limited time and resources to implement changes, and a lack of information and access to practical and cost-effective alternatives further hinder their efforts.

Figure 2

*What are the biggest barriers to implementing or making further investments in environmentally conscious initiatives in your business? (Select all that apply)*



Source: CFIB, Your Voice Survey - August 2022, August 15 - September 9, 2022, Final results, BC=485

### Economic challenges limit BC small businesses

Small businesses face significant financial barriers when attempting to take further environmental action, and these challenges are exacerbated by the difficult economic environment in which they operate. As the province grapples with sluggish economic growth, dwindling business investment, large public deficits, and stringent regulations, small businesses are looking for ways to alleviate their cost burdens - not pile more on. These economic factors create an atmosphere of uncertainty and financial strain, severely impacting business confidence and decision-making.

CFIB's Monthly Business Barometer<sup>®</sup>, which tracks the short-term (3 months) and long-term (12 months) confidence of small businesses in the economy, reveals a bleak outlook. Right now, BC small businesses short term optimism is dismally low, sitting at only 50 points. Their long-term

outlook isn't much better, with their optimism sitting at 55.3 points - 7 points below their historic average.

Based on our Barometer results, small business owners cite their major cost constraints as wage costs (76%) and tax and regulatory costs (75%). Notably, British Columbia has the second highest payroll costs in Canada, trailing only Quebec, which has its own pension system. Factors contributing to BC's high payroll costs include mandatory employer-paid sick days (the only one in the country), higher WorkSafeBC premiums, and Canada's highest minimum wage (\$17.40/hour).

Adding to these challenges, small businesses face significant red tape and compliance issues. The increasingly complex landscape of regulatory requirements is difficult and costly for small businesses to navigate. These administrative burdens consume valuable time and resources that small businesses could otherwise invest in growth and innovation. The cumulative effect of these compliance costs further exacerbates the financial pressures faced by small businesses, making unreasonable to add additional regulatory and cost burdens at this time.

## Discussion questions

### 1. Are there any desired outcomes missing from this list?

From a small business perspective, the proposed outcomes overlook three key objectives:

- a) Flexibility- Small businesses operate under diverse conditions, with varying resources, capabilities, and waste generation patterns. A rigid regulatory framework that mandates uniform compliance will disproportionately burden small businesses that lack the economies of scale enjoyed by larger businesses. Having flexibility as one of the desired outcomes will encourage small businesses to adopt more tailored approaches to waste reduction that suit their unique operations. Specifically, this could include phased compliance timelines, sector-specific guidelines, or alternative and less stringent compliance methods that recognize the distinct challenges faced by different types of small businesses.
- b) Cost-efficiency- While access to waste management options is important, the primary concern for small businesses is the cost associated with these services. A framework that prioritizes cost efficiency ensures that waste management practices are financially viable for small businesses. This involves providing affordable waste reduction, recycling, and disposal options that do not impose a significant financial and/or administrative burden. While some of these themes are explored in the "Access" outcome, it's important to have cost efficiency as an explicit desired outcome to help small businesses comply with regulations without jeopardizing their financial stability.
- c) Support- Navigating new packaging and paper product waste management regulations can be challenging, especially for small businesses with limited administrative and technical resources. Comprehensive implementation support is essential to help these businesses understand and comply with new rules, programs, and targets. This support could come in the form of detailed guidelines, training programs, and one-on-one assistance. Having support as a desired outcome will help in reducing the compliance burden on small businesses, ensuring they have the tools and information needed to successfully meet waste reduction targets.

### 2. What outcomes are most relevant to your business, organization, or community?

The three outcomes outlined in our previous answer (flexibility, cost-efficiency, and support) are those that are most relevant to small businesses and that will determine their success in adopting waste prevention and reduction strategies. These outcomes address the unique challenges faced by small businesses and provide a pathway for them to contribute to environmental sustainability in a practical and manageable way.

While these three outcomes are what small businesses would like to see prioritized, it's worth noting that the current *accountability and transparency* outcome does not align with the small business perspective. Introducing *accountability* as an outcome creates a perception of distrust and places an undue burden on small businesses. This could be interpreted as assuming non-compliance or negligence on the part of small businesses, which can undermine the collaborative spirit necessary for effective waste management.

In addition, the use of "*ambitious waste prevents targets*" in the *accountability and transparency* outcome raises alarms for small business owners given the current economic context of restrictive access to capital, lower economic activity, labour shortages, higher wage pressures, pandemic-related debt repayment, high energy taxation, and many other factors putting pressure on the cost of doing business in the province. Flexibility in the timing and ways small businesses comply with targets will help them prevent and reduce packaging and paper product waste.

### 3. How would you prioritize these outcomes?

While small businesses feel the impacts of new regulations and policies in many ways, there is a clear hierarchy of how they can be best supported as regulations evolve, in order of importance:

- Cost efficiency
- Flexibility
- Support
- Access
- Maximize Material Recovery
- Consistency and Confidence
- Accountability and Transparency
- Prevention-First Approach

That said, a holistic approach that considers the unique constraints of small businesses is the most effective way to approach any future decisions.

### 4. Are there indicators or measures of success you would suggest are used to determine if an outcome is achieved or is achievable?

We believe the framework should incorporate two measures that would track the success/failure of achieving these outcomes while providing room for adjustment:

- *Cost impact analysis*: Regular assessments should be conducted to measure the financial impact of waste management regulations on small businesses, ensuring that costs remain manageable and do not threaten their viability.
- *Disparity analysis*: Before implementing regulations, measure the projected proportional impacts on how new regulatory burdens will affect small businesses compared to larger businesses, which have more flexibility to adapt to changing regulations.
- *Compliance survey*: Regular surveys should be conducted to identify the share of small businesses struggling to comply with the regulations, providing insights into the challenges faced and informing adjustments to make the regulations more practical and supportive.

### 5. Should non-residential packaging targets be the same, or better than existing residential packaging targets? Why or why not?

First, the concept of "better" in this context needs careful definition and clarification. It should be based on achievable and realistic standards that recognize the specific challenges faced by the commercial sector, rather than arbitrary benchmarks that do not consider the operational realities of many BC small businesses. In sum, what is "better" and who defines what "better" is or isn't? This rather arbitrary language makes it difficult to properly answer this question.

Assuming “better” equates to “more rigorous,” non-residential packaging targets should not necessarily be set at the same or higher standards than residential targets due to several important factors that reflect the unique circumstances faced by small businesses:

Unique challenges- Non-residential sectors, particularly small businesses, operate under distinct conditions compared to residential contexts. The nature of commercial packaging involves different volumes, types, and usage patterns, which makes uniform targets impractical and often unrealistic. Differences in targets for residential and non-residential packaging and paper products should reflect these considerations.

Economic challenges- Imposing more stringent targets on non-residential packaging could place an undue financial burden on small businesses already grappling with escalating costs. The current economic climate in British Columbia has made it exceptionally costly to run a business, and additional regulatory pressures could further strain their financial stability.

Voluntary compliance and flexibility- Ideally, targets should be optional rather than mandatory. If the regulatory framework includes strong incentives, practical support, and clear guidance, businesses will be more likely to adopt sustainable practices voluntarily. This approach respects the financial constraints of small businesses and fosters a more collaborative and supportive regulatory environment. In addition, regulations should allow for different methods and timelines for compliance based on each business’s unique situation, rather than imposing a one-size-fits-all approach.

Impact on the economy- To reiterate, targets for commercial packaging and paper waste should be voluntary, flexible, and significantly less stringent than those for residential waste, reflecting the essential role that small businesses play in BC’s economy. Small businesses are the backbone of the provincial economy, generating thousands of jobs and driving value and prosperity across communities. Imposing rigid, stringent targets could place an undue burden on small businesses, potentially undermining their ability to contribute to economic growth.

## **6. What types of targets would be most useful? Reduction targets; reuse targets; recycling targets; diversion targets?**

Any targets introduced for commercial packaging and paper waste should be both voluntary and flexible. It is essential that these targets account for the existing recycling and diversion infrastructure, the associated costs, and the resources available to small businesses. Rigid, one-size-fits-all targets are impractical and could place undue burdens on small businesses already struggling to cope with a difficult economic environment. Whether focusing on reduction, recycling, or diversion, the framework should be designed to accommodate the diverse needs and capabilities of small businesses, allowing them to implement solutions that best fit their operational realities.

## **7. Should there be regional or business-specific targets in addition to provincial targets? Why or why not?**

If regional or business-specific targets are introduced, it’s **essential to ensure fairness by preventing a one-size-fits-all approach that might disproportionately impact smaller businesses.** As mentioned in Question 4, a disparity analysis should be conducted to ensure any business-specific targets include different, more reasonable targets for small businesses. Provincial targets, while providing a general framework, may not adequately reflect the diverse circumstances of individual local businesses.

It is important to note that different regions and types of businesses possess varying capabilities and resources for managing waste. Regional conditions, such as local waste management infrastructure and recycling facilities, can influence how effectively waste can be handled. For example, urban areas may have more advanced recycling programs compared to rural regions, which could affect the feasibility of meeting uniform provincial targets. This strategy may impose unrealistic targets on businesses and make it difficult for them to comply.

## 8. How can we measure success or progress against established targets?

Progress should be measured by:

- **Economic impact assessments:** Evaluating the financial burden on small businesses and the impact of these targets on the economy.
- **Compliance costs:** Tracking the costs incurred by small businesses in meeting these targets.
- **Tangible value:** In a recent CFIB survey, 39% of BC small businesses (Figure 2) indicate that they are uncertain any regulatory changes will make a meaningful difference. It's frustrating for small businesses that, time and time again, are forced to comply with rapidly changing rules and regulations only to be left unsure how their efforts are contributing to reduced environmental impacts.

## 9. What actions are best suited at the local, regional, or provincial level of government?

Given the broad scope of this discussion paper and the complex overlaps in BC waste management, assigning specific responsibilities to different levels of government is unrealistic. However, small businesses often face difficulties due to split accountability between various government levels on complex policy issues, such as packaging and paper products. To address this, the actions assigned to each level of government should be clearly defined and effectively communicated to small businesses. This includes communicating any significant process changes that small businesses may already be familiar with. This ensures that they know the appropriate avenues for inquiries or feedback. Additionally, the framework should incorporate flexibility to allow for a bottom-up approach tailored to the unique needs of each region.

### Exploring provincial policies

While we recognize the good intentions behind specific policies to manage non-residential packaging waste, we have several concerns regarding the practicality, impact, and potential non-intended consequences of strategies like:

Disposal bans- Bans are often inflexible and do not account for the diverse needs and capacities of different sectors. For instance, small food retailers may find it challenging to switch to alternative packaging without compromising product quality or increasing costs. Some might have to increase prices to offset these costs, ultimately hurting British Columbians and the overall economy. Waste reduction policies should provide flexibility and consider sector-specific challenges to avoid unintended economic consequences. In sum, implementing disposal bans on certain packaging materials could significantly impact small businesses. Many small businesses lack the resources to quickly adapt to such bans and could lead to increased operational costs and potential supply chain disruptions.

Reuse requirements- Mandating reuse can impose high compliance costs and administrative burdens, particularly on small businesses with limited resources. Small businesses might struggle to implement reusing systems without significant financial investment and logistical challenges. Encouraging reuse through incentives rather than mandates could be more effective. Programs that include financial incentives for those businesses successfully implementing reuse systems may encourage innovation and voluntary adoption of reusing practices without imposing undue burdens.

Waste prevention plans- Requiring small businesses to submit waste prevention plans and conduct audits adds to their already incredibly high administrative workload and will increase compliance costs. Small businesses do not have the capacity to handle these additional requirements, given their limited resources, knowledge, and time.

Environmental policies that mandate bans, requirements, and add administrative compliance costs are typically less successful. Such policies can stifle innovation and create resistance among stakeholders, including consumers. On the contrary, policies that align incentives, provide flexibility, and use market-based mechanisms tend to be more successful. These approaches

encourage voluntary compliance and foster innovation, leading to more sustainable and effective outcomes.

## Extended Producer Responsibility Programs

Limitations of expanded EPR options- There are several challenges associated with expanded EPR options. For small businesses, the additional administrative and financial burden of participating in an expanded EPR program could be significant. The cost of compliance, reporting, and adapting to new recycling requirements may outweigh the perceived benefits, particularly for micro and small businesses with limited resources.

EPR implementation readiness- Readiness for implementing an expanded form of EPR varies widely among the diverse non-residential sectors. Larger organizations and municipalities may have the resources and infrastructure in place to adapt more readily to expanded EPR requirements. In contrast, small businesses may find the transition challenging due to limited financial and administrative resources.

The BC government will need to provide substantial support, including clear guidelines, financial incentives, and technical assistance, to ensure successful implementation. Without such support, the burden of compliance may disproportionately affect smaller businesses.

## Conclusion

We appreciate the province's commitment to advancing a circular economy and promoting sustainable waste management. We also value the opportunity to contribute our insights on this discussion paper.

The current economic climate in British Columbia presents significant challenges for many small businesses, which are already grappling with the issues outlined earlier. Introducing new compliance costs and administrative requirements could further strain their resources. While small businesses are committed to environmental sustainability, they often lack the capacity to evaluate the impact of their investments on environmental outcomes effectively. If these policies are perceived as imposing additional costs without clear benefits, their support is likely to diminish.

As we move forward, it is crucial to implement policies that are not only practical and flexible but also supportive of small businesses. Avoiding rigid bans, encouraging voluntary reuse, reducing administrative burdens, and offering tailored support will help us achieve our waste reduction goals while sustaining a vibrant and resilient economy.

Thank you for considering our feedback. We look forward to collaborating on the development of effective and sustainable waste management policies that advance environmental goals and support small businesses.



July 18, 2024  
File: 10-6370-01/2024-Vol 01

**Environmental Programs**  
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Richmond, BC V7C 5B2  
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Via Email: [CircularCommunities@gov.bc.ca](mailto:CircularCommunities@gov.bc.ca)

Ministry of Environment and Climate Change Strategy  
Waste Prevention Regulation  
PO Box 9341 Stn Prov Govt  
Victoria, BC V8W 9M1

**Attention: Ministry of Environment and Climate Change Strategy – Waste Prevention Regulation**

Dear Ministry of Environment and Climate Change Strategy Staff:

**Re: Preventing Waste in British Columbia: Non-Residential Packaging & Paper Products Discussion Paper**

Thank you for the opportunity to provide feedback on the *Preventing Waste in British Columbia: Non-Residential Packaging & Paper Products Discussion Paper*.

The City of Richmond is encouraged by, and further supports, the provincial government initiating conversations around the issue of non-residential packaging and paper products, and on how to properly address waste generated by the industrial, commercial and institutional sector. As a municipal government, the City's authority to regulate within this sector is limited, however, businesses and residents do regularly contact the City for direction on how to properly handle non-residential items at end-of-life. Guidance and leadership from the provincial government will provide consistent and clear messaging that is welcomed at the local level.

On April 24 2023, the City adopted the *Richmond Circular City Strategy (RCCS)*, which places the City at the forefront of enabling a transition to a circular economy by integrating new and existing policies, building capacities, collaborating and engaging stakeholders, and stimulating innovation and participation across the food system, business, mobility, built environment and materials management sectors. The RCCS details the principles, directions, goals, and actions, that the City and its partners will focus on to reach Richmond's vision of a circular city that maximizes the value of resources, by design, through responsible consumption, minimizing waste and reimagining how resources flow in a sustainable, equitable, low-carbon economy. Through the RCCS, the City has committed to continually collaborate with key stakeholders such as commercial business and the waste management industry to implement the actions, monitor progress, and ultimately create a circular economy that benefits all and leads the way in Canada.

Further, in May 2024 the City launched the *Business Recycling Resources Program* (BRRP) pilot, which is designed to provide Richmond businesses with free support, tools and information so they can recycle more effectively and reduce waste going to the landfill. The BRRP pilot was developed in response to input from local businesses, organizations and waste hauling companies that participated in the City's Commercial Recycling Services Review. The program is a mix of free resources including:

- A business waste site assessment to better understand a business' current practices and provide practical steps to implement and improve sustainable waste management practices.
- In-person and online workshops by industry experts on how to recycle correctly, contract a waste hauler and better understand the reuse and refill options to help support a circular economy.
- A selection of downloadable PDFs that provide tips and guidelines that businesses can utilize independently or in combination with City support, including:
  - Tools for creating a plan to recycle more and reduce waste, including how to sort and recycle correctly and a checklist for creating a recycling and waste reduction plan.
  - An overview of bylaws and regulations that affect businesses, including banned materials and tips to deter illegal dumping, unsightly premises and rodents.
  - Easy-to-use tools to calculate and assess waste to gain a better understanding of current waste diversion and composition to help identify recycling requirements and opportunities to reduce waste.
  - Tips for what to consider when contracting a waste hauler, how to handle waste costs effectively and other related resources.

After the one-year pilot, staff will report back to Council with program findings and provide recommendations as appropriate.

While the focus of the BRRP pilot is to provide businesses with guidance and free support tools, initial response from engaging with business has found that overall businesses welcome the education and understand the need to appropriately manage their waste and recycle correctly. However, without bylaws or regulations in place, many are unwilling to make adjustments unless requirements are enforced.

Further, the proposed policy levers shared in this Discussion Paper align with the City's programs and will provide clarity and consistency for the Richmond business community. With the understanding that a number of policy levers will need to be utilized to properly address the variation of materials that can be found within non-residential packaging and paper, City staff have provided answers to the questions posed in the Discussion Paper in Attachment 1.

We appreciate you taking the time to review the City of Richmond's feedback. Should you have any questions or concerns, please feel free to contact the undersigned at 604-244-1280 or [knishi@richmond.ca](mailto:knishi@richmond.ca). For more information on the City initiatives mentioned please visit [richmond.ca/recycle](http://richmond.ca/recycle).



Kristina Nishi  
*Manager, Recycling and Waste Recovery*



## City of Richmond Feedback – Preventing Waste in British Columbia: Non-Residential Packaging & Paper Products

### 1. Are there any desired outcomes missing from this list?

- **Innovation and research:** Foster innovation in product and packaging design to encourage reduction by utilizing the Golden Design Rules for Plastic Packaging, aiming to reduce waste, utilize recycled materials, and prioritize ease of repair.
- **Harmonization:** Promote harmonization across sectors and jurisdictions to reduce complexity and increase consistency for businesses and consumers. This includes standardizing recycling practices, regulations, and product design guidelines to support a unified approach to sustainable packaging.
- **Environmental impact reduction:** Examine environmental impacts caused by recycling, incineration, landfills, plastic production, waste management, etc., and prioritize solutions that enhance climate resilience. This includes mitigating climate impacts and adapting to climate change effects in packaging and waste management strategies.

### 2. What outcomes are most relevant to your business, organization, or community?

The City of Richmond (the City) focuses on ensuring effective waste management practices that enhance environmental sustainability, promote community well-being, and support a circular economy. Key outcomes include:

- **Prevention-first approach:** Following the foundation of the *Richmond Circular City Strategy* (RCCS), the City strives to encourage individuals and businesses to rethink their waste, identifying if materials are required or if the item is unnecessary and can be refused. If necessary, the next step is to keep materials out of landfills and utilize them at their highest and best use for as long as possible. Prioritizing reuse and repair over recycling are also key priorities for the City to move materials up the pollution prevention hierarchy.
- **Consistency and confidence:** Maintaining consistent and reliable waste management practices instills confidence in residents and businesses alike. This also involves ensuring that chosen policy levers are equitable and provide a level-playing field among competitors. Consistency across all levels of government will ultimately reduce confusion and inefficiencies for consumers and businesses. Standardizing recycling practices and regulations across jurisdictions and sectors ensures consistency and efficiency in waste management efforts. Requirements for consistency regarding packaging composition following the Golden Design Rules of Packaging would help remove assumptions that are made at end-of-life and clarify messaging for the public on how to recycle items correctly.

- **Economic benefits for a strong circular economy:** The City's strong support for a circular economy approach promotes sustainable practices that reduce waste and maximize resource efficiency. By prioritizing economic benefits tied to sustainability, the City aims to create green jobs, stimulate local economies, and reduce environmental impacts associated with waste management.
- **Innovation and research:** Emphasizing innovation in product and packaging design to minimize waste and prioritize materials that are easily recyclable or reusable. This proactive approach not only reduces environmental impact from the source but also fosters continuous improvement in sustainable practices.

### 3. How would you prioritize these outcomes?

The City is responsible for residential garbage and recycling services, including collection and drop-off services at the Richmond Recycling Depot, public spaces recycling, litter collection services, and program development for sustainable waste management within Richmond. The City was also among the first cities to explore sweeping changes designed to reduce plastic waste under the *Single-Use Plastic and Other Items Bylaw No. 10000* (Bylaw 10000) and the adoption and implementation of the leading RCCS.

The City's top priority outcomes include:

- Prevention-first approach
- Consistency and confidence
- Economic benefits for a strong circular economy

### 4. Are there indicators or measures of success you would suggest are used to determine if an outcome is achieved or is achievable?

- **Track reuse and refill usage:** Monitoring the number of active reuse/refill businesses, as well as overall public adoption and usage of reusable and refillable options can indicate reduced waste generation and increased sustainability. This information would also be helpful for businesses that are looking for this type of service, but aren't sure which programs are operating around them.
- **Behaviour change:** Tracking changes in consumer behavior towards waste reduction practices, such as reducing single-use items, taking part in repair/refill initiatives, or opting for recyclable materials.
- **Track and trace supply chain:** Monitoring the flow of materials through the supply chain to ensure adherence to waste reduction strategies and sustainable sourcing practices. This can further assist municipalities as they move to conduct Material Flow Analyses to calculate overall circularity within their communities. The City and its consultants are currently conducting a Material Flow Analysis as a part of the RCCS.
- **Participation rates:** Measure the percentage of households and businesses participating in recycling and waste reduction programs. The City currently relies upon Metro Vancouver for waste composition data from the

commercial/institutional sector. Further, tracking commercial/institutional use of recycling facilities would provide further insight into material generation.

- **Customer survey:** Conducting surveys to gather feedback on perceptions of consistency in waste management services helps gauge public confidence and identifies areas for improvement.

**5. Should non-residential packaging targets be the same, or better than existing residential packaging targets? Why or why not?**

Non-residential packaging targets should have more ambitious targets than the residential sector, especially for reuse. Producers and businesses in the non-residential sector have far greater ability to influence design and can implement systems to support reuse than in residential collection schemes. Furthermore, material flow in business-to-business transactions is much more cyclic and regular, thereby allowing for integration of more reuse/refill options. However, it is important to recognize that small businesses often have fewer resources and may require more support and education to make significant changes. Conversely, larger and international businesses typically have greater capacity and influence, thus should lead by example with more ambitious targets.

It is essential to establish specific targets for non-residential packaging that go beyond traditional recycling. These could include specific goals for reuse, refill, and reduction of packaging materials. By focusing on these additional targets, businesses can innovate and explore more sustainable practices beyond basic recycling efforts.

**6. What types of targets would be most useful? Reduction targets; reuse targets; recycling targets; diversion targets?**

Targets are critical for motivating action and measuring progress. In closed-loop environments where materials stay onsite, such as restaurants, event venues, and schools, all reduction, reuse and recycling targets would be effective. In theory, these businesses would be able to control the sourcing and selecting of reusable/recyclable materials for the items they sell/provide on their site. This control and understanding the material composition of the items permitted for sale onsite, would allow the selection of appropriate bins for recycling and disposal. This would support streamlined monitoring of data, encourage proper waste sorting and material reuse. This may also reduce waste sent to landfills and minimize overall environmental impact.

For business-to-business transactions with extensive supplier networks and shipping operations, focusing on reduction and reuse targets would be beneficial. This approach involves providing guidance for procurement to emphasize waste reduction, avoidance, and operational efficiency. Implementing reduction targets requires establishing a system to trace and track the supply chain from procurement

through to logistics. This ensures waste reduction efforts are integrated across the operational process, enhancing efficiency and promoting sustainability. Reuse targets encourage businesses to identify opportunities to integrate reusable items, such as crates, pallets, and containers, into cyclic activities.

**7. Should there be regional or business specific targets in addition to provincial targets? Why or why not?**

Yes, there should be business-specific targets as they can effectively complement provincial targets by addressing the varying sectors and operational scales among businesses. For example, small businesses often face resource constraints and may require additional support and education to implement sustainable practices effectively. In contrast, larger and international businesses typically have greater resources and influence, which positions them to take on more significant responsibilities in leading provincial and industry-wide changes toward sustainability. There are also specific sectors which may be more easily activated to implement these types of changes based on their material composition. For example, those sectors that generate material similar to the materials found in existing residential EPR programs (i.e. schools, care homes, hospitality, etc.).

**8. How can we measure success or progress against established targets?**

Currently, there are data gaps in recycling and waste management that need support from the Ministry of Environment and Climate Change Strategy (the Ministry). For example, the detail at which existing EPR producers track materials is seemingly more granular than the level of detail at which they report. Commonly the level of detail reported publicly is within broad product categories such as paper and plastic, which makes it challenging for interested parties to understand the success of any programs, policies or educational efforts targeted at specific items. The Ministry is encouraged to work with local governments, non-profits and businesses to identify the data needs to understand reuse, refill, repair, remanufacturing and recycling data and make the necessary investments in tracking and reporting these activities.

**9. What actions are best suited at the local, regional, or provincial level of government?**

The provincial government should focus on establishing standards that follow the Golden Design Rules for Packaging to maximize recyclability, increase material and data transparency, establish appropriate EPR programs, and potentially ban hard-to-recycle materials. These policy levers would relieve local governments from having to implement programs/regulations to handle these items at end-of-life without proper EPR programs in place, further preventing a patchwork of policies from individual municipalities. Clear EPR programs will also assist local governments in educating residents and business on correct recycling practices. EPR programs should include the development and implementation of standardized communications strategies and materials to ensure consistent messaging and

awareness. Tools and communications materials should be filtered down to both regional and local governments for overall alignment.

Further requirements such as mandating solid-waste reduction/diversion plans should be enforced provincially to ensure an equal playing-field for all businesses across the province. Local governments can support this by integrating the requirements into their business licensing bylaws and review processes. The City launched the *Richmond Business Recycling Resources Program* (BRRP) pilot in May 2024, which is designed to provide Richmond businesses with free support, tools and information to enhance recycling efforts and reduce waste going to the landfill. Some of the helpful tools distributed through the BRRP pilot include a “Recycling & Waste Reduction Plan” template, “Waste Audit Tool”, “Waste Composition Calculator”, and “Waste Diversion Calculator.”

**10. What factors should be taken into consideration if the Province enables or promotes local actions?**

- **Consistency:** Ensuring a level playing-field for businesses is critical for overall program success. If authority is delegated to local governments, it is important to ensure that actions and overall messaging are consistent.
- **Capacity and costs:** Supporting changes at provincial and regional levels often results in increased operational costs for local governments. Offering easy to implement programs can alleviate the financial burden on local governments by reducing the effort and resources required to develop and implement complementing programs. Additionally, cost impacts to commercial businesses to implement chosen programs/regulations should be considered as businesses of differing sizes may be less equipped to adopt such changes.

**11. What is already working to prevent packaging waste – for businesses, institutions, haulers, local governments?**

The City has been proactive in addressing packaging waste through initiatives such as the Bylaw 10000, which aims to comprehensively reduce plastic waste and the RCCS, targeting 100% circularity by 2050. More recently, the City launched the BRRP pilot in May 2024, aimed at educating and advising businesses on enhancing recycling and waste reduction practices. These efforts are pivotal in preparing businesses for a shift towards a more sustainable and circular economy. The key consideration for the success of these programs has been through communication and education campaigns for the community and businesses alike.

**12. Are there other actions that should be considered? What are they?**

Other actions that should be considered as a part of addressing ICI waste are:

- Implementing a comprehensive provincial education and communications campaign to ensure general awareness.

- Addressing current data gaps in ICI waste materials by improving data collection and analysis. This will provide valuable insights for more effective waste management practices.
- Proactively engaging private haulers in these initiatives, as they play a pivotal role in ICI waste collection. Clear communication and compliance guidelines will help ensure that haulers understand and adhere to any regulatory changes, fostering smoother implementation.
- Ensure market capacity to handle the influx of materials into the market while fostering local processing and facilities.

As noted in the *Canada-Wide Action Plan for EPR* from the Canadian Council of Ministers of the Environment, EPR is not meant to be a stand-alone solution, but rather part of a suite of policies that drive design and production in the right direction. Utilization of the multiple policy levers identified in this Discussion Paper may help internalize many of the costs that are currently externalized, and shifted to local governments today.

### 13. What are the benefits or limitations of these waste prevention options?

- **Difficulty separating ICI and residential waste:** Significant challenges arise in mixed-use buildings where businesses and residential units share waste and recycling spaces. Additionally, private haulers often collect both residential and non-residential waste on the same route, complicating established waste management practices. EPR programs for this sector will need careful consideration to ensure implementation does not unintentionally impact pre-existing programs.
- **Products or materials from overseas:** Eliminating hard-to-recycle materials is important to reduce contamination and reduce consumer confusion. However, integrating materials sourced from overseas into the list of designated recycled materials should be considered and may pose logistical and regulatory hurdles. Varying global recycling standards and international regulations can complicate efforts to include these materials in local recycling programs seamlessly. The City encourages the Province to follow the Golden Design Rules for Packaging. It will be imperative to consult with industry to determine appropriate material choices.
- **Behavioral change:** Successful implementation of waste prevention options relies heavily on changing consumer and business behaviors. Finding a balance between regulatory enforcement and encouraging sustainable choices through incentives and educational campaigns will be crucial, particularly during the initial phases of implementing new waste management strategies. Promoting awareness and fostering understanding among stakeholders can facilitate the adoption of sustainable practices and enhance community engagement.

#### **14. How ready are organizations, businesses, governments to implement?**

Based on the City's experience with Bylaw 10000, and the newly established BRRP pilot, businesses have generally shown support and understanding of the need to take part in these initiatives. The launch of the BRRP pilot in May 2024 highlights the City's work to educate commercial businesses about waste regulations, their specific servicing needs and proper recycling practices. Initial discussions have revealed that businesses typically lack direct control over waste hauling contracts. Instead, these decisions are often made by property managers or building owners who arrange services for entire business parks, each with diverse waste and recycling requirements. Engaging and educating property managers/building owners will be important in advance of the proposed policy levers.

Further, through the City's outreach, it has been observed that businesses vary in their readiness levels to adapt and adopt new waste reduction initiatives. Some large businesses are already proactive in waste reduction and recycling, setting commendable examples. However, other larger businesses and well-known chain organizations currently only meeting minimum requirements or less. This highlights the importance of implementing requirements and enforcing targets to motivate businesses, especially those capable of implementing more sustainable practices.

#### **15. How should implementation be prioritized?**

- Waste prevention plan requirement: start voluntarily, mandate by 2030
- Reuse requirements: start voluntarily, mandate by 2030
- EPR expansion: Immediate prioritization for planning and consultation to achieve harmonization across regions and province.

#### **16. What are the benefits or limitations of expanded EPR options?**

EPR programs have proven effective in residential recycling and collection systems and holds promise for the ICI sectors where material streams overlap. The expansion can align with sectors that already share similar material compositions to the residential EPR programs, such as schools, hospitality, and care homes. However, there are important limitations to consider. Increasing the volume of materials managed under EPR programs may strain local processing capacities, necessitating upgrades to recycling facilities and logistical systems. Due to the reduction of industrial land available in urban centres, these areas may face challenges in siting new facilities or expanding existing ones to accommodate the expansion of EPR programs. Furthermore, remote communities may lack overall access to EPR programs, posing challenges in achieving equitable expansion.

**17. How ready are organizations, businesses, and governments to implement an expanded form of EPR?**

The City has been proactive in addressing packaging waste through initiatives such as the Bylaw 10000, which aims to reduce plastic waste comprehensively, and the RCCS, which targets achieving 100% circularity by 2050. In May 2024, the City launched the BRRP pilot to educate and advise businesses on enhancing recycling and waste reduction practices. Feedback from the BRRP pilot outreach indicates that businesses are willing to increase recycling efforts, especially for materials like flexible plastics and Styrofoam, provided that collection is convenient and costs are reasonable.

These programs are pivotal in preparing businesses for a transition to a more sustainable and circular economy. The City supports and welcomes the integration of expanded EPR programs, reinforcing the commitment to sustainable waste management practices.

**18. Are there sectors or materials that should be prioritized to be included or excluded?**

Priority should be given to sectors that produce materials similar to those managed in residential EPR programs, such as schools, hospitality and care homes. Additionally, specific sectors like agriculture and warehouse/shipping could also benefit from prioritized implementation of EPR programs due to their cyclic/regular business-to-business transactions and distinct waste streams.

While no sectors should be excluded, those facing greater implementation challenges should be phased in later. This approach tackles sectors wherein the materials and processing needs are relatively known, ensuring a smoother initial implementation. It also allows additional time to address more complex or unfamiliar materials appropriately.

**19. How should implementation of EPR actions be prioritized (e.g. by sector, by material, by geographic location)?**

Priority should be given to sectors that primarily operate on a business-to-consumer level, assuming the materials produced align closely with those managed in residential EPR programs. These sectors are likely to benefit from existing processing facilities already in place.





July 18, 2024

Honourable George Heyman Minister of Environment and Climate Change Strategy  
Ferguson Block  
PO Box 9047 Stn Prov Gov  
Victoria, BC V8W 9E2

By Email: [Circularcommunities@gov.bc.ca](mailto:Circularcommunities@gov.bc.ca)

**Re: CKF Incorporated Response - Preventing Waste in British Columbia: Non-Residential Packaging & Paper Products Discussion Paper**

Dear Minister Heyman,

CKF Inc. welcomes the opportunity to respond to the **Preventing Waste in British Columbia: Non-Residential Packaging & Paper Products Discussion Paper**.

**About CKF Incorporated:**

CKF, a subsidiary company of Scotia Investments Limited, has been in business within Canada for 91 years. We are a Canadian, family-owned, manufacturer offering a wide range of molded pulp fiber, expanded polystyrene (EPS) foam and polyethylene terephthalate (PET) foodservice and packaging products to service retail consumers, foodservice operators, and the general packaging industry. CKF is Canada's largest manufacturer of single-use plates, marketed under the [Royal Chinet](#) brand name. CKF is a leader in a variety of other fiber, EPS foam, and PET plastic products, including egg cartons, meat trays, produce packs, food trays, carry-out trays, and containers.

CKF has two molded-fiber plants: one in Hantsport, NS and one in Langley, BC. It has two EPS foam plants: one in Rexdale, ON and one in Langley, BC. We also manufacture PET foodservice trays in British Columbia and Ontario.

CKF produces approximately 2.5 billion units annually and employs approximately 700 workers nationwide. Additional information about CKF can be found at [www.ckfinc.com](http://www.ckfinc.com)

**CKF and the Plastics Industry Role in the Circular Economy for Plastics.**

CKF is committed to advancing viable solutions to address plastic waste and manufacturing sustainable packaging. We have made the following commitments:

- 100% of CKF produced packaging products compostable, recyclable or recoverable by 2030.
- 100% of all plastics packaging being reused, recycled, or recovered by 2040.
- CKF is a member of Operation Clean Sweep®, an international plastic stewardship program aimed at eliminating the escape of plastic pellets from industry operations, with a focus on preventing leakage into rivers and oceans

CKF recognizes the valuable role that plastics play in our modern and sustainable way of life: food packaging helps ensure consumers have access to safe, sanitary food products, and play a significant role in extending product shelf-life and reducing food waste and greenhouse gas (GHG) emissions. Plastics are critical to achieving climate change goals – from lighter, stronger wind turbines, lighter, more fuel-efficient vehicles, to insulating materials to keep our homes warm.

Learn more at CKF Sustainability: <https://ckfinc.com/sustainability/>

## Comments

CKF Inc. is supportive of BC's plans to divert more plastics and paper packaging materials for recycling in the Circular Economy. We are a registered producer that funds the Recycle BC extended producer responsibility program that is responsible for the collection of residential packaging and paper product recycling throughout BC. The Recycle BC program has increased the diversion of packaging and paper. This conserves resources, reduces landfill needs, provides recycled materials for manufacture into new products, protects the environment and supports local economies.

We commend BC's efforts to increase diversion of waste resources by examining Non-Residential Packaging and Paper Products, attempting to build on the success of BC's highly successful and first ever, 100% producer Extended Producer Responsibility (EPR) program in North America.

CKF has comments on extending EPR to the non-residential sector, well-known in the waste industry as the Industrial, Commercial & Institutional (IC&I) sector. We believe there are options other than EPR, to improving diversion performance in the IC&I sector, that will not disrupt long established services and markets in this sector, which is more diverse and different from the residential sector.

### **Industrial, Commercial & Institutional (IC&I) Defined versus Residential Sector**

The IC&I sector is very different from the Residential sector which is focused on single family and multi-residential households by BC's current EPR program serviced by Recycle BC.

The IC&I sectors' broad diversity is represented by the following facilities found in the discussion paper (page 12):

- Industrial: heavy & light manufacturing, agricultural and processing facilities
- Commercial: retail, grocery and mall stores; offices, restaurants, sport facilities and many more commercial types of locations
- Institutional: universities, schools, hospitals, government facilities, transportation facilities such as airport and bus terminals to name a few.

IC&I facilities present very different and diverse streams of packaging and paper product materials to be collected and managed versus the more consistent residential recycling material flows the BC EPR program currently addresses.

The diversity of business relationships which include business to business and business to consumers also complicates the application of EPR to the IC&I sector due to diverse material flows and material quality affecting end markets who accept these materials for manufacturing new products or for additional processing.

For these reasons and recognizing the diverseness of IC&I facilities, the government and proponents of EPR for the IC&I sector cannot assume the approach taken for residential single-family and multi-residential households will work the same for IC&I sectors.

### **IC&I Managing Its Own Waste Streams**

Currently the IC&I sector has the responsibility to manage its own waste, recyclables, reusables and composting streams by contracting waste system service providers or through their own internal waste management systems. It is also recognized there are IC&I facilities for various reasons, do not implement waste and recycling systems. These challenges vary from management choice, cost, facility challenges (e.g. floor space to internal infrastructure) to the quality of materials diverted not meeting end-market specifications.

The IC&I sector is the responsible generator of its waste streams. Contracts, business relationships and markets that have developed with service providers, should not be disrupted, as this can have a number of consequences that may impair overall diversion.

Those consequences of imposing EPR systems on the IC&I sector and producers include:

- Increased costs to businesses due to the development of monopolies that result in a less competitive marketplace for waste and recycling services. Cost will also be increased due to the new regulatory burdens that would be imposed on the IC&I sector and supply chain including obligated producers.
- Disruption to end markets through a changing marketplace that EPR programs cannot manage or deal with efficiently.

- Unforeseen consequences on the IC&I sector and supply chains that results in less, not more diversion due to additional regulatory burdens.

### **Catch All Government Policies On IC&I Sector and Obligated Producers**

A major concern that must be addressed, is the diversity of this sector where a new EPR IC&I program is proposed. Due to the broad diversity of the IC&I sector, each sectors varying needs and by each facility, EPR programs would find it difficult to be responsive to targets and regulated outcomes that do not recognize specific facility, sector needs and even end market availability.

The current approach of IC&I responsibility for generating and managing its own waste and contracting waste management services, allows IC&I and service provider management approaches to address local and broader market forces, that EPR programs have difficulty addressing, such as market availability and instability.

As mentioned previously and recognized in the report, some IC&I generators of waste and recyclables are challenged in diverting and managing their waste streams. We believe for large and small generators there are policy alternatives that would support BC's goal of diverting more waste resources that are more practical, efficient and less costly to the IC&I sector than a regulated EPR regime.

### **Policy and Other Options Available to Support IC&I Diversion**

We encourage the government to examine options other than EPR regimes to encourage and incentivize large and small IC&I waste resource generators to divert more waste from landfill to support the Circular Economy.

**Recommendation #1:** For small IC&I generators, allow subscription services that would allow these generators to leverage the current Recycle BC EPR program for the designated list of recycles that have markets. This means small IC&I generators having access to recycling depots and curbside pickup dependent on logistics and availability of services. This approach could assist in making diversion affordable for IC&I generators to participate in waste diversion programs. This may also benefit current recycling and waste diversion programs with added economies of scale for materials collected.

**Recommendation #2:** Policies on designated materials to be collected require consultations with the IC&I sector, service providers and end markets to ensure what is collected has a market to meet expected outcomes that are realistic and attainable. The IC&I sector service providers have expertise and the resources to improve diversion in partnership with their IC&I clients.

**Recommendation #3:** The IC&I sector is market driven with existing contracts and supply chains. A new IC&I EPR system would disrupt current diversion systems resulting in other unintended consequences (e.g. less diversion, increased costs) that should be avoided. The government should examine policies that support and compliment current IC&I systems that will assist it to grow, divert more material and an expanded list of materials. This requires consultation with the key stakeholders in the IC&I sectors responsible for collection, processing and marketing.

**Recommendation #4:** Targets should be IC&I sector specific if implemented. This requires consultation within the IC&I sectors, which have unique circumstances, opportunities and challenges. Targets should be flexible and start out with "best effort" with review every 2 years to assess progress.

**Recommendation #5:** Table #3 Policy approaches to address non-residential packaging and paper - IC&I (p. 21) be examined as alternative approaches to implementing a new IC&I EPR system that will drive costs up and with additional regulatory burdens on IC&I, producer/brand owners and service providers. This requires additional consultation with key stakeholders to ensure these policy alternatives are appropriate and will meet expected outcomes and avoid regulatory burdens.

### **Summary and Conclusion**

We have provided our observations and recommendations to the government to improve its plans to create a circular economy for packaging and paper products that benefits the IC&I sector, supply chains, service providers and meet BC's goal of reducing waste to landfill in support of the Circular Economy.

In conclusion, we support the goal of waste reduction with the industry's input into an Economy. regulatory framework built on cooperation and collaboration resulting in positive benefits for the province and society.

We look forward to participating in the ongoing discussions and having these recommendations considered by the government.

Sincerely,



**Rick Everest**

*Director, Sustainability*

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**Better Planet | Better Business | Better Community**



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## Selected Discussion Paper Questions – Answers

### 1. Are there any desired outcomes missing from this list?

- Environmental outcomes should be included to address GHG emissions, life cycle assessment to quantify the benefits and track the progress of programs in protecting the environment

### 2. What outcomes are most relevant to your business, organization, or community?

- Economic benefits for a strong Circular Economy are critical as success leads to greater support for sustainable waste material recovery keeping products and packaging out of the environment and in the economy. Protecting the environment while improving the economy improves organizations reputation.

### 4. Are there indicators or measures of success you would suggest are used to determine if an outcome is achieved or is achievable?

- Environmental improvement through indicators such as GHG reduction, waste diversion from landfill of packaging and paper products by material, recycling rates,

### 5. Should non-residential packaging targets be the same, or better than existing residential packaging targets? Why or why not?

- No, they should not be the same as residential
- If targets are established, they will have to reflect the unique and diverse business and sectors encompassed by the IC&I definition
- We have recommended a “best-efforts” approach to targets established in consultation with the various sectors with review every two years to assess progress.

### 16. What are the benefits and limitations of an expanded EPR option.

- Limitations applying EPR to the existing IC&I sector system, have been mentioned throughout our response and include:
  - Disruption of an existing IC&I system that can introduce unintended impacts that reduce competition and increase costs to the IC&I sector due to the creation of monopolies
  - A new IC&I EPR system would not be as responsive as current waste system service providers, who are market driven and competitive to the diverse and unique makeup of the IC&I sectors
  - A new IC&I EPR system could disrupt established supply chains to mills and processors for packaging and paper products leading to less diversion and economic harm to local recycling operations.

### 18. Are there sectors or materials that should be prioritized to be included or excluded

- Recognizing the IC&I sector is diverse in the composition of facilities and material flows, this question should in principle take an approach that recognizes this fact and then prioritizes materials or included and or excluded based on consultation with the key stakeholders.



**DART CONTAINER CORPORATION**

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July 23, 2024

Honorable George Heyman  
Minister of Environment & Climate Change Strategy  
Ferguson Block  
PO Box 9047 Stn Prov Gov  
Victoria, BC V8W 9E2

By Email: [Circularcommunities@gov.bc.ca](mailto:Circularcommunities@gov.bc.ca)

**Re: Dart Response - Preventing Waste in British Columbia: Non-Residential Packaging & Paper Products Discussion Paper**

Dear Minister Heyman:

Dart Container Corporation (Dart) welcomes the opportunity to respond to the **Preventing Waste in British Columbia: Non-Residential Packaging & Paper Products Discussion Paper**.

### **About Dart**

Dart is a leading manufacturer of sanitary, individual-use foodservice containers. We manufacture foodservice ware containers from paper, mold fiber, recycled content, bio-resin, as well as from several plastic resins - polyethylene terephthalate (PET), polypropylene (PP), polystyrene (PS) and expanded polystyrene (EPS). Headquartered in Michigan, Dart operates in three countries. This includes a manufacturing facility and a distribution center in Ontario, Canada, as well as a salesforce located throughout the country.

### **Dart's Leadership in Sustainability**

We give people the freedom to enjoy their food & drinks anywhere - and we accept our responsibility for the environmental effects of that freedom. We take leadership and action on initiatives that reduce or eliminate the impact our products and practices have on our neighborhoods, our towns, and our planet.

And we're not stopping there. We intend to lead and push others in our industry to do more because it's the right thing to do. Our work includes the following focus areas:

**Dart Innovates** - We're minimizing our company's environmental impact by innovating new or improved processes, programs, and products with thoughtful design for sustainability.

- The Vertical, Dart's new \$32 million technical and innovation center, enables us to develop new and improved products with a focus on sustainability and improved speed to market.

**Dart Inspires** - We're inspiring our customers, employees, and industry to be part of the solution and join us in driving measurable environmental change.

- Dart has committed that each of our locations will participate in clean-up events in the communities where we live and work and commit to planting a tree for every hour of service.

**Dart Invests** - We're investing in real solutions for environmental issues at home, on the go and around the world.

- Dart plays an active role in industry associations to advance sustainable solutions for the products we manufacture.

Learn more at: [www.dartcontainer.com/sustainability](http://www.dartcontainer.com/sustainability)

## Comments

Dart is supportive of BC's plans to divert more plastics and paper packaging materials for recycling in the Circular Economy. We are a producer that participates in various extended producer responsibility (EPR) programs that are responsible for the collection of residential packaging and paper product recycling including BC. These programs have increased the diversion of packaging and paper, conserve resources, reduce landfill needs, provide recycled materials for manufacture into new products, protect the environment and support local economies.

We commend BC's efforts to increase diversion of waste resources by examining Non-Residential Packaging and Paper Products, attempting to build on the success of BC's first ever 100% producer Extended Producer Responsibility (EPR) program in North America.

Dart believes there are options other than EPR, to improve diversion performance and not disrupt long established services and markets in the IC&I sector, which is more diverse than the residential sector.

## Industrial, Commercial & Institutional (IC&I) Defined versus Residential Sector

The IC&I sector is very different from the Residential sector which is focused on single family and multi-residential households under BC's current EPR program serviced by Recycle BC.

The IC&I sector's broad diversity is represented by the following facilities found in the discussion paper (page 12):

- Industrial: heavy & light manufacturing, agricultural and processing facilities
- Commercial: retail, grocery, and mall stores; offices, restaurants, sport facilities and many more commercial types of locations

- Institutional: universities, schools, hospitals, government facilities, transportation facilities such as airport and bus terminals to name a few.

IC&I facilities present diverse streams of packaging and paper product materials to be collected and managed versus the more consistent residential recycling material flows the BC EPR program currently addresses.

The range of business relationships which include business-to-business and business-to-consumers also complicates the application of EPR to the IC&I sector due to diverse material flows and material quality affecting end markets who accept these materials for manufacturing new products or for additional processing.

For these reasons, the government, and proponents of EPR for the IC&I sector cannot assume the approach taken for residential single-family and multi-residential households will work the same for IC&I sector.

### **IC&I Managing Its Own Waste Streams**

Currently the IC&I sector has the responsibility to manage its own waste, recyclables, reusables, and composting streams by contracting waste system service providers or through their own internal waste management systems. It is also recognized there are IC&I facilities for various reasons that do not implement waste and recycling systems. These challenges vary from management choice, cost, facility challenges (e.g., floor space to internal infrastructure) to the quality of materials diverted not meeting end-market specifications.

The IC&I sector is the responsible generator of its waste streams. The contracts, business relationships and markets that have developed with service providers, should not be disrupted, as this can have a number of consequences that may impair overall diversion.

Consequences of imposing EPR systems on the IC&I sector and producers include:

- Disruption to end markets through a changing marketplace that EPR programs cannot manage or deal with efficiently.
- Unforeseen consequences on the IC&I sector and supply chains that results in less, not more diversion due to additional regulatory burdens.

### **Catch All Government Policies On IC&I Sector and Obligated Producers**

A major concern that must be addressed, is the diversity of this sector where a new EPR IC&I program is proposed. Due to the broad diversity of the IC&I sector, each sectors varying needs and by each facility, EPR programs would find it difficult to be responsive to targets and regulated outcomes that do not recognize specific facility, sector needs and even end market availability.

The current approach of IC&I responsibility for generating and managing its own waste and contracting waste management services, allows IC&I and service provider



management approaches to address local and broader market forces, that EPR programs have difficulty addressing, such as market availability and instability.

As mentioned previously and recognized in the report, some IC&I generators of waste and recyclables are challenged in diverting and managing their waste streams. We believe for large and small generators there are policy alternatives that would support BC's goal of diverting more waste resources that are more practical, efficient, and less costly to the IC&I sector than a regulated EPR regime.

### **Policy and Other Options Available to Support IC&I Diversion**

We ask the government to examine options other than EPR regimes to encourage large and small IC&I waste resource generators to divert more waste from landfill to support the Circular Economy.

### **Summary and Conclusion**

In conclusion, we support the goal of waste reduction that thoughtfully considers industry's input and results in positive benefits for the province and society.

We look forward to participating in the ongoing discussions.

Sincerely,



AnnMarie Treglia  
Global Director, Government Affairs

## Selected Discussion Paper Questions – Answers

### 2. What outcomes are most relevant to your business, organization, or community?

- Economic benefits for a strong Circular Economy are critical as success leads to greater support for sustainable waste material recovery keeping products and packaging out of the environment and in the economy. Protecting the environment while improving the economy.

### 5. Should non-residential packaging targets be the same, or better than existing residential packaging targets? Why or why not?

- No, they should not be the same as residential.
- If targets are established, they will have to reflect the unique and diverse business and sectors encompassed by the IC&I definition.

### 16. What are the benefits and limitations of an expanded EPR option.

- Limitations applying EPR to the existing IC&I sector system, have been mentioned throughout our response.

### 18. Are there sectors or materials that should be prioritized to be included or excluded

- Recognizing the IC&I sector is diverse in the composition of facilities and material flows, this question should in principle take an approach that recognizes this fact and then prioritizes materials to be included and or excluded based on consultation with the key stakeholders.

July 23, 2024

**Re: Consultation Response – Preventing Waste in BC: Non-Residential Packaging and Paper Products.**

Thank you for the opportunity to provide feedback on the proposed measures to prevent waste in non-residential packaging and paper products in British Columbia. The RDN commends the province for taking steps towards addressing environmental challenges through comprehensive policy approaches.

The policy summary outlines significant waste challenges in B.C., with a substantial portion of municipal solid waste comprising of recyclable materials like packaging. The proposed outcomes, guided by principles of environmental cleanliness, a circular economy, and reconciliation with Indigenous Peoples, are commendable. It's crucial to ensure that all residents, including Indigenous and remote communities, have equitable access to effective waste management solutions and recycling options. Equitable being determined by residents, local governments, and the province, not EPR programs.

**Policy Approaches:**

1. **Extended Producer Responsibility (EPR):** Expansion of EPR to cover packaging and paper products from various sources, including businesses and institutions, is a positive step. However, to ensure effectiveness, we feel that EPR stewardship for specific sectors to be the better option. In order to make it financially viable, there needs to be enough volume. This means that we would need everyone participating in the program which may be difficult for remote communities.

**Suggestions:**

- Consider incentives or subsidies for smaller businesses/rural communities to participate in EPR programs.
  - This policy considers only end of life. We need to go to the source and encourage producers to use better packaging for products.
  - Implement clear guidelines for the eco-design of products to enhance recyclability and reclamation outcomes.
- 
2. **List of Designated Materials:** The proposal to create a list of designated recyclable materials holds potential for enhancing recycling accessibility in urban areas, yet it overlooks the challenges faced by rural communities and First Nations lacking resources and infrastructure for recycling. Without incentives or enforcement measures, there is concern that low participation could lead to disposal fees or local governments needing to offset the cost of collection.

Moreover, the focus solely on end-of-life product management fails to address the underlying issues.

**Suggestions:**

- Include products/materials from overseas in the list.
  - Import tax for materials coming in from overseas that aren't a part of the list.
  - Consider other programs operating or planned in other provinces to promote standardization and economies of scale in material management.
  - Standardize inputs and minimize different materials coming into the system to help simplify.
  - Direct engagement with communities to understand supply chain dynamics and optimize the designated list.
  - Address the root problem through incentives, subsidies, and support for locally manufactured low- or no-packaging solutions.
  - Standardize inputs and minimize different materials coming into the system.
  - Ensuring user-friendly processes to alleviate burdens on local governments.
  - Include clear direction on which facilities businesses/users can bring recyclable materials.
3. **Disposal Bans:** Setting provincial targets for non-residential packaging and implementing disposal bans for designated materials across B.C. are crucial for promoting waste reduction and maximizing material recovery. However, careful consideration must be given to the impact on small businesses and the need for adequate recycling infrastructure before bans are enforced. Imposing fines for contamination will impact small businesses far more than large corporations. The latter will simply consider contamination fines as a “cost of doing business”. Furthermore, all responsibility falls onto waste haulers to ensure that they don't have banned items in their load. It doesn't address or penalize the individual who contaminated the load.

**Suggestions:**

- First step: create markets for recycling by increasing prices for disposal to encourage diverting waste from the landfill.
- Banned items might be hidden in black garbage bags. Consider banning the use of black/opaque garbage bags. This will also avoid creating more work/danger for landfill employees and waste haulers.
- Offer rebates, subsidies, or grants for waste haulers to upgrade technology for identifying contamination, as well as to hire staff for waste inspections.
- Require all ICI sectors to monitor their waste disposal bins in case of contamination and to offer that data to waste haulers, to identify which business it originated from (assuming waste haulers are collecting from multiple businesses per truck).
- Province to hire staff to work directly with local governments to help determine which items to ban, help identify potential markets and services available to see if bans are

feasible.

4. **Reuse Requirements and Standardized Actions:** Requiring specific sectors to adopt reuse practices and standardizing waste prevention plans and audits are essential for fostering a prevention-first approach and ensuring consistency in waste management practices. However, these requirements may pose financial burdens on small/new businesses and require substantial support and guidance from the provincial government. Moreover, these policies assume universal knowledge and concern for waste reduction, which may not align with reality. Implementing and enforcing these policies will demand considerable time and effort from regulatory bodies, with no clear delineation of responsibility. As these policies gain traction among businesses, local governments may increasingly shoulder the burden of enforcement.

**Suggestions:**

- Require large corporations/chains, who have the finances to implement these requirements, to lead the way.
  - Offer incentives or grants to small businesses to help cover the costs associated with implementing requirements.
  - Implement foodware share program where you can get a reusable to-go item but are able to dispose of it at any participating location and/or drop bins. This will require subsidies from the province for businesses.
  - Deploy Provincial Waste Specialists to assist businesses in developing and implementing waste prevention plans.
5. **Provincial Data Standardization:** Developing standardized categories for waste audits and promoting data sharing among local governments and businesses will enhance consistency, transparency, and accountability in waste management efforts. However, provisions should be made to accommodate smaller regions with limited waste generation. Conducting waste audits is expensive and time consuming. Smaller regions who don't generate a significant amount of a certain waste might not want to pay to audit that category.

**Suggestions:**

- Establish minimum expectations for audit categories to ensure comprehensive waste characterization studies.
- Facilitate peer learning among local governments and businesses to improve waste management practices.

**Discussion Questions:**

1. Are there any desired outcomes missing from this list?
  - As mentioned previously, no responsibility is placed on manufacturers, who have the ability to reduce packaging and stop it from entering the system in the first place.

2. What outcomes are most relevant to your business, organization, or community?
  - The desired outcome most relevant to the RDN is access. We have a number of small communities expanding over a large section of Vancouver Island that do not have enough recycling options. There are limited to no recycling options for certain items, or residents have to long distances to properly dispose of items. The province needs to mandate recycling depots/centers be located in each complete community – if you can grocery shop, see a doctor, and go to school in your community, you should be able to recycle your waste there as well.
  
3. How would you prioritize these outcomes?
  - From a local government perspective, the desired outcomes ranked from highest importance to lowest are as follows. Access, Maximize Material Recovery, Prevention-First Approach, Accountability and Transparency, Economic Benefits for a Strong Circular Economy, Consistency and Confidence.
  
4. Are there indicators or measures of success you would suggest are used to determine if an outcome is achieved or is achievable?
  - Conducting audits of the quantity and type of materials being landfilled.
  - Tracking the number of ICI locations that have multiple waste streams, and their contamination rates.
  - Decrease in sourcing new materials.
  
5. Should non-residential packaging targets be the same, or better than existing residential packaging target? Why or why not?
  - They should be the same. We are in the early stages of implementing targets and there will be a lot of learning. Creating unrealistic targets could discourage people from participating.
  
6. What types of targets would be most useful? Reduction targets; reuse targets; recycling targets; diversion targets?
  - They are all useful targets, and having a variety will help ICI reach their target goals. One target may better suit one business vs another.
  
7. Should there be regional or business specific targets in addition to provincial targets? Why or why not?
  - Yes. Again, access to recycling centers varies greatly depending on where you are. Similarly, the types of materials being produced varies as well. This should not be treated as a “one size fits all”.
  
8. How can we measure success or progress against established targets?
  - Waste audits.
  - Self reporting and the option to audit the self reporting data.
  - Similar to how success and progress is measured with EPR programs.
  
9. What actions are best suited at the local, regional, or provincial level of government?

- Provincial government to spearhead actions. Placing any responsibility on local governments will lead to over-exhausting systems and non-cohesive actions. This should come from the top-down, consulting each municipality at every step. Allowing municipalities to make their own decisions as well based on their needs/limitations, but ultimately should be guided by the province.
10. What factors should be taken into consideration if the Province enables or promotes local actions?
- The province needs to take into account the capacity of local governments. They need to consider that not everyone will make this a priority or have the capacity to and for this reason, we cannot foresee how this program could be successful if the Province enables local actions.
11. What is already working to prevent packaging waste – for business, institutions, haulers, local governments?
- Existing EPR programs for residential packaging, although, there is room for improvement and there should be more focus on requiring EPR programs to provide better services and not require local governments to off-set collection costs.
  - 3 stream waste diversion for Single Family Homes.
  - Disposal bans to encourage recycling.
12. Are there other actions that should be considered? What are they?
- Banning the use of black garbage bags to conceal banned items.
  - Require manufacturer and produces of products to have long terms plan – with tangible, measure able goals, to reduce packaging for their products.
  - Offer incentives to businesses that reduce their packaging use. Financial incentives based on weight and/or number of items that have been discounted or donated. While this point focuses on reducing waste of the *product*, that product still required to be packaged and shipped. Addressing products that go to waste inadvertently addresses packaging waste.
  - Ban the use of “Best Before” dates in food retail stores to avoid unnecessary organic and packaging waste. The misunderstanding of best before dates contributes to excess food waste, and in turn, excess packaging waste.
  - Mandate EPR to include “How To Recycle Me” QR codes on all packaging to make it easier for consumers to properly sort their waste. A tailored QR code that leads to an online interactive map that will show you all the places you can recycle that item.
  - Avoid relying on “innovative technologies” such as “compostable, biodegradable, or bio-based” plastics for a couple reasons:
    - i. Most municipalities lack the technology/infrastructure to handle these items, and so they end up doing more damage contaminating waste streams. This also creates confusion for consumers as they believe they are doing the right thing by purchasing these products. When they find out they are wasting money and contaminating waste streams, it leads to a lot of frustration.
    - ii. Long-term studies on these “innovative plastics” have not been done, and therefore, we don’t know the long-term effects of putting them in our compost. Potential for microplastics to be entering into our organics stream and the environment. For example: BPA-free products. Plastic manufacturers have

switched from BPA to BOS and BOF alternatives, which studies now conclude are no less harmful than the former. We would be better off investing efforts in consumer behaviour changes rather than trying to continue on this waste-centric lifestyle with mediocre alternatives.

- Tax imported goods that don't meet the criteria.

13. What are the benefits or limitations of these waste prevention options?

- The limitations are that they assume everyone is willing to participate and will be cooperative.
- They also don't specify who will be in charge of monitoring and enforcing waste prevention options. These actions will require a lot of support and education, none of which was considered in the discussion paper.
- The benefits are that this will increase awareness on waste reduction, increase waste diversion options and reduce waste going to the landfill.

14. How ready are organizations, businesses, governments to implement?

- There is no "one size fits all". Some are more prepared and are more eager to participate than others. It will require a slow implementation with lots of help and leeway given to individuals.
- Larger companies and organizations may have access to greater resources to meet requirements.

15. How should implementation be prioritized?

- Governments should be the first to implement actions. It will be difficult to enforce if governments aren't doing it themselves. Second should be large businesses and organizations who are key contributors to the take-make-waste linear approach. They have the finances and resources to implement actions. Lastly should be small businesses, as they're contribution to packaging waste is smaller and if their upstream providers have already made required changes, then those changes will flow down to the smaller businesses.
- With any implementation model, there needs to be robust enforcement – something more than a small fine that is seen as the cost of doing business.

16. What are the benefits or limitations of expanded EPR options?

- The benefits include systems change if producers are now responsible for the waste their products produce. Organizations will be more eager to create products with less waste to reduce costs in the long run. Recycling, as a business has seen considerable growth over the years because of policy changes. Without these, there would be not recycling industry. An expansion of EPR directly results in an increase in well paying, "green" jobs.
- Limitations include access to infrastructure and facilities in remote communities.

17. How ready are organizations, businesses, and local governments to implement an expanded form of EPR?

- All organizations are at a different place in regards to implementation. Start with the top and work down.

18. Are there sectors or materials that should prioritized to be included or excluded?

- None should be excluded.



- Prioritize sectors or materials that are the largest source – consider by volume and weight.
19. How should implementation of EPR actions be prioritized (e.g. by sector, material, or geographic location)?
- EPR actions should be prioritized by material.

Overall, the RDN supports the goal of reducing waste and promoting a circular economy in B.C.. However, the current proposed policies do not do enough in addressing the specific challenges faced by small businesses and rural communities. Moreover, there appears to be insufficient clarity regarding the enforcement responsibilities associated with each policy. There needs to be an assurance that the enforcement is robust and that the duties do not disproportionately burden local governments, straining their already limited resources. It is essential that any regulatory framework be crafted with clear focus on producers and manufacturers with a focus on first reducing packaging waste and ensuring recyclability.

Sincerely,



Ben Routledge  
Manager of Solid Waste Services  
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# Preventing Waste in British Columbia: Non-Residential Packaging & Paper Products

## Cowichan Valley Regional District's Response to the Discussion Paper

July 23, 2024

### **General Questions:**

#### **1. Issues or concerns you think we should be aware of:**

##### *Lack of Options for Mid to Small ICI Organizations*

As you likely already know, larger businesses and institutions can more easily justify allocating resources to contract a private service provider to manage (collect and deliver) their ICI PPP. However, smaller organizations within the ICI sector struggle to find the resources to coordinate similar solutions. We should not disregard these organizations and their needs, as we don't want to create a business landscape of only big box stores.

##### *Arbitrary exclusion of PPP materials based on generator*

Portions of the ICI sector consume items and products that fall under the PPP program yet they are prohibited from participating in recycling programs design to manage these materials. We assert that all program materials should be accepted by Recycle BC irrespective of the generator.

##### *Location Limitations for ICI PPP*

There are no private processors for ICI PPP in the Cowichan Valley Regional District (CVRD). The ICI PPP materials generated within the region must be transported to private processors in the Region District of Nanaimo or the Capital Regional District, which is both costly and time-consuming. As a result, we urge to province to consider merging residential and ICI streams, whenever possible.

##### *The Current PPP Set Up Breeds Dishonesty*

Due to the lack of realistic options, some small organizations keep trying to bring their ICI PPP to CVRD Recycling Centres. When turned away, some try incorporating their ICI PPP into the CVRD's residential curbside collection stream.

##### *Local Government Shouldering ICI PPP Costs*

To help ensure that small businesses are not forced to landfill ICI PPP material, the CVRD agreed with Recycle BC to accept a 10% "ICI PPP deduction" in the pay we get from Recycle BC for accepting residential PPP at our Recycling Centres. This means that the CVRD is using taxes to shoulder the cost of managing small volumes of ICI PPP to reduce needless landfills. This shortcoming in the current PPP program places further financial strain on the CVRD and its citizenry in addition to the per household amount CVRD residents are required to pay for the provision of curbside collection of recyclables.

Note: Our most recent ICI PPP survey (2023) concluded that the 10% deduction in PPP payment to the CVRD needs to decrease to 7% to be cost neutral to the CVRD.

#### *Unwanted Outcomes*

As there is a lot of pressure to reduce taxation, the CVRD is working to notify ICI customers that they must seek other alternatives for their PPP. However, as stated, there are limited local options at this time.

As a result of providing this feedback to ICI customers, the CVRD has received concerns that the alternative sites for ICI PPP are not really diverting this material, which highlights the need for regulatory oversight of ICI PPP.

### **2. Ideas or solutions for non-residential packaging your organization wishes to share:**

Merge ICI and residential Depot PPP to maximize operational flexibility and efforts to keep these materials separate.

Allow for home businesses to use their residential curbside tote for ICI PPP.

Establish regulatory oversight and financial incentives for ICI PPP to encourage local businesses to start collecting this material.

### **3. Where efforts should be prioritized:**

Allow for small business ICI residential PPP at Depots.

### **4. Anything you wish to share on the topic of how to improve the Province's approach to non-residential packaging and paper products:**

#### *Make it Easy for People to Do the Right Thing.*

Recycling must become more straightforward so our customers can more quickly determine what goes where. At this time, the PPP category is very complex, and it is, unfortunately, wholly unrealistic to expect all regional residents, regardless of whether they generate PPP as a resident or a business, to invest the current amount of time and effort required to understand how to recycle PPP correctly.

#### *Engage with Behavioural Scientists/Community Based Social Marketing Experts*

We encourage the Province to retain behaviour science consultants (or similar) to align the PPP program with people's everyday realities.

#### *Include More Common Products*

There are several additional products that we would like to see included in the program moving forward, e.g. reusable containers, as these also need an end-of-life solution when they are rendered unusable.

### **Discussion Paper Questions:**

#### **1. (Proposed Outcomes) Are there any desired outcomes missing from this list?**

- We encourage the *golden design rules* and *continued collaboration* with product and packaging producers and recyclers to ensure that problematic packaging is phased out (e.g. C&D strapping is hard to recycle, so a different system should be encouraged for holding materials together).
- Consider more *support and funding for recyclers*. Glass packaging is clean, but we don't have a smelter in BC. Is sandblasting the most and best used for glass packing? What else can we do?
- *Small communities need access* and measures that drive collection/service in areas outside of the large urban areas. Local government should not have to shoulder the costs of the lack of service.
- How do we incentivize reuse instead of recycling PPP?
- *Human Health and Environmental Protection* - The quality of material when using recycled content needs to be considered to ensure there are no health or toxicity problems, no impacts on durability, and no unintended consequences of being forced to use recycled content.
- There is the need to avoid a monopoly/monopsony for key services by a privately led entity.

#### **2. (Proposed Outcomes) What outcomes are most relevant to your business, organization, or community?**

- Develop clear categories for ICI PPP to better enable source separation (Consistency and Recovery)
- Affect reduction by mandating or incentivizing reusable packaging strategies, such as reusable business-to-business packaging (Prevention)
- Impose a province-wide ban on difficult to recycle ICI packaging materials and unsustainable packaging practices (Prevention)
- Develop a collection model for ICI PPP that is suited to rural and small population centers and establish appropriate incentives (Access and Economic benefits)

#### **3. (Proposed Outcomes) How would you prioritize these outcomes?**

Outcome priority: 1, 5, 2, 4, 6, 3.

#### **4. (Proposed Outcomes) Are there indicators or measures of success you would suggest are used to determine if an outcome is achieved or is achievable?**

- Plastics registry data on total plastics used (aim to get similar info on other materials) which needs to be decreased, then % of what is out there reused/recycled/captured. Include how much is captured by EPR programs and how much was not returned
- Details on kinds of materials per type (how much is designed for reuse and recycling for plastic, paper, glass, metal, etc.) and degree of recycled content
- Packaging use per capita
- Possibly some measure of packaging use per industry sector
- Reductions in use of virgin packaging
- Use of reusable packaging and cycles of use
- Disposal of packaging (total and per capita)
- Total disposal of all waste per capita (with a series of decreasing targets) of waste
- Number of ICI locations without three stream systems
- Reporting (verified by third party if possible) about where materials go (similar to existing EPR program requirements but a bit more stringent)
- Reporting on processing systems within BC (number, types, changes or improvements)

**5. (Provincial Target Setting) Should non-residential packaging targets be the same, or better than existing residential packaging targets? Why or why not?**

They should be higher because the residential ones are too low. It is unfortunate that 75% remains a static goal in the Recycling Regulation when many programs have achieved far more and been allowed to decline in capture. The ultimate target for all systems should be 100% capture by 2035 with interim targets. Have penalties to producers for failure (which are set higher than the cost of complying). There needs to be a strong focus on enforcement and having more control with ICI, using the learnings from the rollout of MultiMaterial BC. There should also be a goal of 20% reduction in total materials throughout every five years.

**6. (Provincial Target Setting) What types of targets would be most useful? Reduction targets; reuse targets; recycling targets; diversion targets?**

There should not be targets for diversion (though it should be reported), but reduction, reuse, recycling (both capture and ultimate recycling when sold as a material to be put back into similar products), and awareness among the ICI sector. There should also be targets for coverage (ultimately set at 100% with interim targets). There should also be targets provincially for positive regulations (similar to the provincial target for population covered by organics disposal bans) that could cover the % of population with dine in requirements, deconstruction bylaws, three stream sorting requirements, etc.). There could also be goals to support local circulation of food and products.

**7. (Provincial Target Setting) Should there be regional or business specific targets in addition to provincial targets? Why or why not?**

Yes, there should be targets by sectors that produce certain kinds of materials, as well as regional targets to ensure that it is not just urban areas that get action and service.

There should be targets to ensure all municipalities and First Nation communities that opt in get the same level of services.

New targets should get added as the situation evolves, such as for bans in certain single use items (not already covered) or restriction on the use of single use water bottles). There also needs to be an incentive to change behaviour and locations that offer free disposal undermine policy. There should be a target to have 100% of locations charge for disposal and then a sub-target on those that have different forms of Pay As You Throw. A policy and target supporting the use of clear bags for disposal should also be added.

Targets are important to motivate action and to be measure progress against.

Targets that get watered down over time (previous commitment to 350 kg/capita by 2020) or disappear (75% of population covered by organics disposal ban was considered complete rather than raise it once reached) create disillusionment.

**8. (Provincial Target Setting) How can we measure success or progress against established targets?**

It is important to gather the correct data and then make it public for transparency. There are serious data gaps in the existing system that need to be rectified. Data that needs to be improved is the total waste disposed. The Province should license all haulers and require data reporting by material type, customer type and any materials that cross regional or provincial borders. From a producer perspective, the federal plastics registry will cover one material but the Province could also consider tracking the other materials to have a more complete picture and understand shifts in the material flows and types.

**9. (Supporting Regional Planning and Local Actions) What actions are best suited at the local, regional, or provincial level of government?**

Ideally the provincial government would look at what materials and products are for a province-wide ban. This will save local government from needing to enact it locally and should drive materials to EPR programs (rather than the existing system of local governments waiting for EPR programs to provide adequate service locally before enacting bans). The Province should require the service. Consideration of enforcement (and by whom) and perhaps a phased approach -starting with audits, education, warnings and then later, penalties is suggested.

Also, at the provincial level: waste hauler licensing, waste hauler mandatory reporting (with data anonymized but made public for all Province, by municipality, First Nation community and RD), action on online deliveries and packaging. Where cross community services make data reporting difficult, a system to provide estimates based on a sound method should be used.

The Province should enact requirements for solid waste reduction plans as part of business licensing (including provisions to fill in gaps for areas where regional districts may not license businesses).

If any of the above are not pursued at the provincial level, empower local governments (including regional districts) to do them plus enact requirements for three stream source separation or more mandatory services, packaged services for all waste hauling, franchising areas, and bans of any type of single use item

Develop provincial templates so mostly harmonized and pre-approved for local governments to enact (including RDs).

Provide support to switch to reusable beverage and takeout ware systems province-wide.

Empower local governments to make their own bylaws regarding this without requiring each one to get provincial approval.

**10. (Supporting Regional Planning and Local Actions) What factors should be taken into consideration if the Province enables or promotes local actions?**

If the Province plans to take an action soon, then it should set out the scope for local governments to adopt the policy early (as occurred for many single use items); if not, empower local governments to regulate as they choose. Set up a policy working group so different municipalities can test out policy on different items and collective wisdom can be shared.

The Province should consider the following: what crosses boundaries and is better done at the provincial level and data needs.

**11. (Exploring Provincial Policies) What is already working to prevent packaging waste – for businesses, institutions, haulers, local governments?**

EPR for residential PPP with mandatory reporting and third-party audits is working to have an established program with verifiable data and producers paying a significant amount of the costs.

Product bans at different regulatory levels are working and should be expanded. Similarly, some disposal bans are having an impact as well as three stream sorting requirements.

Voluntary actions by some businesses and industry have also had an impact but need to be regulated to level the playing field.

**12. (Exploring Provincial Policies) Are there other actions that should be considered? What are they?**

- EPR is needed for ICI PPP.
- Possible additional taxes on problematic products or materials.
- There should be a clear bag mandate province-wide.
- A provincial levy on all disposal should be added to fund these provincial programs (and encourage all disposal sites to charge fees and have staff oversight of disposal).
- Three stream (or more) collection should be mandated.
- Systems should support cameras and scales on hauler trucks to capture better information
- A comprehensive provincial education and communications system on waste.

**13. (Exploring Provincial Policies) What are the benefits or limitations of these waste prevention options?**

We need all of them. As noted in the CCME Canada-wide Action Plan for EPR, EPR is not meant to be a stand-alone solution but part of a suite of policy that drives design and production in the right direction, helping to internalize many of the costs currently externalized today. We cannot just continue with siloed action but instead must implement a comprehensive, systemic plan.

Eg. Disposal bans. Problems with enforcement and compliance. Lack of education, people unaware. Do we have the human resources in place to enforce these bans? Enforcement requires capacity of local jurisdictions' money. Downloading of cost to local governments. Also, do bans have an influence on producers?

**14. (Exploring Provincial Policies) How ready are organizations, businesses, governments to implement?**

Some more than others so requirements should be phased in.

**15. (Exploring Provincial Policies) How should implementation be prioritized?**



Each of these actions are key priorities but the phasing may look different and should be coordinated. Focus on the large distributors for key impact, for example food suppliers like GFD, and Sodexo. It is important to make sure small businesses see EPR regulation as a benefit that will save time and money and be implemented in better way (The Province should build the cost-benefit case for the transition for the businesses). There is a need to ensure smaller communities get service from EPR programs and not require local governments to subsidize services. Where enforcement is required, consider the ability to enforce it and if there is a burden on bylaw enforcement. The system also needs to be robust. For example consider the impact of market value change where cardboard is now much less valuable so there is a need to market-proof the systems and go beyond recycling. Note that recycling costs continue to increase and allocating these costs to producers (not end users) is essential.

List of designated recycled material and supporting actions -should also include designate reusable products with supporting action.

Disposal bans should be enhanced by creating a map showing which areas have specific bans in place and working with RDs and local governments to ask who wants to be next to roll out new ones. Work to have a uniform map by 2030. That includes all easily recycled materials and all EPR programs. Include First Nation communities where they opt in and it is feasible based on waste systems. There is a need for fines and enforcement plus better solid waste composition audits (as noted below).

Reuse requirements will require the development of a specific plan that will be voluntary (with provincial support) to start and become mandatory by 2030. Single use items in foodservices (including dine in requirements) should be the starting place and include the sources noted in the discussion paper. There should be strong incentives to start with.

Waste prevention plans will also require the development of a specific plan that will be voluntary (with provincial support) to start and become mandatory by 2030 and include targets and ongoing development of tools and support (such as coaching and template plans by business type) based on the results. Reduction should be given a higher priority than recycling and organics composting; waste to energy should not be supported. It is key that this is paired with EPR of non-residential packaging so that there are incentives for producers to change design and offerings. This policy option could be phased in starting with audits then support for developing plans with standardized expertise and eventually making it a requirement (with some benefit for early adopters). It could be modelled on the Canadian Digital Adoption Program for improving marketing and technology with a list of qualified service providers to help develop plans, where organizations sign up for it and it may be subsidized by government and producers. Create a similar track for Small/ Medium business to encourage service providers and help businesses. Several non-profits and local governments have already assisted with aspects of this (e.g. Synergy, Ocean Ambassadors, District of North Vancouver, Squamish for waste audits and support).

Provincial data standardization and sharing should start with licensing all waste haulers/facilities, plus requiring EPR for ICI PPP and improved data collection from local governments. The database of this information will be required for waste planning at all levels and to set and monitor progress on targets. Data on reuse, and waste prevention initiatives and services should also be included.

The Province should standardize the waste audit system and get funding from SABC. The Province should coordinate waste audits to ensure coverage across the Province and adequate funding from the stewards while the Province and local government should divide up the non-EPR material costs. The Province should work with local governments on data collection, rotation around the Province to ensure sound data. Local governments who wish to conduct waste audits more often than 5 years can. Data needs to be made public and transparent.

**16. (Extended Producer Responsibility Programs) What are the benefits or limitations of expanded EPR options?**

The benefits could be myriad: synergies with existing programs and systems, costs driven back to producers so possibly gains in prevention and design change, especially if the program plan is actually required to follow the hierarchy (such as supporting reusable grocery containers like crates, bread trays, etc.). There is a need to ensure efficiencies by pairing with Recycle BC collection (allow small business to use residential systems where suitable), transport (particularly for smaller communities and First Nation communities), and possibly processing (regional, not program specific). There is a need to make the PRO a utility to ensure the best system and not prone to competition/non-competition issues.

Ideally, a new Crown Corporation is created to run the program to ensure that the issues identified in the roll out of the Multi Material BC program do not reoccur (disappearance of some well-qualified small businesses, lack of service in some areas, not adequately compensating local government service providers, challenges with access to markets for non-participants, lack of competition among service providers, etc.). By ensuring an EPR program, the costs are borne by the producers, not each small business and public institution (and fees on products may incentivize lower consumption). It follows the premise of no charge at end of use. When all ICI organizations have service, there could be synergies in the routes. There could be consideration of ensuring that waste hauling always includes a single rate that always includes all three streams (recycling options, organics collection and disposal) instead of allowing for selecting only some services. A bounty for the services could be offered to service providers instead of awarding winner take all contracts and allow service providers to compete based on service.

We've been required for years to separate the ICI PPP from residential PPP, both curbside and depot; now to turn on a dime and invite back the companies we've booted out might not go over well with the public.

**17. (Extended Producer Responsibility Programs) How ready are organizations, businesses, and governments to implement an expanded form of EPR?**

Many are ready already but others less so. There is a need for a widespread education campaign to ensure businesses, institutions and local governments understand their roles (as an end user or as a producer).

**18. (Extended Producer Responsibility Programs) Are there sectors or materials that should be prioritized to be included or excluded?**

None should be excluded but if there are some that are more challenging than others for specific producers, those could be phased in later -aim to get the easy work done first and iron out the wrinkles later.

There needs to be support for reusables in EPR systems and an assurance that reuse is rewarded, not penalized.

**19. (Extended Producer Responsibility Programs) How should implementation of EPR actions be prioritized (e.g. by sector, by material, by geographic location)?**

Policy Option 1. Expansion of EPR to include packaging and paper products from more sources. If needed, this could start with all areas outside urban areas in Metro Vancouver, Capital Regional District and the Fraser Valley Regional District (essentially where services may already be more robust). It is needed in these more rural areas as there are fewer waste haulers and often no ICI recycling. It needs to be paired with hauling /collection for Recycle BC for efficiency/central locations and possibly processing.

- PPP for all ICI packaging should be implemented (with an option to include a phase for the geography above or just do it all at once).
- It should include service to all retailers, accommodations, food services and offices.
- There could be possibly some kind of franchising to protect small haulers' access to market but also get rid of multiple trucks running in areas every day when one would do. Creative thinking and a Crown Corporation (instead of industry-led PRO) is needed to ensure the key outcomes are reached without the acknowledge pitfalls of the existing system.
- Pallets should be included
- Consideration of a de minimus clause to ensure small organizations are not targeted initially but with a clear schedule for onboarding those businesses in later years and Recycle BC requirements should be changed in concert with this.

**Policy Option 2. EPR stewardship for a specific sector.**

- The Clean Farms program should be regulated quickly.

- Health care could be its own sector for certain products.

20. Other issues identified:

- Some costs have shifted but there is still a significant subsidy from local governments for facility costs and services
- EPR cannot solely focus on a collection rate, it needs to support full access to services and prioritize redesign, reuse and then actual recycling (not just collection).
- some ICI businesses are already paying for system when they buy products intended for residential market
- Need for ecomodulated non-visible fees
- Need for EPR programs to invest in R&D -support innovation
- The Recycling Regulation needs an update to require programs and measurement for the upper part of hierarchy.
- Advocate for a strong plastics treaty that includes a significant decrease in plastic production.
- Do not allow new plastics production facilities in BC.

July 23, 2024

British Columbia Ministry of Environment and Climate Change Strategy

By electronic mail: [circularcommunities@gov.bc.ca](mailto:circularcommunities@gov.bc.ca)

**Re: Preventing Waste in British Columbia: Non-Residential Packaging and Paper Products Discussion Paper**

Electronics Product Stewardship Canada (EPSC) supports extended producer responsibility regulations (in the sense of mandatory take-back programs) as a solution to waste and recycling failures that occur due to wide distribution of products to dispersed populations of residential consumers. In general, this refers to the residential retail economy—i.e., consumers who shop at stores and bring the products to their homes, and increasingly those who shop online and receive the products through home deliveries.

We support the efforts made by the BC government on residential EPR programs. EPSC appreciates the opportunity to respond to the April 2024 discussion Paper on Non-Residential Packaging on behalf of our members who are obligated packaging producers with Recycle BC.

We are concerned about any possible expansion of EPR regulations to include Industrial, Commercial and Institutional (ICI) categories, but we are grateful that you have acknowledged the complexity of such expansions and invited comments. As you have stated, ICI encompasses many “sectors” which are so diverse that few generalizations apply. Every business, school, industrial facility, airport, shopping mall, boat dock, event venue, government office, etc., is potentially included in one or more ICI sector.

The Discussion Paper pointed out that non-residential packaging is more diverse than the residential packaging. This diversity poses barriers to integrating waste streams between residential and non-residential sectors. The investments required to unify these streams will result in an overall increase in waste management costs. A cost/benefit analysis is required.

In the Industrial, Commercial, and Institutional (IC&I) sector, waste generated by individual businesses is appropriately managed by specialized waste contractors based on the type and amount of waste produced. Therefore, it is worth considering whether unifying the waste stream is truly efficient as it will become a noncompetitive service. It may be prudent to limit the target to the packaging materials of businesses utilizing the general household waste stream, in accordance with the beneficiary-pays principle. In any case, it is important to carefully consider who will bear the financial burden of recycling, which will increase due to the expansion of the Extended Producer Responsibility (EPR) program.

In recent years, the transition to full EPR is already advancing in provinces beyond British Columbia, and the financial burden on companies has been increasing rapidly. Even in British Columbia, which has completed the transition to full EPR, the fee rate continues to rise annually. According to reports distributed by Recycle BC, the fee rate for 2023 increased by an average of

26% compared to the previous year. For 2024, the fee rate will further increase. We are concerned that including the IC&I sector's packaging in the recycling program could lead to an even greater increase in the fee rate and an inflationary impact on all packaged goods.

The British Columbia initiatives regarding waste reduction are commendable, careful consideration must be given to the expansion of the EPR program to the IC&I sector. A thorough analysis and understanding of the economic implications, cost-effectiveness, reduced market competitiveness, and appropriate allocation of financial responsibilities are essential to ensure the program's success and sustainability.

When you consider expanding EPR regulations into any ICI waste stream, EPSC urges you to ensure that you do so only to the extent that you have identified a specific problem and that EPR is a practical and equitable solution to that specific problem.

We recognize that some ICI "sectors" are analogous to the residential retail economy. For example, some small businesses buy their office supplies exactly as a household does and are effectively indistinguishable from residential consumers. In this narrow set of cases, EPR may be appropriate.

In contrast, most ICI contexts are not analogous to the residential retail economy because the waste streams are concentrated rather than dispersed and waste management is integrated into each facility's bundle of planned systems. Businesses and institutions are legally obligated to manage their wastes, and if not, they need to be, which is appropriate because they make large-scale purchasing and waste management decisions based on information within their exclusive control. In such cases, the imposition of an EPR obligation has the effect of arbitrarily forcing an outsider to assume some portion of a waste generator's existing liabilities.

In many ICI settings, the "consumer" (i.e., the company or institution that makes the final purchase) also acts as a producer, which creates a potentially confusing legal problem in the assignment of responsibilities. To take a straightforward example, restaurants and corporate cafeterias are both institutional customers in relation to upstream producers and suppliers in relation to their patrons. An EPR mandate could presume that the cafeteria is an obligated producer or that it is a non-obligated consumer—potentially resulting in an arbitrary assignment of legal consequences that fits some circumstances better than others.

Instead of deciding "to expand EPR to include ICI generated waste and recyclables," as the Discussion Paper describes it, EPSC hopes that the Ministry will focus on identifying specific problems and practical solutions. It is the responsibility of governments to strengthen and enforce regulations for ICI actors to make them more accountable and have them contribute to waste diversion objectives. It is also the responsibility of government to collect data on ICI recycling rates to ensure that regulations are only developed if necessary.

EPSC believes that the vast majority of ICI waste streams are best managed by the particular business or institution that creates them, generally in accordance with the legal obligations that apply to a property manager or waste generator. Therefore, product stewardship regulations such as the paper and packaging program should not extend to any ICI waste streams except in special cases where EPR is a practical and equitable solution to a specific problem.

Landfill bans of packaging and paper products are necessary to ensure the IC&I and waste sectors do not choose the least expensive option open to them to manage their waste, landfilling. The cost per tonne to collect back and process packaging waste according to Recycle BC's 2023 annual report is \$666/tonne, which is expected to rise. The cost to landfill varies but is estimated at \$134/tonne. The financial incentive for individual institutions and service providers clearly favours landfill. This incentive needs to be changed with a landfill ban in order to achieve the desired recycling results while maintaining the competitive market that individual business contracts provide.

Please feel free to contact me if you require additional explanation.

Sincerely,

A handwritten signature in blue ink, appearing to read 'S Kerr', is positioned below the word 'Sincerely,'.

Shelagh Kerr  
President and CEO  
EPSC

EPSC membership: Apple Canada Inc.; Asus; BenQ America Corp.; Brother International Corporation (Canada) Ltd.; Canon Canada Inc.; CIARA Technologies; Cisco Systems Inc.; Dell Canada Inc.; Epson of America Inc.; Fujitsu Canada Inc.; HP Canada Co.; Hewlett Packard Enterprise; IBM Canada Ltd.; LG Electronics Canada Inc.; Lenovo Canada Inc.; Lexmark Canada Inc.; Microsoft Corporation; Northern Micro Inc.; Oracle America Inc.; Panasonic Canada Inc.; Ricoh Canada Inc.; Samsung Electronics Canada Inc.; Sony of Canada Ltd.; TCL North America.

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July 22, 2024

Ministry of Environment and Climate Change Strategy  
PO Box 9047 Stn Prov Gov  
Victoria, BC V8W 9E2

Submitted via email: [Circularcommunities@gov.bc.ca](mailto:Circularcommunities@gov.bc.ca)

### **RE: Preventing Waste in British Columbia: Non-Residential Packaging & Paper Products**

Thank you for the opportunity to comment on the Discussion Paper on Industrial, Commercial, and Institutional (ICI) Packaging and Paper Product (PPP) waste entitled “Preventing Waste in British Columbia: Non-Residential Packaging and Paper Products.”

FCL, based in Saskatoon, SK, is a unique, multi-billion-dollar co-operative owned by more than 155 autonomous retail co-operatives (local Co-ops) across Western Canada; 18 are in British Columbia. Together, FCL and these local Co-ops form the Co-operative Retailing System (CRS). In British Columbia, the CRS employs 2,980 people across 100 communities providing 408,940 members (and non-member customers) agricultural, energy, food and home and building solutions.

Federated Co-operatives Limited (FCL) supports the response provided by the Retail Council of Canada (RCC) and is submitting these additional comments on behalf of FCL and the eighteen local Co-op Associations that operate in British Columbia.

FCL supports the following high-level actions further outlined in RCC’s comments:

1. Clear definitions of which industrial, commercial and institutional sector players are being regulated.
2. Creation of a list of designated recyclable materials.
3. A province-wide landfill ban for those designated recyclable materials.
4. Mandatory legal obligation to recycle designated materials.
5. Producers of industrial, commercial and institutional waste take responsibility to organize and pay for the management of their own waste.
6. An incremental approach where other solutions (e.g., waste management plans and sectoral extended producer responsibility) are used if and where the combination of material lists, landfill bans and obligatory recycling does not produce the desired outcomes.

FCL supports the position that if there is no ability to recycle the material, it should not be listed. As recycling technology evolves, material lists can be reviewed and materials added as options are available.



**Provincial data standardization and sharing**

FCL supports RCC’s proposal of making use of existing regional district and local government waste audit data to monitor progress and avoid double counting. In the event government chooses to mandate businesses to report, consultation to avoid significant operational impacts, costs and duplication is encouraged.

**Expansion of EPR to include packaging and paper products from more sources**

Many local Co-ops operate in remote geographic areas in British Columbia, which may have limited access to recycling options and high transportation costs. FCL supports RCC’s perspective that the existing residential recycling system can provide some assistance to manage the recyclable material from a small selection of institutions and commercial enterprises – where those entities are participating equitably in paying the costs.

FCL supports RCC’s view that waste beyond small businesses operating on main streets, small residential facilities that provide some health care, and public schools could be accepted by Recycle BC and/or their collectors, transporters and processors. However, RC does not think it is equitable that businesses pay for the waste of others. Accordingly, RCC suggests that the government consider negotiating an agreement with Recycle BC to provide only those regional districts, local governments and First Nations outside the Lower Mainland and Lower Vancouver Island with access to the network for certain designated materials.

FCL is paying EPR fees for the communities that local Co-ops operate in and suggests that local Co-ops be able to participate in the Recycle BC program.

**Timeline**

FCL supports the following timeline and corresponding activity proposed by RCC:

One year following publication	Implementation of landfill ban
Three years following publication	Implementation of requirement to recycle Implementation of enforcement
Five years following publication	Re-examination of results and consultation on further changes

In summary, FCL’s view is that the proposed actions outline above, and in the comments provided by the RCC will provide the best environmental outcomes to British Columbians at the lowest cost to business and consumers. Thank you for the opportunity to provide comment.

If you require further information or wish to arrange a meeting regarding the above, please contact Cole Kander, Government Relations Manager, at Cole.Kander@fcl.crs or by phone at 780-608-5004.

Regards,



Vern Albush  
Director, Sustainability  
Federated Co-operatives Limited

July 22<sup>nd</sup>, 2024

Honourable George Heyman  
Minister of Environment and Climate Change Strategy PO Box 9047 Stn Prov Gov  
Rm 112, Parliament Buildings  
Victoria, BC V8W 9E2  
Submitted by Email: [Circularcommunities@gov.bc.ca](mailto:Circularcommunities@gov.bc.ca)

## **RE: Husky Technologies™ Response to “Discussion Paper - Preventing Waste in British Columbia: Non-Residential Packaging & Paper Products”**

Dear Minister Heyman,

Husky Technologies™ (Husky) appreciates the opportunity to respond to British Columbia’s (BC) Ministry of Environment and Climate Change Strategy [Discussion Paper](#) on preventing paper and plastic packaging waste from the non-residential sector.

Since 1953, Husky Technologies™ has been pioneering technology to help deliver the essential needs of the global community with sustainability-focused and industry-leading expertise and service. Headquartered in Canada and employing over 1,300 people in Canada, Husky is powered by teams of exceptional people, operating in over 140 countries. Husky is actively innovating on solutions and technology that support the design for circularity of plastics and allow for the use of recycled content. For example, our systems are capable of processing [up to 100% post-consumer recycled content](#), and we are signatories of the [Ellen McArthur Foundation’s Global Commitment](#), reflecting our dedication to continuing to innovate for circularity. By focusing on sustainably sourced feedstocks, material reuse and use of medical-grade polymers, Husky continues to be committed to sustainability now and in the future.

### **General Comments**

We share a desire for a well implemented circular economy for British Columbia that considers the full life cycle of all materials, overall environmental impacts, recyclability, recycled content, and improved post-use materials management. We applaud British Columbia’s efforts to provide concrete actions that improve the recycling of plastics and prevent pollution. We view recyclable “waste” not as waste, but rather as a resource that should be kept in the economy as long as possible as this is a key component to preventing pollution.

Husky supports BC goals to reduce PPP waste in the province by incorporating an improved circular economy around non-residential packaging. With the success of the province’s residential Extended Producer Responsibility (EPR) program achieving a 49% per cent recycling rate, B.C. has the unique opportunity to capitalize on the leadership it has already demonstrated.

### **Discussion Questions**

#### **2. Discussion Question #2 - What outcomes are most relevant to your business, organization, or community?**

The main purpose outlined in the discussion paper, prevention of waste from non-residential packaging, is the most relevant to our organization as we strive for and encourage the collection of recyclable materials as a key component to the circular economy. Keeping PPP products in the

economy and out of the environment and landfill should be done in a way that grows end-markets for recycled plastics and materials of all kinds, expanding recycling infrastructure in the province and creating stable jobs.

### **3. Are there indicators or measures of success you would suggest are used to determine if an outcome is achieved or is achievable?**

Establishing minimum recycled content requirements for all packaging materials, including plastics, provide a benchmark of success as well as a method to achieve the desired outcomes.

Recycled content targets are a specific driver that can ensure material is reused, even where recycling access is not currently available. Leveraging recycled content targets will help reduce waste while allowing industry opportunity to innovate solutions, invest in infrastructure everywhere, and would benefit all British Columbians.

Provincial government can help provide guidance through a framework of recommendations to support a circular economy, as well as provide funding for improved resource management infrastructure to municipalities. When considering policy options to manage packaging waste from the ICI sector, Husky recommends adopting an approach that sets concrete targets for materials recovery, developed in conjunction with the regulated entities (i.e. industry) that would allow for a more effective ICI waste management program.

**Recommendation:** Work with the regulated entities to set realistic quantitative targets for recovery/recycling that allow for continuous improvement over time.

### **5. Should non-residential packaging targets be the same, or better than existing residential packaging targets? Why or why not?**

Due to the diversity of the ICI sector, and the significant variation in packaging types and volumes, the targets should be designed to address the sectors unique challenges. [PPP in the disposal stream may range between sub-sectors from 10% \(Health Care Facilities\) to 36% \(Food Service\)](#). Specific material type proportions can also range broadly between sub-sector, highlighting the challenge behind setting one target and specifically a target the same as set for residential.

### **6. What types of targets would be most useful? Reduction targets; reuse targets; recycling targets; diversion targets?**

Measures such as recycled content requirements, or diversion targets, can be effective drivers that support the goal of reducing overall waste from PPP (see above answer to Discussion Question #3). A well implemented EPR scheme is a tool proven to promote circularity and sustainable packaging design. A well designed EPR scheme can fund and support recycling infrastructure, as well as material recovery, ultimately reducing waste from PPP.

Reductions are not effective targets, as they would require substitutes or alternatives to replace the material reduction target. It is critical to consider the full environmental impacts of alternatives that may cause unintended harm. We encourage starting with a full, holistic consideration of alternatives and their consequences. The evaluation should consider how the material/product:

1. Preserves and protect, and effectively performs the function for which it was originally intended.

2. Minimizes environmental impacts such as waste, carbon emissions, water use, deforestation, and mining.
3. Is available, affordable and scalable, such that it considers the needs of all people.

Plastics can often be the most suitable material when holistically considering these factors. In the beverage market, polyethylene terephthalate ([PET](#)) [has demonstrated to have the lowest environmental impact compared to alternative materials](#). Water bottles made of PET preserve and protect, while also facilitating affordability and availability.

## Reuse Models

- There are substantial health risks and social impacts that are essential to consider when evaluating reuse models for food-contact products in particular. The first consideration should be to evaluate, based on science and data, whether a reuse model is in fact a suitable option for reducing pollution and waste. Some questions that should be considered include:
  - How will hygiene and food safety standards be monitored and ensured in reuse systems, as they pose risks of tampering of the product?
  - How would reuse systems work for perishable products?
  - How will a shift to reuse systems impact the amount of food waste generated?
  - How will all British Columbians be assured of equitable access, both physical and economic, in a reuse system?
- Reuse models pose risks of cross-contamination, infection, allergies, and foodborne illnesses among other health risks. A [recent report](#) by the European Paper Packaging Alliance found that “The potential for the persistence/transfer of foodborne pathogens on reusable packaging and food service ware, remains a clear and present hazard, especially at the retail/service/consumer interface.”
- Reuse models may also increase food costs with the need for investment in proper infrastructure, disproportionately impacting vulnerable and lower-income communities. A recent Angus Reid study found that [35% of Canadians say it is difficult to feed their household](#). Reuse models can reduce the shelf life and quality of food, leading to increased food waste and greater risk of food insecurity. Longer life foods with Modified Atmosphere Packaging or "Refrigerate after opening" are constrained and need to be consumed or alternatively stored before consumption. The unintended consequences of shifting to a reuse system would make food security an even greater challenge.

**Recommendation:** BC should favour a phased in, adaptive approach when developing and implementing a program to manage ICI waste packaging to take into account the above considerations. Reuse models and their impacts should be evaluated through a holistic, Life-Cycle Analysis approach.

## **7. Should there be regional or business specific targets in addition to provincial targets? Why or why not?**

Due to the diversity of the ICI sector, a uniform requirement across a range of entities is challenging due to varying degrees of infrastructure, knowledge, and resources to manage PPP flows appropriately.

Husky does not support requiring individual businesses and institutions to create, manage, and report on individual waste prevention plans. This has the potential to create a fragmented waste management landscape within the province that would not be an improvement on the status quo. The challenge of dealing with plastic pollution in BC must be dealt with holistically with clear

targets and processes for regulated entities. This policy proposal would also make it more difficult to align with upcoming ICI waste management approaches underway in other provinces.

## **Extended Producer Responsibility (EPR)**

- Husky commends British Columbia for the outstanding performance of its EPR residential program for paper, plastics, and packaging. The program's success is evident in the remarkable accessibility and efficiency it offers to residents, with 99.3% of households having access to recycling services and an overall plastic recovery rate of nearly 50%.
- Husky supports BC's efforts to keep more PPP products in the economy, and out of landfill and the environment by including the ICI sector. However, it is important to recognise that the regulated entities in the residential space will be different than those in the ICI space, so separate and distinct regulations and responsible parties should be identified. Furthermore, we would like to recommend that the following general principles be kept in mind:
  - Ensure a gradual and orderly inclusion of that over a reasonable timeline that ensures cost increases can be passed on to the regulated entities evenly and incrementally.
  - Ensure transparency in communication and decision-making, as well as meaningful engagement and consultation with all regulated entities throughout the process.
  - Ensure the regulated entities have sufficient flexibility in making business decisions and establishing new commercial arrangements with service providers for the new products in order to meet waste diversion targets and collection standards.

**Recommendation:** Create a separate regulation and management approach for the ICI sector that provides the flexibility and adaptability to address the diversity of the ICI sector and allows for an efficient transition to a Responsibility Organization model of managing outcomes.

## **Other Policy Approaches**

Husky does not support regional disposal bans for packaging materials as they often result in unintended consequences, when alternative approaches can deliver the intended outcomes more effectively. Rather than banning the disposal of plastics, B.C. could increase the recycling rate of those items through specific incorporation in waste management programs and by investing in recycling opportunities in British Columbia. Waste management programs driven by the regulated entities are designed to incentivize efficient collection, sorting, and recycling.

**Recommendation:** Rather than implementing disposal bans for ICI packaging, British Columbia should instead develop a provincial waste management program that includes these materials and that incentivizes provincial action and industry solutions for sustainable management.

## **Conclusions**

Husky shares the BC government's interest in creating a circular economy for plastics and diverting plastics from landfills so they may be viewed as a resource and not a waste material.

Husky appreciates the opportunity to provide comments on BC's approach to manage paper plastic packaging from the non-residential sector. Husky is committed to supporting British

Columbia's efforts to reduce plastic waste through sound policy, regulation, and innovation. By fostering a circular economy, we can achieve significant environmental and economic benefits.

We urge the government to consider our recommendations to enhance the effectiveness of the proposed strategies for the non-residential sector, and strongly advocate for a science-based approach to a circular economy that **keeps all materials, including, plastics in the economy, and out of the environment**. Whether it is plastic, glass, aluminium, cartons, paper, or any other material, no material should end up in the environment. There are proven systems and actions that governments can take that work to reduce pollution, as outlined above.

Thank you again for the opportunity to provide our input, comments, and expertise on this matter. If you have any questions or would like to discuss any of our points further, please do not hesitate to contact me directly at [tferlin@husky.ca](mailto:tferlin@husky.ca). Husky looks forward to being a resource for you during this process.

Sincerely,

*Tania Ferlin*

Tania Ferlin  
Director, Sustainability Advocacy  
Husky Technologies

## Non-Residential Packaging & Paper Products Discussion Questions

### CSRD

1. Are there any desired outcomes missing from this list? – No
2. What outcomes are most relevant to your business, organization, or community? – As the Regional District we manage commercial recycling at several of our Landfills and Transfer Stations. Already the CSRD subsidizes the ICI recycling and would agree that all the outcomes listed are relevant to our organization.
3. How would you prioritize these outcomes? – Prevention First, Access , Accountability and transparency, Consistency and confidence, Maximize material recovery and Economic benefits for a strong circular economy.
5. Should non-residential packaging targets be the same, or better than existing residential packaging targets? Why or why not? – Targets should always be improving. The challenge with targets in the province is that an EPR program can collect in the lower mainland and achieve all the targets they require. More emphasis needs to be placed towards rural collection of ICI and target rates for a EPR program.
6. What types of targets would be most useful? Reduction targets; reuse targets; recycling targets; diversion targets? – Reduction and reuse targets would be most useful as those are the best options for reducing the amount of material that is being handled.
7. Should there be regional or business specific targets in addition to provincial targets? Why or why not? – Business specific targets should be developed for ICI sectors that produce large volumes of material in order to foster innovation on reduction and reuse.
8. How can we measure success or progress against established targets? – Similar to how the Recycle BC program determines success by comparing what was recycling was collected to what amount was placed into the marketplace on a yearly basis.
9. What actions are best suited at the local, regional, or provincial level of government? – In the CSRD there are two Resort Municipalities and similar to other Resort Municipalities currently there is very limited options for ICI Recycling. The province could provide more funding for collecting and education in these municipalities as a high percentage of visitors are from out of town and they are rural and remote. Solid Waste Management plans can outline strategies, goals and bylaws but they also need to align with provincial strategies.
11. What is already working to prevent packaging waste – for businesses, institutions, haulers, local governments? – The CSRD diversion programs do not have the staff capacity to work on programs to prevent packaging waste in the region. The CSRD will need support from the province to engage in prevention of packaging waste.
12. Are there other actions that should be considered? What are they? - No
14. How ready are organizations, businesses, governments to implement? – Just like what occurred with the Recycle BC program, Regional Government will transition to a new system and work on educating ICI sector.



15. How should implementation be prioritized?- Disposal bans outlined in Solid Waste Management Plans work well if there is staff capacity to manage the bylaw. Reuse requirements should be made a top priority and standardizing the system throughout the province.

16. What are the benefits or limitations of expanded EPR options? The limitations of EPR programs are they do not always cover the cost of the program and local and regional governments are having to subsidize the programs. The benefits of EPR program are that it can be province wide program.

17. How ready are organizations, businesses, and governments to implement an expanded form of EPR? Local and regional governments would be ready to see an expanded EPR program as they are the ones who are dealing with some of this material either coming to landfill or diverting it.

July 13, 2024

Dear CleanBC,

KC Recycling is one of two polypropylene recyclers in BC. We produce almost 5000MT of PCR resin annually.

We have been the recipient of grants from the CleanBC Plastics Action Fund and appreciate the continued cooperation with the province.

We have limited our comments to one critical area – Recycled Content Requirements

BC Plastic Recycled Content requirements must include **industrial** products, not just consumer packaging. This will create a market for recycled resin that cannot be used in consumer applications, as is the case for most non-residential plastic. There are many polypropylene molders in Western Canada and the Pacific Northwest who use exclusively virgin resin to make industrial products such as paint buckets, automotive parts, and agricultural pots. Industrial Product Recycled Content requirements will create strong local markets for recycled plastic resin.

Thank you for your consideration. Please feel free to contact me at any time.

Sincerely,  
Pete Stamper  
CEO, KC Recycling  
250-231-7680

PO Box 9360 Stn Provincial Government  
Victoria, BC  
V8W 9M2

Dear Minister,

As the Business and Climate Advisor for the Nelson District Chamber of Commerce, I am writing to express our support for the discussions concerning non-residential packaging and paper products. The Nelson District Chamber of Commerce represents more than 500 small businesses within the greater Nelson area, all of whom are deeply committed to sustainability and environmental stewardship.

In 2011, the province amended the Recycling Regulation to make large businesses responsible for collecting and recycling their packaging and printed paper products. While this shift aimed to incentivize producers to minimize packaging and waste, it has inadvertently created significant challenges for small businesses in rural areas and smaller communities.

The changes in 2020, which excluded industrial, commercial, and institutional (ICI) materials from the Recycle BC program, have exacerbated these challenges. Businesses and institutions in our region are now often forced to either send recyclables to landfills or bear prohibitive costs for hauling and processing. This situation is untenable and counterproductive to our collective environmental goals.

The environmental impact of these regulatory gaps is profound. Without accessible and affordable recycling options, businesses and institutions are left with few choices but to contribute to landfill waste, undermining efforts to reduce our ecological footprint. The lack of infrastructure to support comprehensive recycling programs in rural and remote communities exacerbates this issue, leading to increased pollution and resource depletion.

Despite the advancements and improvements made by Recycle BC, including the BC Extended Producer Responsibility 5-year action plan, there remains a critical need for faster resolution of the sector's deficiencies. The complexity of the ICI sector, combined with the unique challenges faced by rural and remote communities, requires urgent and tailored solutions.

Private residents in our region can self-haul recyclables to a Recycle BC depot or waste transfer station, yet businesses and institutions are excluded from this option. This exclusion is particularly detrimental to schools and other organizations, which generate significant amounts of recyclable materials but lack viable disposal options under the current regulations.

We urge the Ministry to prioritize the development of inclusive and sustainable waste management solutions that address the needs of small businesses and institutions in rural areas. By doing so, we can better protect our environment, reduce waste, and support the economic vitality of our communities.

Thank you for considering our perspectives and for your continued efforts to enhance environmental sustainability in British Columbia.

Sincerely,

*Grace Henecka*

**Grace Henecka**  
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**NELSON** AND  
**DISTRICT**  
CHAMBER OF COMMERCE



July 23, 2024

Delivered by EMAIL: circularcommunities@gov.bc.ca

Good Day Minister Heyman,

Thank you for the opportunity to respond to the Preventing Waste in British Columbia Non-Residential Packaging & Paper Products Discussion Paper. We also appreciate the agriculture-focused webinar on this topic held on July 16, 2024.

The BC Landscape & Nursery Association (BCLNA) represents nursery growers, independent garden centres and landscape professionals in B.C. BCLNA fully supports CleanBC's goal of maximizing material recovery and reducing pressure on the landfills in a cost-effective manner.

We recommend:

1. supporting and recognizing current voluntary recycling programs and using incentives for incremental improvements before considering regulatory approaches.
2. funding for new or expanded facilities that can economically recycle products which currently can not be recycled locally.
3. transition funding for agricultural operations to move from current non reuseable or recyclable/compostable materials to other production methods to reduce those materials.
4. establishing realistic and achievable targets for reduction or recovery
5. consider off setting EPR costs for producers on a declining scale to reduce the jump in price in supplies to our sector to enable a gradual increase in costs.

On the last point, our concern with EPR is that the added costs, estimated to be 5% to 10%, to cover the additional requirements of data collection, reporting and auditing, will be passed onto our growers. Many growers are in long term contracts with buyers and cannot pass these onto the end consumer. This is a particularly difficult time due to rising labour, fuel, fertilizer costs. An increase in supply costs of this magnitude would result in a significant burden. Government may consider subsidizing these costs to the EPR producer to initiate the program, and then over time reduce it.

Once again, thank you for the opportunity to comment and we look forward to further engagement as policies and programs are being developed.

Sincerely,

Paula Baxter  
Chair, BC Landscape & Nursery Association

Coreen Rodger Berrisford  
Executive Director, BCLNA

## **PREVENTING WASTE IN NON-RESIDENTIAL PACKAGING**

**Feedback from Recycling Alternative: Louise Schwarz/ Robert Weatherbe**

**Thoughts on:**

**• Issues or concerns you think we should be aware of;**

*In ICI one size does not fit all; the program may have to consider a 'multi-pronged' approach in terms of effectiveness for*

*- ICI collections can range considerably in the materials being collected depending the industry type (i.e. a restaurant, next to a hair salon, next to a paint store , next to a bank, next to grocery; all will generate some similar, but many different streams in different containers - i.e. pallets stacked 'loose' on the dock)*

*-rural vs dense urban areas (where services are readily available)*

*-sectors (i.e. what is effective for restaurant/ hospitality - where guests are coming from out of town; vs large retail & shopping malls, offices towers etc where tenants & custodial staff remain constant and can receive consistent/ongoing education & training*

*-stadiums, arenas, large public venues where large /inconsistent volumes and specific types of materials are generated in a short time period as consumers 'pass through' attending events/concerts etc; materials and food generated will be primarily post consumer (i.e take away/napkins etc vs actual food etc)*

**• Ideas or solutions for non-residential packaging you or your organization wishes to share;**

*-Possible 'green' incentives offered to businesses for doing it properly, rather than focusing on fines/enforcement for not doing it properly; i.e. enviro tax or benefit with business license?*

**• Where efforts should be prioritized;**

*-We agree with prevention as top priority, however this part of the hierarchy cannot be reached until the areas lower down in the hierarchy are absolutely and verifiably resolved and aligned.*

*-Prevention will require dramatic changes in the type, make-up and volume of packaging; i.e. regulation for what types of plastics can/cannot be used; regulation for percentage of a product weight/volume that can be packaging vs the actual product etc*

*-For prevention to be effective, businesses also need broader options for reusable /reduced packaging/circular economy services/infrastructure and to understand the cost benefit and also environmental alignment that they are participating in. This means ensuring consistency in expectations, and confidence further down the hierarchy from consumers/businesses that materials are being effectively recovered through transparent reporting in what happens to recycling; that there is a benefit to their business;*

*-all businesses should be required to perform a documented waste audit (possibly visual)*

*-Communicating verifiable data for businesses to understand the province's systems; which products in their supply chain/procurement practices have verifiable value markets; can & will be recycled into new products*

• **Anything you wish to share on the topic of how to improve the Province's approach to nonresidential packaging and paper products.**

*-Creating an EPR will not address the #1 priority of PREVENTION ;*

*-Caution against introducing EPR systems, that can function more effectively if regulation requires markets*

*-an assumption is being made currently that ICI is not recycling effectively, because currently no data is supplied by the sector (both the businesses, haulers)*

*-however, the region (i.e. Metro) does receive data through its transfer stations & licensed brokerage/MRF facilities; which could provide the basis of aggregated data for materials collected (i.e from haulers indicated whether the load they are tipping is ICI or residential)*

**In response to the 19 questions posed throughout the discussion paper:**

**1) Are there any desired outcomes missing from this list?**

*-Perhaps an acknowledgement that new circular & local processing infrastructure needs to be innovated/developed and delivered to businesses in order to achieve PREVENTION*

**2) What outcomes are most relevant to your business, organization, or community?**

*-Consistency/level playing field in our systems which we acknowledge may have to vary from region or sector to fully accommodate the needs & operating realities of different sectors or areas of the province*

*-our concern as a recycling company both collecting & processing materials, is that an EPR could either 1) monopolize the market both in terms of services & materials processing for or clients; 2) reduce innovation opportunities; 3) reduce options for specialized, local, circular recycling solutions*

**3) How would you prioritize these outcomes?**

1) *Consistency, Confidence, Access*

2) *Transparency/Accountability/Verifiable Materials Recovery*

3) *Economic benefits of Circular Econ & Jobs*

*-We would add priorities of INNOVATION & better REPORTING /DATA tracking from ICI*

*-During all of the above, **continue to work on and drive Prevention** - throughout the process as this is a much longer play and will require major strides in types of packaging manufacturing - generally outside BC's market/jurisdiction*

**4) Are there indicators or measures of success you would suggest are used to determine if an outcome is achieved or is achievable?**

*-Level of awareness amongst businesses; for example, we are not sure the degree to which businesses are aware of/engaged with this call for feedback on the plan? (i.e. none of our large commercial clients, who manage large ICI properties have asked us about this topic/engagement, which indicates they may not be aware of potential impacts of these priorities or EPR on their operations/tenants/ waste practices/supply chains*

-

**5) Should non-residential packaging targets be the same, or better than existing residential packaging targets? Why or why not?**

*-Same is fine, however recycled content target should be more ambitious and start at 30% and have an incremental increase plan to move to 50% by 2030*

**6) What types of targets would be most useful? Reduction targets; reuse targets; recycling targets; diversion targets?**

*-#1 reduction targets; it is hard to find ways to measure ICI sector reduction targets; (i.e. if a business avoids/prevents waste in the first place through circular or regenerative purchasing, how could we measure and quantify their benefits); are there ways to measure reduction strategies (i.e. introducing re-use options for operations such as stadiums, food courts etc; reusable shipping boxes/totes can work for local supply chain (i.e. Mills Office supplies etc), but with international supply chains reuse options for packaging are not available*

**7) Should there be regional or business specific targets in addition to provincial targets? Why or why not?**

*Possibly a combination of both:*

*REGIONAL for rural areas*

*BUSINESS SECTORS - for urban areas (i.e. hospitality; health care; retail; office; schools; C&D etc)*

**8) How can we measure success or progress against established targets?**

*-Reporting mechanisms that measure real impact not just numbers at the end of the tailpipe i.e. haulers could identify commercial material when they get to the processing or disposal facilities;*

*-Brokerage facilities already provide quarterly data on material volumes and chain of custody*

**9) What actions are best suited at the local, regional, or provincial level of government?**

*-Residential EPR - for rural business/ICI sector to piggy as they are generally small volumes but longer distances;*

*- ICI materials in Metro should be reported by Metro; same for Capital Regional District; ICI materials outside urban areas should be collected/reported through EPR, due to small volumes, longer distances*



**10) What factors should be taken into consideration if the Province enables or promotes local actions?**

*-Allow Commercial operators to 'OPT IN' to EPR programs that are reserved for residential (i.e. if a service provider collects clean /flexible plastics or other types of package and does not have a market for these materials, allow them to 'opt in' to the EPR program)*

**11) What is already working to prevent packaging waste – for businesses, institutions, haulers, local governments?**

*-To date the Recycling Regulation/EPR has not been an effective tool to achieve PREVENTION or re-design;*

*-However regulation/legislation to ban problematic plastics has achieved some PREVENTATIVE measures*

**12) Are there other actions that should be considered? What are they?**

*-More, non-EPR legislation will drive commercial innovation and adaptation to new opportunities*

**13) What are the benefits or limitations of these waste prevention options?**

*-See #16 below*

**14) How ready are organizations, businesses, governments to implement?**

*-Most organizations and businesses are under long term hauler contracts that will take up to 5 years to remove or change in favour of better prevention and verifiable recovery practices*

**15) How should implementation be prioritized?**

*-By opening the door to mandates and support of market place materials recovery solutions and opportunities for circular innovation as a departure from 'business as usual' waste practices*

**16) What are the benefits or limitations of expanded EPR options?**

**LIMITATIONS:**

*-Most EPR's have failed in delivering on 2 of their principal goals/purposes: 1) to innovate and therefore reduce packaging at the top of the hierarchy; 2) support behaviour change towards waste reduction. Instead, EPR programs can be prone to 'business as usual approach' which is most comfortable/convenient for the stewards who govern the program; rather than innovating and tackling the problem at its root causes. There remains a problematic lack of effective shifting upstream to tackle waste prevention/elimination through improved re-design of packaging.*

*-If materials in EPR programs do not have verifiable, high value recovery options for 'problematic plastics', the EPR system is merely 'shifting' the avenue of disposal from direct to landfill, to a programmatic detour through EPR collection systems that result in the same disposal outcome for low-grade /non-recoverable/residuals which have to be removed and landfilled/incinerated as they contaminate the recoverable plastics in the stream.*

*-EPR's generally create an unlevel playing field*

**BENEFITS:**

*-Current EPR is a consistent system; provides access in rural areas*

*-Current EPR's are a system for 'counting and quantifying' at the end of the tail-pipe ; they provide data to municipal/regional gov'ts for Solid Waste reporting & planning*

**17) How ready are organizations, businesses, and governments to implement an expanded form of EPR?**

*-See # 14*

**18) Are there sectors or materials that should be prioritized to be included or excluded?**

*-Grocery chains to reduce 'avoidable' food waste (that could be donated)*

*-Improve food packaging solutions for grocers to provide reduction of plastics packaging, since they are already paying considerably into the PPP EPR for residential*

**19) How should implementation of EPR actions be prioritized (e.g. by sector, by material, by geographic location)?**

*By REGION for Rural*

*By SECTOR for Urban areas*

July 23, 2024

Email: [Circularcommunities@gov.bc.ca](mailto:Circularcommunities@gov.bc.ca)

## Preventing waste in BC: Non-Residential sector in Paper & Packaging waste

Dear BC team,

Lactalis Canada appreciates the opportunity to provide comments regarding the subject matter. Please find how we summarize the key findings in the paper:

### **Fact base and ambition:**

- BC disposes of 2.5 million tons of solid waste/year from households and businesses (500 Kg/capita/year) – BC aspires to reach to 350 Kg/capita/year.
- 99% of residents have access to curbside collection and recycling including multi-family building recycling and depot collection but main issue is inconsistent collection and recycling services at ICI locations (offices, retails, warehouses, manufacturing facilities, schools etc.)
- BC has taken steps to reduce use of hard-to-recycle plastics and expand recycling services; there is still room for improvement.
- Packaging and plastics going to the landfill is causing double damage: loss of economic value and filling up the landfills (who have space for next 15 years only). Also, landfill CO<sub>2</sub> emission load is creating a negative environmental impact.
- There is a need to reduce the waste going to the landfills, recover and utilize the economic value of the waste to create a circular economy and create more jobs from efficient waste management services.
- **Current situation (Provincial/ Regional/Municipal efforts):** Provincial Single use and plastic waste prevention regulation (SUPWPR) is enacted to phase out hard-to-recycle single-use and plastic packaging (plastic cutlery and shopping bags). SUPWPR encourages reusable, recyclable, and compostable items.
- **BC has the strongest North American EPR program for PPP which processes 95% of the collected plastics within the province.** Also, there is DRS for beverages and Hazardous EPR program for Oil and solvents for paints.
- Moreover, there are various regional SWM plans that are submitted to the Ministry for preventing and managing waste including plans to reduce and manage waste within local jurisdictions and collection facilities. Few municipal governments have also used SWM by-laws to reduce hard-to-recycle plastic, bags, and take-out-containers.
- **Businesses and Institutions:** Actions include material sorting, promoting PPP recycling, setting reduction targets, corporate reporting on waste generated and switching to reusable food ware.
- There are data reporting gaps in the ICI sector (waste reported to waste sent to recycling) – CPP report on BC ICI sector.
- Some local governments, First Nations and small businesses have expressed desire for BC residential Blue Box to include the ICI sector as they currently face challenging handling ICI due to cost and administrative reasons.

### **Opportunities for ICI sector:**

- a. 1/3<sup>rd</sup> of the waste sent to landfills is comprised of PPP which is reusable and recyclable (like Blue Box materials). BC already has a strong recycling and processing footprint which can be tapped and extended (where feasible) to capture and process the ICI PPP waste to create circularity, reduce landfill load and create jobs.
- b. There is an increasing demand for the use of PCR in the supply chain both from government and corporate guidelines. ICI material presents an excellent opportunity for PCR if the right collection and recycling infrastructure exists.
- c. Proposed desired outcomes from management of ICI sectors includes the following:
  - Prevention-first approach
  - Consistency and confidence
  - Accountability and transparency
  - Access
  - Economic benefits of a strong circular economy
  - Maximize material recovery.

### **Discussion Questions:**

1. Are there any desired outcomes missing from the list?

**Reply:** The proposed desired outcomes mentioned above in c. give a strategic view, however, there could be an element added as **'Packaging design and Packaging weight reduction'** as a starting outcome. This will require the manufactures to

- i. Secure their packaging from mono-layer plastics instead of multi-layer plastics and.
  - ii. Reduce their Packaging weight (gms of the packaging they put in the marketplace)
2. What outcomes are most relevant to your business?

**Reply:** There is a need to understand and work throughout the value chain for this sector of waste. Starting from establishing a robust database or inventory which will ensure the correct mapping of materials from generation till the end point. For us, ensuring that collection and recycling of the ICI sector waste is secured with a gradual reduction of manufacturer's EPR costs would be the top priority.
3. How would you prioritize these outcomes?

**Reply:** Ensuring circularity in a cost-effective manner is the priority. A financially sustainable circular economy could only be created if,

- ✓ There is data reporting that is accurate and traceable throughout the value chain.
- ✓ The system collects clean and well sorted bales of confirmed volumes of the designated PPP materials year-on-year to supply to the processors.
- ✓ Processors establish recycling and pre-conditioning infrastructure that delivers efficient yield of materials (minimizing materials wastage) with process optimization.
- ✓ Recycled materials find attractive end markets to gain sufficient revenue that gets reinjected with the upstream players (collectors/ MRFs), thus moving the entire recycling

value chain towards an efficient and financially self-sustainable model eventually which will reduce the annual EPR cost burden on the packaging producers.

4. Are there indicators or measures of success you would suggest are used to determine if an outcome is achieved?

**Reply:** Two indicators:

- Ratios of tons of waste reduced, reused, and recycled with tons of waste generated (% wise)
- \$ spent/tons of waste managed (an important indicator for all the stakeholders – it will peak up in the starting year but with time it should go down)

5. Should non-residential packaging targets be the same, or better than residential packaging targets?  
**Reply:** To start off with, ICI targets should be the same to maintain consistency and avoid any confusion for the value chain stakeholders.

6. What type of targets would be most useful? Reduction, re-use, recycling, or diversion?  
**Reply:** manner of priority: Packaging waste weight reduction, source reduction then recycling targets.

7. Should there be regional or business specific targets in addition to provincial targets?  
**Reply:** Provincial targets for designated materials are sufficient to obtain the desired outcomes if followed in true letter and spirit. Extending it further business might cause confusion and unnecessary administrative burdens to organizations.

8. How can we measure success or progress against established targets?  
**Reply:** Through 'Performance reporting' as required by producers (delegated to PROs to report on organization's behalf).

11. What is already working to prevent packaging waste – for businesses and organizations?  
**Reply:** Currently big organizations hire third party collection companies to pick, sort and transport their site waste against collection agreements. It is working well.

12. Are there other actions that need consideration?  
**Reply:** while small companies face challenges in managing their ICI waste due to various cost and administrative reasons, there must be a thorough cost/benefit analysis needed for large organization to see what is more cost efficient to them i.e current practices of handling their ICI waste through hauler **OR** having their ICI waste reported and picked up through EPR programs.

13. How ready are organizations and businesses to implement?  
**Reply:** A similar program to create and manage ICI data inventory has been started in Quebec which requires ICI reporting in September 2025. So, our organization is getting prepared for it to report in 2025.

16. What are the benefits or limitations of expanded EPR options?

**Reply:** Still to be seen on the expansion side but curbside programs are working fine except for enormous cost of companies.

17. How ready are organizations, businesses, and governments to implement an expanded form of EPR?

**Reply:** With a reasonable lead time to report and implement the expanded EPR program, our organization would be ready to ensure that circularity of ICI materials is ensured at a reasonable cost (competitive with our current third part hauling and collection services).

18. How should implementation of EPR actions be prioritized (sector, material, or geography)?

**Reply:** Material wise – with full focus on the entire supply chain.

With that said, we would monitor the progress and look for more guidance from Government of Canada and provincial governments. Should you require further clarifications or have any queries, we remain at your disposal.

Sincerely,

Jawad Khan

Technical Regulatory and Packaging Circularity manager, Lactalis Canada

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Etobicoke Ontario M9  
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# Feedback for Clean BC's Preventing Waste in BC - Non-residential PPP Discussion Paper



**OCEAN  
LEGACY  
FOUNDATION**

Ocean Legacy Foundation  
Box 30082 Parkgate  
North Vancouver, BC V7H 2Y8  
Phone: (250) 538-2328



July 23, 2024

Government of British Columbia  
Submitted by e-mail to: [CircularCommunities@gov.bc.ca](mailto:CircularCommunities@gov.bc.ca)

## **RE: Feedback for Clean BC's Preventing Waste in BC – Non-residential PPP Discussion Paper**

The Ocean Legacy Foundation (OLF) appreciates the opportunity to provide feedback on this discussion paper as packaging and printed paper continue to be ubiquitous in the everyday lives of people in this province. Although this material is not washing up in great quantities on our shorelines as seen in other regions of the world, we still face the ever present reality of finding hundreds to thousands of littered pieces of printed paper and packaging along the shorelines of BC. Ocean Wise's<sup>1</sup> annual compilation of shoreline cleanup data from citizen science efforts highlight that plastics pieces, paper, food wrappers, bottle caps, plastic bags, coffee cups/lids, soft plastic packaging and plastic bottles are among the top twelve items being found on urban shoreline cleanups.

We are **very supportive** of regulations to address non-residential packaging and paper products. We believe it is imperative to start implementing systems to support waste reduction and diversion for the ICI sector while also working towards providing collection systems for people of this province while they are away and outside of their home. Litter throughout the province is all too common place once you start to look for it. This is one indicator that waste collection systems are required if commercial and industry sources are going to continue to provide paper and plastic packaging to consumers. We believe most people want to manage their waste responsibly, waste diversion bins should be mandatory alongside any garbage bin. Our current resource consumption system of linear-take-make-waste is adding unnecessarily to landfills at exceedingly high rates. Waste created within this system contributes to the creation of greenhouse gases that continue to threaten the environment and human health. In addition, the production of unnecessary paper and plastic packaging contributes to loss of habitat and biodiversity<sup>2</sup>.

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<sup>1</sup>"Ditching the Dirty Dozen", Ocean Wise, 2023, <https://ocean.org/blog/ditching-the-dirty-dozen-2023/>

<sup>2</sup>"Plastic Pollution is a Threat to Global Security", Ocean Legacy Foundation, October 9, 2022, <https://oceanlegacy.ca/plastic-pollution-is-a-threat-to-global-security/>



As a Canadian-based, international non-profit organization, initiated in 2013, OLF is dedicated to ending ocean plastic pollution around the world. Our mission is to develop and implement waste response programs that combat this critical challenge. Our vision is a world where oceans and lands thrive, free from the devastating impacts of plastic pollution. Our feedback is based on this ethos in combination with the goal of driving systemic change towards Zero Waste which, aims to conserve resources without burning and avoids waste discharge to the land, water and air.

Issues / Concerns	Potential Solutions
<p>The business of recycling, in particular when material is not covered under an EPR, is financially challenging and cost prohibitive.</p>	<p>Support and encourage the demand for incorporating recycled content into new products with strong regulation that requires the use of recycled content in the manufacturing of new products. This can in turn incentivize sound capital investment which drives the creation of recycling and waste management infrastructure as well as the costs associated with collection and processing. It's imperative to make recycling a viable business, especially for material types not currently covered under an EPR program but have the viability to be recycled if the collection and processing can be offset with the demand for sales of recycled plastic pellets. This action would allow the circular economy to thrive and is a key driver to create market demand.</p>
<p>Creating demand for recycled plastic pellets to support reuse systems and the circular economy.</p>	<p>By setting regulations or policy to incentivize the use of recycled plastic content in the creation of new products, there is opportunity to have the recycling stream connect and feed into the reuse realm. The creation of other financial incentives such as tax breaks or grants to</p>

	<p>subsidize start up costs could be created. This would help to ensure that the products that are being produced with recycled content can be applied into long lasting durable goods that adhere to the principles of circularity and be a potential step to enhance the downcycling which commonly occurs during conventional recycling practices. To further support the goal of upcycling, prioritizing the design of new materials and products to take full life-cycle analysis into consideration should be rewarded with economic growth benefits (ie. designed for reuse, item fits into a pre-existing EPR or can be returned to retailer for recycling) to help eliminate items that are destined for the landfill once they have completed their useful life.</p>
<p>Level the playing field for recycled plastic pellets / Create an equal market opportunity when using recycled content, such as plastic pellets.</p>	<p>Eliminate subsidies on virgin plastic to help support the circular economy.</p> <p>Explore completing a detailed cost analysis on the full life-cycle cost of products that use virgin content.</p>
<p>Lack of streetscape waste collection including diversion/recycling options.</p>	<p>Regional District Solid Waste Management Planning can be required to provide strategies to manage waste within high density/concentrated streetscape zones and within civic buildings. The Ministry should be highly discouraged from approving these Plans if they fail to acknowledged, in some capacity, streetscape waste collection in combination with recycling options. High traffic areas, parks, campgrounds, etc. would benefit from established waste collection systems in combination with</p>

	<p>recycling collection.</p> <p>Funding this initiative approach can be tackled in a variety of ways. With the inclusion of ICI PPP within an EPR could lend financial support similar to the collection system for residential PPP as one funding model.</p>
High volumes of PPP ending up in municipal solid waste.	Establish an EPR for ICI PPP to enable widespread accessibility for PPP recycling throughout the province.
Lack of recycling infrastructure in public spaces.	EPR for ICI PPP could lend support and address this concern. In addition, establishing new and fortifying existing collection and waste management infrastructure in public areas such as increased collection bins in strategic high traffic areas and increased public education can result in increased diversion and access to recycling.
Remote and rural areas have lack of access to ICI PPP recycling options.	Island communities and rural and remote regions outside the lower mainland and interior BC core catchment has little to no option for diverting ICI PPP materials. Many local governments with Recycle BC contracts that operate depots would like to expand and allow for the integration of the ICI sector to use these facilities but are currently restricted and unable to do so. Use of these established depot networks could allow for economical and efficient recycling collection. Small businesses can self-haul their material directly to a depot and avoid having to pay the cost for hauling services if a recycling depot network is available and accessible. In many regions throughout BC, paying for private hauling service of PPP recycling is not even an option. Allowing the ICI sector to use existing RBC depots for PPP

	collection would also lend support for streetscape, school, and business recycling as there would be readily available outlets to accept the material.
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**Where Efforts Should Be Prioritized:**

**Prevention-first approach** – OLF strongly supports the prioritization of the development of pollution preventative policy. Avoiding band-aid solution approaches and focusing directly on the desired outcome is of utmost importance. We must address and lower the rates of resource consumption with circularity and re-use systems. If this mentality becomes the predominate approach in practice, we feel the province will achieve much larger targets and goals faster, supporting the health of the people and planet. Replacing problematic plastic single-use items with other single-use items is not the answer as this allows for the continued use of resource exploitation and does not begin challenge and/or target the systemic behavioural changes needed in shifting our culture towards sustainability. Allowing for bandaid solutions, such as bioplastics and other single-use items, does not effectively address the core issue of reducing resource consumption and waste generation. We would like to support and contribute to the development of bold actions to address that address the plastic pollution crisis which we are experiencing on a global scale. BC is in a unique position to continue to make impacting leadership decisions and model a best practice framework that truly addresses waste reduction.

In conjunction with taking steps to eliminate unnecessary packaging and encourage redesign, PPP should have accessible recycling outlets throughout the province. In conjunction with the provincial priorities regarding zero waste and the current waste collection and processing capacity infrastructure that we know is possible within, it makes little sense that schools, civic buildings, businesses, organizations and offices, have little to no access to larger, coordinated systems to manage PPP recycling in the communities in which they are based. Whole regional districts are facing inaccessibility to ICI PPP recycling. Part of the prevention-first approach should be ensuring that throughout BC, there are outlets for ICI PPP. Acknowledging that Zero Waste is a lofty goal, we are unlikely to get there overnight and in the meantime, what cannot be reduced should be able to be diverted for recycling. Directing ICI PPP into the waste stream for regions who do not have private recycling collection options should be reason enough to warrant an amendment to the Recycling Regulation or to establish an ICI PPP EPR.

## Discussion Questions:

1. *Are there any desired outcomes missing from this list?*

Stronger regulation and policy to require a minimum amount of recycled plastic content in certain areas of new manufacturing (acknowledging there can be some toxicity concerns with plastic and recycled plastic use in food and drink ware). If recycled plastic is being used, this is not a caveat to allow for continued production of undesirable packaging. Design for the environment should be strongly emphasized and required. Distributing materials designed for the landfill should be taxed in such a way that there is a contribution being made to the regional landfill which then bears the final cost of this disposal.

2. *What outcomes are most relevant to your business, organization, or community?*

Prevention, access and consistency.

3. *How would you prioritize these outcomes?*

Our ranking of the outcomes from highest priority to lowest:

1. **Prevention** - eliminate un-necessary and poorly designed packaging (ie. multi-laminate, mixed materials such as paper and plastic, etc.) where possible.
2. **Access** – ensuring ICI PPP in rural and remote communities have access and low barriers to cost effective recycling.
3. **Consistency & Confidence** - that ICI PPP is a seamless system across the province, similar to the RBC PPP EPR to leverage educational outreach efforts and reduce confusion on what is accepted from one jurisdiction to the next. This will also instill confidence that what is added into the recycling system is actually being recycled.
4. **Economic Benefit** – Imperative that reuse efforts, using recycled content and the systems that support collection, processing, etc. are financially supported, viable and sustainable. Thriving recycled content markets are imperative to ensuring that the circular economy can succeed and circularity will become the basis of economic development.
5. **Accountability & Transparency** - ICI sector should be held to a baseline standard of responsible waste management and required to submit records to prove that some form of diversion is occurring. Opting for the lowest common denominator

of directing everything into the waste stream should not be an option if there is accessible and cost effective systems in place to support waste diversion.

6. **Maximize Material Recovery** - This should inherently be taking place if the above are prioritized.

*4. Are there indicators or measures of success you would suggest are used to determine if an outcome is achieved or is achievable?*

Continue to require regional districts to conduct regional waste audits and require ICI specific loads to be audited separately within these audits. Use these reports to measure success by continuing to evaluate how much ICI PPP is ending up in the waste stream in comparison to baseline metrics.

Performing randomized spot checks on the ICI sectors could provide indicators as to how successful these outcomes are interacting with the day to day business and operations of various entities within the ICI sector.

*5. Should non-residential packaging targets be the same, or better than existing residential packaging targets? Why or why not?*

Non-residential packaging targets should aim to be higher. Many ICI entities have procurement power within their business that can be controlled over what products come into their establishment. Incentivizing the use of procurement power which supports the purchase of greener options and the development of a Environmental, Government and Governance plan, can control incoming material volumes, waste composition and the entity's ability to increase waste management effectiveness.

*6. What types of targets would be most useful? Reduction targets; reuse targets; recycling targets; diversion targets?*

Reduction targets should be prioritized as this is a critical factor in waste reduction. The ICI sector should have established targets for each of these categories *reduction, reuse, recycling and diversion*, and not be limited to just meeting the baseline standard of recycling. Additionally, there is very little accountability or follow up for businesses once they have hired a third party recycler to ensure that their materials have been managed responsibly.

*7. Should there be regional or business specific targets in addition to provincial targets?*

*Why or why not?*

Yes, segregating the province regionally would be beneficial to show metrics for areas outside of the lower mainland. Due to the dense population of the lower mainland, often if a program is successfully collecting within this region, it can meet the 75% collection target while ignoring the rest of the province. Segregating the province into 3 or 4 regional sections (eg. lower mainland, coastal BC, interior, northern BC) would help provide a more accurate picture of what's going on in the rest of the province and where under serviced areas exist.

*8. How can we measure success or progress against established targets?*

Recycling rates, results from regional waste audits, spot check surveys/audits on various ICI sectors throughout the province to see what is visually being offered in terms of reduction, reuse, recycling and diversion options, have local governments report back annually on what services they are providing in civic buildings they own, operate or manage in terms of reduction, reuse, recycling and diversion. Although this reporting may present additional administrative burden and cost, standardizing data collection across regional districts and what data landfill sites collect will be imperative to filling the significant waste management data gaps that exist right now across the province.

*9. What actions are best suited at the local, regional, or provincial level of government?*

Provincial level – specific materials/products to ban, waste hauler licensing and annual reporting, clear garbage bag mandates, waste minimization plans for large corporations/industry and setting targets/goals.

Regional/local level – waste disposal bans (that should be encouraged by the province and have targets for regional governments to aspire to) and ability to make bylaws.

*10. What factors should be taken into consideration if the Province enables or promotes local actions?*

Establishment of a database and annual report that outlines each jurisdiction and what local actions are in place to enable various regions around the province with the ability to quickly get a pulse check on what's happening where. In addition, a current list and/or inventory of bylaws and bans that support these local actions would assist smaller or over capacity local governments to catch up and implement similar initiatives

if they do not have the time or expertise to spearhead these initiatives on their own. Acknowledging that it takes significant time and energy to invoke local actions, the more the province can do and take on with a province-wide approach, will save much time and effort and will not leave smaller, rural communities behind.

The more we can do on a province-wide level, a more consistent framework can be developed to help guide the public and industry. Actions taken jurisdiction by jurisdiction are hard to communicate to tourists, seasonal workers and temporary community members. This methodology can often leave a patchwork of conflicting or inconsistent policy from jurisdiction to jurisdiction and many have found this to be confusing and/or hard to follow. A system-wide approach will have greater outcomes. Ex. A plastic bag ban in the City of Victoria will not have the same impact as a plastic bag ban throughout the entire Province of BC. This larger strategic approach can start to make an impact for producers, manufacturers and distributors.

*11. What is already working to prevent packaging waste – for businesses, institutions, haulers, local governments?*

Big box stores seem to have some robust in-house recycling systems established. Some local governments have RBC depots set up to accept ICI PPP and are currently at risk of losing this option even though they've been paying per tonne for the processing of the ICI material.

Product bans and disposal bans are having an impact and should be expanded upon.

*12. Are there other actions that should be considered? What are they?*

- Establishment of an ICI PPP EPR.
- Added tax or levies should be downloaded onto producers, manufacturers and distributors of problematic, non-recyclable packaging material.
- If curbside collection service of garbage is available, it should be mandated that this service needs to be carried out in combination with curbside recycling and organics if there is access to a processing facility. There should be no option to provide single stream curbside collection of waste only.
- BC should move to a clear garbage bag system to aid in compliance enforcement efforts.



- Outreach and educational efforts should be clearly outlined within regional solid waste management plans. Additional efforts by the province to produce province-wide campaigns would be beneficial.

13. *What are the benefits or limitations of these waste prevention options?*

Without the establishment of a new ICI PPP EPR, for many regions, if these policies are enacted, there is no outlet for ICI PPP recycling. Unless the ICI sector moves towards 100% reusable, they won't be able to abide by these policy changes that seek to address ICI PPP ending up in the waste stream.

14. *How ready are organizations, businesses, governments to implement?*

The majority would likely be adaptable to engaging in an ICI PPP EPR program.

15. *How should implementation be prioritized?*

We recommend following a similar approach aligned with our EPIC strategy; Education, Policy, Infrastructure and Cleanup. Building out a robust education and awareness plan will be critical to ensuring people know about the pertinent issues surrounding ICI PPP and what solutions the province will be implementing in collaboration across sectors with relevant stakeholders. Determining what policies to develop and a reasonable time frame for implementation will need to be prioritized. This plan can be constructed while the province is engaging in education activities. During education, take detailed notes of the points in your education that are most useful or where you notice the most gaps in knowledge. This will be key in how to effectively communicate your policy. While education and policy are rolling out, efforts around infrastructure and circular market development need to take place.

Ensuring there is ample access to recycling options and helping to financially fund the conversion towards reusables will be important while policy continues to guide and refine allowable items for manufacturing. Mechanisms such as tax incentives could be offered to the ICI sector to encourage efforts towards reduction and reuse systems. Establishing incentives that facilitate incorporating recycled content into those reusable products as well as in the PPP that meets the principles of circularity, ie. Simplifying packaging to single resins, using resins with highest capacity to get recycled (PVC versus polypropylene, phasing out laminates, products have a full life cycle analysis performed with an end-of-life management plan in place, etc).

Continuing funding and supporting cleanup efforts across the province should also be prioritized. Cleanups are a critical activity that reduce the generation of microplastics and remove harmful waste materials that pose serious risk to wildlife, the environment, create navigational hazards and costly property damage.

It is cheaper to prevent pollution from occurring than it is to clean up after the fact, however, cleanups are an integral component until we collectively achieve the goal of Zero Waste and they are no longer needed. The province must continue its CleanBC program which provides fiscal resources through the Plastic Action Fund and the Clean Coast Clean Waters program and should continue to be scaled. For effective implementation, the province will need to consider having many actions occur simultaneously while solving management issues related to the waste generated within the ICI sectors. Often, one aspect involved in ICI waste management cannot occur successfully without the success of another and many considerations must be integrated into a holistic strategy for success. Finding local champions to help lead your strategy across the province will be key to its long term success, community buy-in and implementation.

There is a need to ensure smaller communities get service from EPR programs and not require that local governments subsidize their services.

*16. What are the benefits or limitations of expanded EPR options?*

Expanded EPR options increase accessibility and can allow for economies of scale in waste diversion centres or depots that are already established that can be utilized for the collection of new materials from a new/expanded EPR program. Expanding the number of EPR programs at waste management centres generally increases diversion when residents/ICI sector can go to one facility to have all their recycling needs addressed, eg. 'One stop drop'.

*17. How ready are organizations, businesses, and governments to implement an expanded form of EPR?*

In consultation efforts that we have done within the marine industry, there was interest and openness in exploring this waste management model. We found there to be a lot of questions, hence the need for education but there was also a strong acknowledgment that new solutions were urgently needed to help solve the industrial waste leakage issues within communities across BC.

The majority is likely ready for an ICI PPP EPR. Many regions are witnessing businesses, restaurants, schools and offices 'illegally recycling' by using residential Recycle BC depots. It seems many are chomping at the bit, waiting for the inclusion of ICI PPP at residential PPP depots.

18. *Are there sectors or materials that should be prioritized to be included or excluded?*

Schools, restaurants, businesses, offices and large community centres such as stadiums should be among the first addressed and included.

19. *How should implementation of EPR actions be prioritized (e.g. by sector, by material, by geographic location)?*

Implementation should be prioritized as one. If change can happen as one unified launch rather than a trickled in approach, we feel this would have a greater outcome. For franchises and business to business relations and interactions that happen across the province, having a phased approach that only addresses some material, some sectors or some parts of the province will likely be seen as confusing. Invoking a unified, province-wide approach of a full program launch will save on marketing and outreach efforts as everyone will be affected together, at the same time and will avoid the dragging on of a phased approach where regions, communities, sectors and materials will undoubtedly feel left behind. From our understanding, EPRs have launched province-wide historically. This allows for local governments, collectors and affected sectors to solicit input for best practice approaches to meet the change together, sharing resources, and strategic approaches.



Department: Solid Waste & Recycling

## Feedback for Preventing Waste in British Columbia: Non-Residential Packaging & Paper Products Discussion Paper

### 1. Are there any desired outcomes missing from this list?

An additional outcome should be preventing packaging going to landfill, waste to energy, cement kilns, pulp mills or any other form of destruction or disposal.

In addition, to small communities needing access to manage non-residential packaging and printed paper, measures that drive collection/service in areas outside of large urban areas are also important. Service should be paid for by producers and not require subsidies from local governments.

### 2. What outcomes are most relevant to your business, organization, or community?

All of these outcomes are very important. However, we think cost effective access in all rural locations within the TNRD is a primary concern. Businesses in small communities tend to struggle to recycle given the limited volumes being produced resulting in higher costs and less accessibility.

### 3. How would you prioritize these outcomes?

1. Prevention First
2. Consistency & Confidence
3. Access
4. Accountability & Transparency
5. Maximize Material Recovery
6. Economic Benefits for a strong circular economy

### 4. Are there indicators or measures of success you would suggest are used to determine if an outcome is achieved or is achievable?

The indicators of success that we would use include:

- **Prevention First** – non-residential entities and MRFs track and report ways they are processing materials (#, types, changes or improvements), waste generation levels with the goal of reduction, how reuse is being prioritized, and what is going to landfill to ensure businesses are making strides to prevent waste.

Also, would like to see reduction in virgin packaging.

- **Consistency & Confidence** – Obtaining baseline data for volumes of this inbound material vs. inbound volumes after steps towards this outcome have been undertaken.

To establish confidence in these recycling options being made available, we feel a

MUNICIPALITIES: Ashcroft | Barriere | Cache Creek | Chase | Clearwater | Clinton  
Kamloops | Logan Lake | Lytton | Merritt | Sun Peaks

ELECTORAL AREAS: "A" "B" "E" "I" "J" "L" "M" "N" "O" "P"

stewardship organization to facilitate consistency between all programs in the province is one of the only logical steps. Hard to determine how this consistency will be regulated if there is not one overarching body setting & determining consistency in reuse and recycling options. Alternatively, could be a registry similar to the Plastics Registry.

- **Accountability & Transparency** – With ambitious targets being set businesses will have to engage in comprehensive data reporting and perhaps Waste Prevention/Management plans as apart of receiving a business licence. Could start as voluntary and then become mandatory.
- **Access** – cost effectiveness will have to be defined. This will look different in different communities, and it will likely be most expensive in the smallest most isolated communities. Identify Indigenous Nations to increase waste prevention & recycling options in and work from there. Important to address what these options will look like.
- **Economic Benefits for a strong circular economy** – Measure reuse, virgin material content, job creation (processing, hauling), equitable system connectivity.
- **Maximize Material Recovery** – Similar model to Plastics Registry data on applicable non-residential PPP (generated, collected, diverted, disposed). Also track degree of recycled content.

**5. Should non-residential packaging targets be the same, or better than existing residential packaging targets? Why or why not?**

Non-residential PPP should have higher goals than residential targets as they are quite low. A sliding scale could be a good approach, starting at the same target as residential packaging however implementing a phased approach that steps up quarterly/annually to give businesses/industry time to adjust and get their infrastructure and receiving capacity to a place to be able to process this influx in material. From here targets could ramp up higher than existing residential packaging targets as industry & businesses generate such large volumes of material that could be recycled. Penalties could be applied to producers for failure to comply (which are set higher than the cost of complying). There needs to be a strong focus on enforcement and having more control with ICI. It would be interesting to know the volumes being generated as targets should correspond to the size of the packaging/waste pollution issue.

**6. What types of targets would be most useful? Reduction targets; reuse targets; recycling targets; diversion targets?**

When focus is placed on downstream targets, such as recycling, it can limit the steps that are taken in the first place to first reduce the amount of waste being generated. For that reason, we feel reuse and reduction targets are very important to actually limiting the amount of waste.

Overall reuse targets would create a clear intention and result in confidence & stability in market investments & infrastructure. This would encourage a shift in markets to support strong circular economic principles.

Reduction targets from non-residential generators quantified by both the weight and the number of packaging units would encourage a true reduction as opposed to switching to lighter materials that may have a greater environmental impact.

## **7. Should there be regional or business specific targets in addition to provincial targets? Why or why not?**

There should be sector (business) specific targets as well as regional targets that ensure action is being undertaken in rural locations, municipalities, and first nations communities. Having overarching targets at the regional scale could encourage a greater market shift improving reuse, reduction, and recycling as a whole. New targets could be added as infrastructure and system connectivity improves.

For initial business specific targets, we think it would have to dependant on the type of material being recycled. Containers & Fibre packaging and metal recycling programs are established in some areas, whereas flexible plastics and hard to manage materials may be harder to first implement. In that case, EPR would be beneficial to prevent high costs in rural locations better supporting compliance. It also may be beneficial to implement “a list of plastic packaging that is to be designated as problematic or unnecessary” in the commercial sector, similar to what the Canadian Plastic Pact has done for their 2025 goals, as these problematics could be replaced by easier to recycle materials

## **8. How can we measure success or progress against established targets**

Success could be measured both qualitatively and quantitatively. MOE could start with initial data retrieval of non-residential generators to establish accurate data (regarding total waste disposed) and then make the data publicly available for transparency.

The province should license all haulers and require data reporting by material type, customer type and any materials that cross regional or provincial borders. From a producer perspective, the federal plastics registry will cover one material but the province could also consider tracking the other materials to have a more complete picture and understand shifts in the material flows and types.

In addition, looking at improvements in infrastructure and market connectivity, especially in rural communities and regions will help determine if targets are successful at supporting circular economic principles and market stability.

## **9. What actions are best suited at the local, regional, or provincial level of government?**

- Local – Disposal Ban, Source separation at facilities
- Regional – Disposal Bans, RSWMP, Source separation at facilities
- Provincial – Disposal Bans, Expanding EPR, Overarching Reuse & Reduction Requirements, Waste hauler mandatory reporting (with data anonymized but made public for all province, by municipality, First Nation community and RD), Clear Bag requirement to support disposal bans, solid waste reduction plans as part of business licensing (including provisions to fill in gaps for areas where regional districts may not license businesses).

## **10. What factors should be taken into consideration if the province enables or promotes local actions?**

The size of communities/economies, geographic location with respect to system connectivity, specific sectors operating in a particular municipality/area. Also important to consider what may cross boundaries of local/regional governments as it may be better implemented at a provincial level such as data requirements.

**11. What is already working to prevent packaging waste – for businesses, institutions, haulers, local governments?**

EPR for Residential PPP is working well.

In addition, the TNRD's solution has been to implement Disposal Bans for Cardboard and other Recyclables under the Recycling Regulation. To provide reasonable access the TNRD accepts OCC and commercial containers at a cost (\$90/t) from ICI customers to help cover trucking and receiving costs. This is the same rate at which we accept refuse. From here the TNRD has materials trucked to Emterra Env., Cascades, & Gold Trail for processing

**12. Are there other actions that should be considered? What are they?**

Yes, EPR for ICI PPP.

In addition, clear bag mandates could be an effective strategy to support recycling programs. If disposal bans are being implemented a clear bag mandate would help identify materials hidden in garbage bags.

A comprehensive provincial education and communications system for the non-residential sector would be immensely helpful in giving industry the tools to reach potential targets.

**13. What are the benefits or limitations of these waste prevention options?**

It is important that all of these actions are taken, and not addressed in a siloed manner as EPR is not meant to be a stand-alone solution but part of a suite of policy that drives design and production in the right direction, helping to internalize many of the costs currently externalized today (CCME Canada-wide Action Plan for EPR). Together, it seems that these approaches could effectively tackle the problem of non-residential PPP from a variety of different target points. From trying to remove problematic recyclables, implementing disposal bans, encouraging reuse, data tracking and management to EPR considerations we feel these targets are great first pieces of the puzzle to get into place.

It may take some time to get these options in place and with so many individuals businesses it will be hard to monitor due to the huge number private businesses unless a concrete plan and tracking system is made.

**14. How ready are organizations, businesses, governments to implement?**

It is hard to speak outside of a TNRD perspective however, as we already have some of these targets in place (some disposal bans & provincial data sharing) we are very open and want improved solutions to the ICI PPP challenges facing our region. With our new RSWMP planning going to being undertaken in 2016, we could look to see how these targets could be added. Now days individuals & organizations want to do better when it comes to reducing their environmental impact so I think if the "why" is strong enough for businesses they will hopefully get on board. It may be beneficial to phase in.

**15. How should implementation be prioritized?**

It may be best to consider starting with standardized waste prevention and management actions for businesses/institutions and Provincial data collection, standardization, and sharing to build a strong baseline. From there building a toolkit that lists of designated non-residential PPP recyclables,

problematic materials, and supporting actions, etc. could be a great next step as it will support subsequent actions being considered like disposal bans and reuse requirements.

Once groundwork is complete, focusing on system connectivity is important to ensure small businesses see the EPR regulation as a benefit that will save time and money. There is a need to ensure smaller communities get service from EPR programs and not require local governments subsidize services.

Reuse requirements dependant upon sector are also an easy step to eliminate waste upfront and reduce the volumes of non-residential PPP to be managed. Disposal bans could be a great initial supporting action to encourage diversion and compliance. However, enforcement capacity could be a limiting factor, especially in rural areas.

#### **16. What are the benefits or limitations of expanded EPR options?**

The benefits include a well-defined system that is proven to work expanding to collect more materials. This would strengthen existing EPR by demonstrating a growing, reliable market for these already divertible/recyclable materials. It would also encourage businesses to recycle more as the costs would be carried by the producers, not each small business and public institution.

It is also important to ensure the best system is being employed to prevent competition/non-competition issues such as disappearance of some well-qualified small businesses, lack of service in some areas, not adequately compensating local government service providers, challenges with access to markets for non-participators, lack of competition among service providers.

#### **17. How ready are organizations, businesses, and governments to implement an expanded form of EPR?**

In September 2019, the TNRD and other Regional Districts in the B.C. wrote a letter to the MOE requesting that non-residential Recycling be added to the Recycling Regulation demonstrating a longstanding desire of regional districts to have an expanded form of EPR. For many businesses, there are limitations to recycling access, and it can be frustrating when it is the same material as another EPR program but because they bring it in, it cannot go in with any Recycle BC categories. We could imagine increasing acceptance of these materials would garner a high degree of support of those who are ready to implement. However not all are and so an additional widespread education campaign to ensure businesses, institutions, and local governments understand their roles (as an end user or as a producer) would help readiness.

#### **18. Are there sectors or materials that should prioritized to be included or excluded?**

ICI locations such as schools would be great places to start as these materials have the most similarities to PPP products accepted by Recycle BC. We have already seen that there are systems in place to manage this material. No sectors should be excluded, but if some pose particular challenges those could be phased in later to try and capture the bulk of non-residential PPP as quickly as possible.

#### **19. How should implementation of EPR actions be prioritized (e.g. by sector, by material, by geographic location)?**

EPR should be prioritized by material type first. Materials that already have already demonstrated a proven ability to be received as an EPR material should be first and expanded from there. Having ICI



Containers, fibre, glass, plastic packaging and styrofoam material types (similar to RecycleBC's model) makes the most sense because much of this material is already being collected successfully. From there, implementing Agricultural PPP such as Clean Farms would be the next area of focus for the TNRD as our RSWMP requires us to look for solutions for this sector. Business to business wood waste (reuse of pallets) would also be an area that could be achieved quickly as many municipalities and regional districts already offer wood waste diversion options.

## **20. Other issues identified**

- Some costs have shifted but there is still a significant subsidy from local governments for facility costs and services
- EPR cannot solely focus on a collection rate, it needs to support full access to services and prioritize PPP redesign and R&D, reuse, and then actual recycling (not just collection).
- Some ICI businesses are already paying for system when they buy products intended for residential market
- Need for eco-modulated non-visible fees
- The Recycling Regulation needs an update to require programs and measurement for the upper part of hierarchy

Thank you kindly for the opportunity to provide feedback.

With Gratitude,

Emily Branch  
Env. Services Coordinator  
Thompson-Nicola Regional District

Response to discussion paper:

*Preventing Waste in British Columbia: Non-Residential  
Packaging & Paper Products*

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## Introduction

As per the discussion paper released for reference ([Source](#)), BC is looking for circular solutions to reduce non-residential packaging waste. Circularity is achieved through both upstream and downstream solutions, so it is critical to include both, cohesively and strategically, in planning.

## Upstream

### *Regulation of packaging materials*

We see this in almost every industry - Businesses are financially incentivized to use unfriendly materials or unfriendly processes, because they are often cheaper within the marketplace. This needs to change, and can only do so with governmental support.

1. Acquire feedback to utilize materials that are recoverable by municipalities
2. Funding to make the switch easier for small business and / or municipalities.
  - a. Subsidies for “friendly” materials, or taxation of “unfriendly” materials. Or both.
  - b. For example:
    - i. C&D:
      1. Plastic ties to bundle lumber



- a. These are not recyclable or reusable.
- b. Alternatives:
  - i. Recycled paper

- ii. Hemp
  - iii. Metal
- 2. Plastic to bundle shingles, piping, etc.
  - a. These are not recyclable or reusable.
  - b. Alternatives:
    - i. Recycled paper
- 3. Plastic shims
  - a. These are recyclable and sometimes reusable, however oversight to ensure this is often lacking on construction sites.
  - b. Alternatives:
    - i. Waste wood
      - 1. Shims would then be included in resource recovery requirements for clean wood.
- ii. Cosmetics:
  - 1. Some cosmetics are not even fastened closed for sanitization, while others are plastic wrapped, or taped, or are plastic with paper backing.
    - a. Having consistency would allow manufacturers and resource recovery professionals to work together more effectively.
- iii. Cosmetics, cleaners, mechanical products, construction products:
  - 1. Consider: We are asking people to prepare materials for recycling in fast-paced, high pressure work environments. We need to make this as easy as possible.
    - a. Ie. Squeeze tubes are difficult to recycle because they are difficult to clean - Bottles or similar canisters are feasible for many of these substances, and are easier to recover at end-of-life.
- iv. General:
  - 1. Styrofoam packing peanuts used in shipping
    - a. Alternatives:
      - i. Corn starch packing peanuts
        - 1. Corn starch packing peanuts are both dissolvable in water (they can be rinsed down sinks or drains) and compostable, making disposal extremely easy.



- v. Reusable bags are still allowed to be plastic.
  1. This is counter-productive to the intent of banning single-use plastic bags.
  2. If you're going to ban plastic bags, you must also ban reusable bags made from non-recoverable materials.

### *Collaborate with Housing Ministries to reduce construction waste*

1. Building Code currently does not address construction or demolition waste. It should be a requirement of build planning, to also plan for waste diversion in construction and at the building's end of life.
  - a. Example: [CCR 2102](#)
  - b. This should include:
    - i. Designing buildings for future relocation and / or deconstruction
    - ii. Education encouraging demolition alternatives
    - iii. Examples of municipal bylaws which prioritize and / or incentivize demolition alternatives.

### *Increased import costs on luxury products, especially those with a bad track record of reuse*

1. Manufacturing accounts for a huge amount of global emissions. Manufacturing of truly unnecessary products should be discouraged.
2. Global manufacturing creates packaging waste throughout a product's distribution.
3. Local manufacturing, where Canada can hold production and packaging to their own standards, should be rewarded.

As an example: Luxury brand sneakers.

A pair of sneakers contains roughly 13kg of CO2 emissions. 90 per cent of sneakers are sent to landfill when no longer in use, or when not sold. ([Source](#))

Luxury shoe brand Jordan's increased revenue by 1400% leading up to 2022. In 2023 they made over 6.6 billion in total revenue. Compared to its revenue in the 2016 fiscal year, which tallied \$2.8 billion, the Jordans brand has grown by over 135%. ([Source](#)) In 2021, eight of the 10 top-selling sneakers in Canada were Jordans brand. ([Source](#)) These sneakers are manufactured in China. In Europe, Nike (owner of Jordans brand) takes responsibility for collecting, reusing and

recycling old or unsold sneakers. Donation / recovery centres for sneakers through Nike are not active in Canada, however non-profits are working to fill the gap. ([Source](#) and [source](#))

### *Studies on single use packaging vs food waste in restaurants*

In 2022, the planet generated 1.05 billion tons of food waste. This includes inedible parts, like packaging. Around 60% of this is individual responsibility, and 28% is on the burden of the service industry. ([Source](#))

Is the food waste reduced via single-serving packaged products like butters, jams and cream outweighed by the plastic waste production?

Note: If sauces like gravies can be served to order hygienically, so can condiments.



## Downstream

### *Regulation of warranty requirements*

1. Warranties on products should be required for at least 5 years.
  - a. For example: Phones and computers, power tools.
  - b. This would limit the current trend of generating revenue by designing products to break down in a year or 2, so that people need to repurchase more often.
  - c. Local repair centers should be required of corporations of a certain size. If they want to sell here, then they must also offer maintenance here.
    - i. Some people will throw a product out rather than pay for shipping, or wait months for the product to be returned from abroad..
    - ii. Dewalt and Snap On set a good example of this.

## Acknowledgements

Thank you for this opportunity to provide feedback!

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## **Feedback to Discussion Paper: Preventing waste in British Columbia: Non-Residential Packaging and Paper Products**

Nanaimo Recycling Exchange Society (NRES) first operated as a recycling depot, and more recently as a non-profit society promoting the Conserver Society conceived in the 1970's by the Science Council of Canada.

In recent years, NRES has worked extensively with the ICI sector to a) understand their needs and knowledge of waste, and to b) as a first step, align ICI practices with our regional waste diversion targets, and most importantly to c) encourage prevention strategies of Reduce and Reuse to discourage dependence on failing or dwindling ICI recycling programs and services.

In-depth project work with the Construction, Agricultural, Multi-family, Reuse (Thrift outlets), Fast Food, and Child Care sectors was completed for the purpose of developing Best Practice models of waste prevention. From this project work, NRES offers reports and primers with data, insights, and solutions for the ICI sector to MOECCS. Please contact me by email if there is interest in reading these reports and primers.

For this Discussion Paper, NRES offers significant experience and knowledge of ICI challenges, barriers, and potential for waste prevention. This is by no means a polished document, but I hope the points made are clear enough.

### **General Approach to Waste Prevention**

I have concerns about certain premises in this Discussion Paper.

Waste prevention is an important goal as described in this paper. Waste prevention can be achieved by adopting and correctly using the Pollution Prevention Hierarchy (PPH) as it was designed to be used. It was not designed for waste management. The hierarchy is a waste prevention tool, and cannot achieve prevention when applied to waste management.

Waste that already exists cannot be reversed, and waste that already exists cannot be reduced. Waste that exists cannot be prevented. The Law of Conservation of Matter takes care of that.

The waste management industry incorrectly applies the Pollution Prevention Hierarchy to waste management. This is a corrupted use of the hierarchy, and of the principles of prevention.

Waste management is an industry, not a strategy. Waste diversion does not achieve waste prevention. Diversion from landfill cannot reduce waste. Most diverted waste just goes missing.

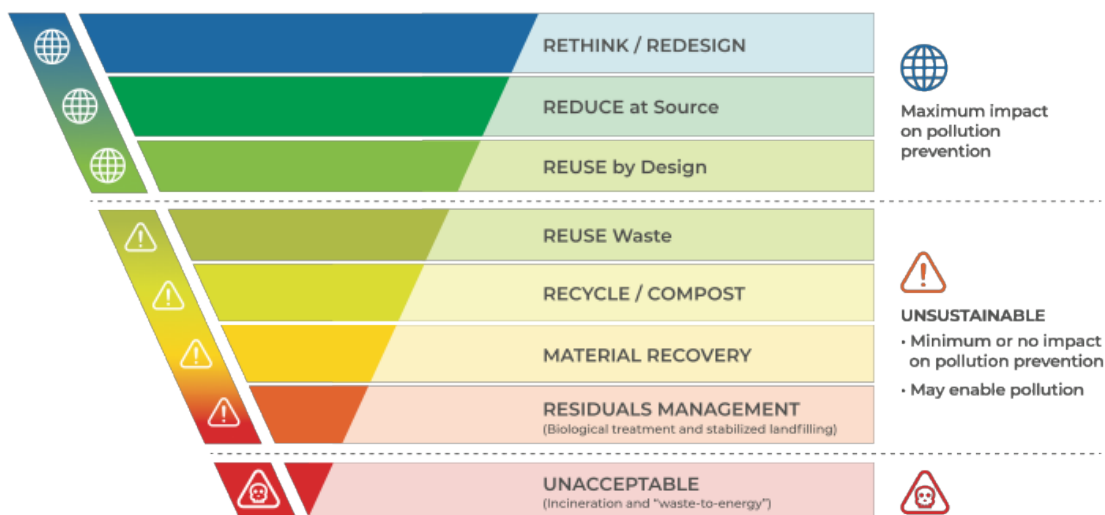
Do not go where the path may lead - go instead where there is no path and leave a trail.

Waste management practices provide no templates for waste prevention. Waste management industry jargon should not be adopted for government policy.

The Pollution Prevention Hierarchy is a true tool of prevention that, by definition, must be applied in planning stages and it must be monitored and enforced by government. Now is the time to implement correct use of the hierarchy as ICI waste is under examination.

NRES Pollution Prevention Hierarchy includes notes and detail to explain correct use.

NANAIMO RECYCLING  
exCHANGE  
SOCIETY **Pollution Prevention Hierarchy**



RECYCLE: product is at end of life (not end of use) | MATERIAL RECOVERY: any recoverable materials from product at end of life (not end of use)

[www.recycling.bc.ca](http://www.recycling.bc.ca)

**Some faulty conclusions in Discussion Paper**

**“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.”**



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Recycling does not reduce waste. Reuse of waste cannot reduce waste. Driving waste around and or finding some use for it, or something to make from it is not waste reduction. It is most certainly not waste prevention. None of these tactics can prevent waste. Only Reduce at Source and Reuse by Design can prevent waste.

**“British Columbia has taken actions to prevent plastic waste, including expanding B.C.’s reuse services and recycling programs.”**

Expanding BC’s recycling and reuse programs cannot prevent waste.

**“There are also examples of B.C. businesses and institutions taking steps to prevent plastic and packaging waste. Actions include material sorting to keep recyclables from entering landfills, promoting plastic and packaging recycling ... reporting on plastic and waste generation... , or preventing packaging by switching to reusable food service ware.”**

Recycling cannot prevent plastic waste.

√ Only switching to reusable can prevent waste. This is correct and important.

EPR for ICI seems suggested as a foregone conclusion, yet there is no rationale in the Discussion Paper for implementing EPR for ICI packaging waste prevention. This is not surprising, as the data doesn’t exist. It is no secret that, after some 30 years of practice, EPR has not yet affected product design in efforts to reduce or prevent waste. There is no data in RecycleBC Annual Reports to suggest EPR achieves anything but collect and deliver masses of waste PPP.

If BC EPR programs were successful in preventing waste, I would not expect our per capita waste disposal to have increased from 473 kg/person/year to 506 kg/person/year since 2016. Yet it has. This number is low as waste diverted to reuse or recycling is not part of calculation even though the recycling process has a 20% disposal rate. Dismal collection rates for plastics do not seem to improve. “Processed” is reported as an end fate but means nothing.

If EPR is to be implemented, MOECCS must enforce Recycling Regulation use of the PPH.

**“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”**

Reuse and recycle does not reduce waste: it uses more resources. There is nothing to be gained from dreaming up frivolous (re)uses for plastic waste, recycled or not.

**“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. 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.”**

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### **There are two problems with the Circular Economy concept that includes recycling: Circular and Economy**

Recycling is not circular. There is no viable economy for recycling or recycled content. Recycled products can never match virgin for price or quality. Recycled products will never be what they once were and so do nothing to curb virgin product. There won't be a circular economy for plastic. Virgin is too cheap.

Only Reuse can be circular.

**“Stopping waste before it starts”** Yes. This is the key. The only way to reduce waste is to not make it in the first place. This should be getting through by now as the only solution.

### **Discussion Questions**

#### **Desired Outcomes**

##### **1. Are there any desired outcomes missing from this list?**

Actual evidence-based strategy is missing. What is currently believed to be working is not working. For example, per capita disposal in BC has risen from 473 kg/person/year in 2016 to 506 kg/person/year in 2021. This means what is believed to be working, is not working.

Retrieved from: <https://www.env.gov.bc.ca/soe/indicators/sustainability/municipal-solid-waste.html#:~:text=In%202021%2C%20British%20Columbians%20disposed,473%20kg%2Fperson%20in%202016.>

BC is supposed to be the shining star, but the evidence does not back up the rhetoric, mostly generated by EPR and local government that depends on the cost savings (and revenue) from EPR. Outcomes based on failed strategy cannot be different from more failure.

Evidence based environmental outcomes are missing from the outcomes. To date, economic benefits have only further enabled excessive waste. Examples: EPR funds have created a false economy and perception of recycling plastic that isn't even recycling: it's processing and exporting.

##### **2. What outcomes are most relevant to your business, organization, or community?**

1. Environmental outcomes achieved by prevention strategies of
  - a. Reduce at Source: this conserves resources and prevents waste. For example, in construction, Reduce means cut fewer trees, make less cement and steel, and build smaller homes. Reduce cannot be applied to waste that already exists. Failure to incorporate Reduce at Source has resulted in decades of record consumption and waste.
  - b. Reuse by Design: means reuse of a product, within a system, designed by the manufacturer and brand, for the life cycle of the product. Reuse is NOT defined by finding some subsequent use for wasted products or materials.

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2. Rejection of Waste Management as any kind of solution. Waste Management is an industry, not a strategy. The principles of the Pollution Prevention Hierarchy cannot be applied to waste. Diversion from landfill, for example, does nothing more than prevent regulated

landfills from getting full. Waste diverted to private land, or to recycling or to energy from waste does not reduce waste. It simply goes missing. For example:

- a. In 2013, CRD waste to landfills in Canada reached 10.9M tonnes. Diversion from landfill kicked into action. Today, 4M tonnes of CRD waste is sent to landfills each year. Overall waste increases each year. Where did the rest go? No one knows.
- b. By 2019, Canadian Council of Ministers of the Environment was calling for data about CRD diversion practices, systems, definitions, costs, funding mechanisms, disposal, markets, and “fly-by-night” recycling operations. Why? Because no one knew what was happening with the diverted materials. There was “no set standard for establishing CRD waste policy goals.” From: ECCC  
<https://www.canada.ca/en/environment-climate-change/services/managing-reducing-waste/municipal-solid/reducing.html#Wastehierarchy>

### 3. How would you prioritize these outcomes?

First, Prevention, as the discussion paper states. But prevention must be prioritized as presented in the Pollution Prevention Hierarchy. This means that only ReThink, Reduce at Source, and Reuse by Design are sustainable strategies. All other options, including recycling, should be considered unsustainable. Recycling simply delays disposal, and so has no preventive value. Recycling does not reduce virgin production and therefore does not conserve resources (except in some cases of recycled metal that displaces virgin metal). Recycled plastic and paper mostly have extraneous and frivolous uses invented because of supply, which today continues to far outstrip demand. Design for recyclability is planned obsolescence.

Second, Accountability and Transparency of all outcomes. Meaningful tracking and outcome data (from market, through to end fate) must be collected and made public. The bubble of belief that waste can be managed, reduced, and kept out of the environment must be burst.

Consistency and Confidence are necessary: Pollution Prevention must be implemented across all levels of government, and into every day life in BC. But the description of consistency and confidence provided on p. 17 is based on faulty conclusions about waste. Reuse or recycling of waste can not ever support or incentivize prevention. There is no waste management technology that can prevent waste. It's too late. This is a corrupted use of the Pollution Prevention Hierarchy and principles.

None of the other Desired Outcomes is useful.

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Access to waste management will do nothing to prevent waste. In fact, if waste is prevented, access to waste management strategy will hardly be needed.

The Circular Economy model is deeply flawed inasmuch as it depends on any technology beyond ReThink, Reduce at Source, and Reuse by Design. As we all know by now, Recycling is neither circular nor economically viable, which is kind of important for a circular economy.

No recycled product will be what it once was. Recycling adds but a trickle of recycled content into any circular system. If you like numbers, please read the following example of recycled content contribution to virgin production.

**Example:** The only way recycling becomes circular is if recycled material can be made back into the original product that then replaces primary production by 100% from now to infinity. We all know that's not possible. The best-case scenario for recycling being made into the original product is 80% of 0 to 100% of product collected (20% is normal loss to recycling process) and recycled with 100% recycled content (most recycled content hovers around 10%). Then that has to replace primary production at 100%. It doesn't exist or add up.

Starting with 10 units of waste, at 50% collection (a high overall average), and 80% recycled, 4 of 10 will be recycled and will replace 10% of new production (using today's standard of 90% virgin/10% recycled content), 6 units will be disposed/lost and 6 new units will be produced using 100% virgin content. Even if best case existed, all this activity has additional energy and waste collateral.

Maximizing wasted material is antithetical to waste prevention. Wasted old growth dimensional lumber from wasted houses (demolition and deconstruction) is then destroyed by getting "recycled" into hog fuel and "reused" to produce energy in lumber mills that make lumber. Maximizing the resource is leaving it standing as a house, or preventively better, as a tree.

#### **4. Are there indicators or measures of success you would suggest are used to determine if an outcome is achieved or is achievable?**

- When governments at all levels adopt the Pollution Prevention Hierarchy and the necessary policy and regulations to incentivize only Prevention strategies of ReThink, Reduce at Source, and Reuse by Design.
- When governments at all levels rejuvenate the Conserver Society concepts from the 70's.
- When production of plastic decreases instead of increases each year.
- When wasting is penalized or banned.
- When government a) abandons waste management as a paradigm for waste reduction, and b) takes back and regulates pollution prevention, diversion from landfill won't be needed. Indicators will be less waste, fewer trucks driving waste around creating pollution, and diminished waste management profiteering from excessive waste.
- When Big Oil is very unhappy.

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- When fish aren't dead from eating tires.
- When birds aren't dead from eating plastic.

Mandate Reuse programs for ICI packaging. Set targets for implementation that acknowledge the waste and climate crisis.

### **Target Setting**

#### **5. Should non-residential packaging targets be the same, or better than existing residential packaging targets?**

Better.

Residential packaging targets (RecycleBC) are entirely focussed on collection and access. The Pollution Prevention Hierarchy is incorrectly applied a) as a waste management tool, and b) as a simple list of waste treatment options chosen willy-nilly for best cost effectiveness.

All targets should be governed by the Pollution Prevention Hierarchy, with oversight and enforcement. Recycling Regulations that apply to PRO's must be enforced because they define correct use of the Pollution Prevention Hierarchy. If EPR had been monitored and the Regulations enforced from the start, we would already have design change. Today, PRO's coddle the Producers in trade for the mountains of money circulated in the EPR system.

There is likely nothing to be gained by putting more focus on ICI or residential: it's the same people everywhere who can make the changes. Targets to re-educate Canadians that recycling will never reduce pollution or waste. Our research shows us every day that people still think consumption is OK because "it can be recycled." Residential and ICI targets should eventually be the same: set the bar for prevention for ICI, and mandate residential follow suit.

**Why or why not?** Because there is a waste, pollution, and climate crisis. And because RecycleBC has failed to produce any waste prevention outcomes.

#### **6. What types of targets would be most useful? Reduction targets; reuse targets; recycling targets; diversion targets?**

The only target needed is to implement correct use of the Pollution Prevention Hierarchy. This will automatically prioritize Re-Thinking everything, Reduction at Source, and Reuse by Design everywhere.

#### **7. Should there be regional or business specific targets in addition to provincial targets? Why or why not?**

Eventually, same-same across the board from the Provincial level to regional and across ICI and residential sectors. That means people and the government are rowing in the same direction. Many people in business think RecycleBC applies to their ICI waste, so it makes sense to model collection after RecycleBC. But, outcome targets must follow principles of the Pollution

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Prevention Hierarchy. Reuse, especially by refill, for example, is highly amenable to the ICI sector.

### **8. How can we measure success or progress against established targets?**

Gather data on end fate outcomes of materials and products. It's the only way to know what is happening to materials and to measure success. PRO's will have to track and provide more complete data than the standard now seen in Annual Reports. Diverted to Merlin Plastics means nothing when no one knows what Merlin Plastics does with the products. Diverted is not an end fate outcome. Shredded is not an end fate outcome. Pelletized is not an end fate outcome.

Stop using diversion from landfill as a success measure of waste reduction. It exists only so government landfills don't get full.

Stop taking direction from EPR PRO's that are now part of the problem. Their hands are tied by the revenue stream from producers, primitive waste management practices, and the deal they've made to do something with mountains of waste. All they can do is collect and deliver to the private sector waste management industry of truck drivers.

Stop taking direction from industry polluters for the sake of the economy. It's past time to regulate industry until they can regulate pollution without government oversight. Who else will take responsibility to prevent pollution? Non-profit anti pollution organizations could at one time expose local organizations. Today, we can't find the organizations.

Make Regional Districts fully accountable for all diversion FINAL outcomes, which must be public. "Diverted to" is not an outcome, and means nothing. The waste management industry, including recycling, is a free-for-all. No one knows what happens to anything once it is collected and therefore owned by industry. No one knows how much plastic gets recycled into some useful product, some frivolous product, used for fuel domestically, exported for fuel, or just lost. Merlin Plastic calls everything "proprietary." PRO's don't even know when their "diverted to" product goes out the back door to a cement kiln: "diverted to" is all they need to report success in their Annual Reports to MOECCS.

### **Regional Planning and Local Actions**

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

Provincial: be the standard bearer of the Pollution Prevention Hierarchy and support it with policy and enforcement strategies. Education, already a provincial mandate, is needed to replace the current common beliefs that waste management is working, and that recycling is the cure for everything.

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## **Policies**

### **11. What is already working to prevent packaging waste – for businesses, institutions, haulers, local governments?**

Nothing. There is mostly no education for ICI, so they do what their haulers tell them. Haulers are truck drivers making money from filling bins and driving waste around. Haulers know how to make garbage out of everything, and they know how and where they can make money from “waste” and they know how and where to make it disappear when they can’t make money. That’s their business. Nothing regulates them to do differently as government has abdicated the role of regulation and enforcement, resource conservation, and pollution/waste prevention. The private sector wild, wild, waste is a free-for-all.

You could say that cardboard recycling programs established in the 90’s are still working. But, that is not a measure of prevention.

### **12. Are there other actions that should be considered? What are they?**

Use the Pollution Prevention Hierarchy correctly as a pollution prevention strategy. Stop using the Pollution Prevention Hierarchy as a waste management tool.

### **13. What are the benefits or limitations of these waste prevention options?**

ReThink, Reduce and Reuse will result in less waste. Waste management has and will lobby against any changes. WM, the company, made 20B revenue in 2023 hauling waste. They won’t be happy.

There is no downside to lower plastic production, less pollution, and stopping futile attempts to manage it all.

### **14. How ready are organizations, businesses, governments to implement?**

NRES has been working with the ICI sector since 2020 to prepare businesses for new regional waste bylaws. Mostly, businesses are unprepared, and efforts to improve are thwarted by haulers. Costs to implement waste management strategies such as source separation are prohibitive for most SME. Haulers keep it that way because unsorted waste is considered “contaminated” and taken to landfill. SME saves money. Haulers make money. Regional District makes revenue. Everyone happy.

### **15. How should implementation be prioritized?**

Fast and hard with Reduce and Reuse. It’s the only way. Only prevention and the strategies of Reduce and Reuse will make waste reduction possible and affordable for SME. Right now, the haulers are running away with the profits and businesses have no say in what happens to their “waste,” which our waste audits showed is mostly just wasted materials like containers that could be refilled.

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**NRES has been working with the ICI sector since 2020 to prepare businesses for new regional waste bylaws. Please read the attached project reports from NRES ICI waste audits and ICI diversion projects. ICI readiness, constraints, and infrastructure needs are outlined.**

**16. What are the benefits or limitations of expanded EPR options?**

The benefits are

- revenue from producers could be used to improve access to waste collection for ICI
- collection processes will be standardized to EPR product categories
- producer revenue might result in reduced collection costs for ICI

The limitations are

- Waste volumes will increase, with high contamination rates.
- Cement kilns and mills will have increased feedstock supply for alternative fuel and this will affect pricing. Result will be unstable revenue source for residential and ICI PRO's.
- More bins, more trucks, more traffic, more pollution.
- Haulers and PRO's will make money
- There will be no prevention outcomes from simply adding EPR unless the PPH is enforced.

**17. How ready are organizations, businesses, and governments to implement an expanded form of EPR?**

ICI has no idea what EPR is. If it saves them time or money, they will comply. If not, they won't. They just want to run their businesses and make a profit. That being said, everybody wants to do better for the planet: it just has to be possible and results actually have to be better or people will see through it. Residential recycling has lost participation because people now know recycling hasn't changed anything.

**18. Are there sectors or materials that should be prioritized to be included or excluded?**

Reverse supply chain collection services by EPR is the natural framework for Reuse by Design. HDPE (hard) plastic and glass container design, collection, and refill programs should be mandated/prioritized. Part 5(3) of the Recycling Regulations mandate correct use of the Pollution Prevention Hierarchy. It's all there to support prioritization at the top of the hierarchy.

**19. How should implementation of EPR actions be prioritized (e.g. by sector, by material, by geographic location)?**

PRO's must follow the Recycling Regulations that have been ignored.

They must implement Reduce at Source (not futile greenwashing attempts to reduce waste or environmental impact).

They must implement Reuse, using their own reverse supply chain collection systems.

Prioritize them by materials most amenable to Reuse and by toxicity of material. Pick glass. Tell bloody producers to standardize container design across products to expand use. What do I





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care if my shampoo container looks like my dishwashing soap container? Brand designers can get over it. The decades are passing us by while the planet burns.

Thank you for the opportunity to present another unpolished document to support important policy development.

Sincerely,

Jan Hastings, Executive Director  
Nanaimo Recycling Exchange Society  
[jan@recycling.bc.ca](mailto:jan@recycling.bc.ca)

2024-07-16

Re: Preventing Waste in British Columbia: Non-Residential Packaging & Paper Products

To Minister Heyman,

Thank you for considering a system to increase packaging recycling in the ICI sectors, and efforts to reduce unnecessary plastic packaging. Ocean Wise is a globally focused conservation organization on a mission to protect and restore the ocean. Consultations like this, which address plastic pollution head on, are critical to our work and we are pleased to provide our response here.

Our responses to the discussion questions are provided below. Only questions with responses have been included, and others have been omitted. First, we have a few broad comments that guide our thinking in the responses to the questions.

The overall goal of an ICI packaging EPR program should be to reduce the harm created through the disposal of packaging materials. The priorities to achieve this should be: first, reducing the amount of packaging in need of disposal, and then effectively capturing the packaging material and applying the waste hierarchy

The disparity in waste management and recycling infrastructure between communities within the province is a major issue to resolve. As it currently stands, many small and medium-sized enterprises in small and medium-sized communities across the province have a challenge in diverting their waste materials when those same materials are easily and affordably diverted in other parts of the province. Often, the logistics and lack of infrastructure make it commercially difficult to divert the packaging material, moving the cost of managing these materials onto the communities. An effort to both collect all of the readily recyclable plastics across the entire province, and reduce the unnecessary and problematic plastics is an effective step towards reducing plastic waste in the environment.

We have included the discussion questions in italics and the responses below.

*1. Are there any desired outcomes missing from this list?*

An outcome that is suggested but should be more explicit is capturing **all** ICI packaging material and keeping it out of the environment. If this is prioritized in both the residential and ICI packaging programs, it should result in a dramatic reduction in packaging found in the environment and on shorelines<sup>1</sup>.

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<sup>1</sup> According to the Shoreline Clean Up Dirty Dozen, food packaging is a major contributor to litter found on the shorelines. Shoreline Clean Up Data is available at [ocean.org/blog/ditching-the-dirty-dozen-2023/](https://ocean.org/blog/ditching-the-dirty-dozen-2023/)

Encouraging innovation in the ICI packaging sector through the EPR programs should be included as a desired outcome, to ensure BC becomes a leader in effective waste management and the circular economy.

2. *What outcomes are most relevant to your business, organization, or community?*

Keeping plastic and hazardous material out of the ocean is a key priority for Ocean Wise. This cannot just be done through capturing material, but must include targets for reduction and redesign of items that are most likely to break into microplastics, or most likely to end up in the environment.

3. *How would you prioritize these outcomes?*

Waste prevention must come first. Prevention is the most cost-effective measure and requires the least transportation, processing, and has the least environmental costs - by not creating waste in the first place, we avoid direct and indirect downstream management costs. This is acknowledged in the instant discussion paper, which states that “the costs of landfilling and treating waste may increase significantly” in response to growing waste creation and decreasing available landfill space. Most of the priorities outlined in the discussion paper apply a waste management lens, whereas looking at EPR through a lens of waste reduction and prevention instead of capture is more inline with what is needed.

From a consumer behaviour perspective, consistency should be second highest priority. We get better source separation outcomes when users understand the waste management system, which is facilitated by consistency in policy (Knickmeyer, 2019). For the user, using the waste system should be the same no matter what context (at home, at work, at school, at business), and across different areas of the province. Ultimately humans are the ones disposing of materials and programs should be designed with the human user in mind. For example, Wu et. al. (2018) found that “standardization of bin position should be prioritized for jurisdictions and institutions seeking to reduce contamination in waste disposal bins.” By creating consistency in the waste streams, bin placement, and signage, better sorting and waste management outcomes result.

4. *Are there indicators or measures of success you would suggest are used to determine if an outcome is achieved or is achievable?*

Using data from Ocean Wise’s Shoreline Cleanup program<sup>2</sup> can help to identify items like cigarette butts that are packaging but often not included in EPR

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<sup>2</sup> Knickmeyer, D. (2020). Social factors influencing household waste separation: A literature review on good practices to improve the recycling performance of urban areas. *Journal of Cleaner Production*, 245, 118605. <https://doi.org/10.1016/j.jclepro.2019.118605>

<sup>3</sup> Wu, D. W.-L., Lenkic, P. J., DiGiacomo, A., Cech, P., Zhao, J., & Kingstone, A. (2018). How does the design of waste disposal signage influence waste disposal behavior? *Journal of Environmental Psychology*, 58, 77–85. <https://doi.org/10.1016/j.jenvp.2018.07.009>

<sup>4</sup> Shoreline Clean Up Data is available at [ocean.org/blog/ditching-the-dirty-dozen-2023/](https://ocean.org/blog/ditching-the-dirty-dozen-2023/)

programs and are highly problematic. This data can also support items that are not effectively being captured.

Landfill composition reports, which are regularly completed by the managing municipality or regional district, are a good indicator of the success of a program. When packaging EPR covers both the residential and ICI collection points, packaging should be almost eliminated from the landfill.

*5. Should non-residential packaging targets be the same, or better than existing residential packaging targets? Why or why not?*

Targets for an ICI packaging EPR should be more aggressive than the residential ones, in particular around plastic capture rates, especially for flexible plastics. ICI flexible plastic, including pallet wrap, should have a much higher capture rate compared to residential, which prior to EPR intervention had no diversion potential. Businesses have more information about what they buy and more control over it, they can ask suppliers about packaging, and should be able to instill strict disposal procedures. Therefore, businesses should also have higher targets for diversion.

*6. What types of targets would be most useful? Reduction targets; reuse targets; recycling targets; diversion targets?*

Reduction targets are most important because waste reduction at the source is the top of the waste hierarchy, as well as most cost-effective solution to waste management.

Focusing instead on capture rates or weights of captured plastic as targets risks unintended consequences, such as producers being rewarded for capturing more material after putting more material on the market. This can be addressed by providing financial incentives for targets related to reductions in packaging being put onto the market or increasing use of reusable packaging.

There should be caution about setting goals about packaging including post-consumer recycled content (PCR). Focusing on including PCR bolsters the market for possibly unnecessary packaging, that then needs to be captured and remanufactured, blended with virgin materials.

Care should be given that formalized targets do not have negative consequences on informal circular economy initiatives. Examples of informal may be a restaurant giving used buckets to a school for science or art classes, or a garden centre collecting used egg trays for seedlings.

*7. Should there be regional or business specific targets in addition to provincial targets? Why or why not?*

Yes, regional and business specific targets are required alongside provincial targets.

For communities without ready, affordable access to recycling for the ICI sector, targets should be put in place around access to and adoption of the EPR programs. In these circumstances goals should focus on capture rates and tonnages compared to landfilling.

In communities with existing recycling infrastructure, any targets around capture or tonnage need to be coupled with targets for reduction and reuse. This can

help ensure goals are not achieved by putting unnecessary packaging onto the market or discouraging reduction efforts.

Regional specific targets are needed to ensure a system is adequately implemented across the entire province and does not focus on areas like Metro Vancouver or the Capital Regional District that generate larger amounts of packaging waste.

Regional goals should not be a way to have lower expectations for rural recycling rates, but rather a way to ensure those communities have the program effectively implemented. The program cannot be delayed while working to establish current baselines for service, capture and tonnage. Many regional districts, landfill owners and operators, and municipalities already have waste composition reports and tonnage reports that can be used to set baselines.

Specific industries that have a disproportionate effect on overall packaging waste system and specific packaging should have their own goals.

For example, there are some businesses that are responsible for large portions of packaging waste in specific sectors, such as GFS and Sysco in the food distribution business, and Great Little Box Company or Uline, both of which provides significant portions of packaging into the BC market. For these larger suppliers of packaging, setting reduction and capture goals for them would have a large impact on the overall systems.

*9. What actions are best suited at the local, regional, or provincial level of government?*

It is important that education and enforcement of the program does not get downloaded onto municipalities without sufficient funding to match the required efforts and targets.

The collectors of the packaging material should be responsible for covering the costs of all education and enforcement of the program, including translation of the educational materials into languages other than English to ensure all SME businesses are able to effectively participate in the program. This promotes the Consistency and Accountability priorities because education and enforcement will be standardized province-wide.

Local governments should not have to bear the cost of enforcement especially in the first few years of establishing the EPR program when businesses are being onboarded and educated.

The Province should enact a waste hauler and waste processor handling regime to ensure that all businesses that handle waste are being transparent with the material, making disposal decisions based on the waste hierarchy, and ensuring all EPR materials are properly accounted.

*10. What factors should be taken into consideration if the Province enables or promotes local actions?*

When the province is considering local actions and targets, the Province should consider the local infrastructure to ensure that it can achieve those targets, and if not the EPR should be responsible for bringing infrastructure up to speed. For example, if reuse targets are in place but reused packaging needs sanitization,

the EPR program should work with the sector to enable access to a sanitization vendor, including warehousing and transportation.

Local waste management should be prioritised as much as possible, as it will not only support a reduction in carbon emissions, but build resilience into the program. For example, in 2021 with the floods in the Sumas prairies, RecycleBC had to pause EPR collection across the province. Localizing the system and reduction efforts mean major storms or other disruptions will have less impact on the whole system.

*11. What is already working to prevent packaging waste – for businesses, institutions, haulers, local governments?*

Some industry-led take-back programs have been partially effective, like the blue pallet program, but we still see a significant amount of pallets being littered and chipped. There is also a lack of responsibility for the collection of damaged blue pallets, showing a challenge of industry-led programs, and their unresponsiveness to repair.

Another example of returnable packaging is some ink cartridges for commercial grade printers. These are often used on a subscription service, with empties being returned via mail for refill and reuse.

Institutionally, schools have a culture of bringing your water bottle as one of the key items you bring to school every day, have in-class composting projects, share/reuse school supplies, and waste as a part of the curriculum. Schools are where young people learn how to be in society. Schools should be model waste reducers and need resources to establish this role in the community because it pays dividends later. When students leave they should have a strong sense of what goes where.

*12. Are there other actions that should be considered? What are they?*

Any action undertaken needs to be transparent and accountable, particularly anything that results in waste packaging material being transferred across provincial or international boundaries.

*13. What are the benefits or limitations of these waste prevention options?*

When creating a list of designated recycled materials and supporting actions, items or materials should also be designated for prevention. An example of a similar list is the Canadian Plastic Pact's Problematic and Unnecessary plastics list which shows items that are problematic. The packaging items on this list should have higher costs associated with them.

Disposal bans can be a complimentary policy but should not be the lead effort. Disposal bans without meaningful infrastructure is a punitive measure – people are either going to pay higher fees and be annoyed with the waste system or dump illegally. Further, disposal bans have not been proven to be wholly effective. In Metro Vancouver for example, while the amount of organics in the landfill was reduced after the introduction of a disposal ban in 2015, it has remained fairly constant at about 30% since then. In part, this is because the cost of the fine for a disposal ban violation is often spread among many ICI customers, so even those who are compliant are penalized with higher tipping fees, and those who are not compliant do not see additional fines levied for non-compliance.

Reuse requirements should be extended to closed loop or closed environment locations, such as theatres, arenas, festivals, conferences and other events, hotels, on local and national flights, ferry rides, schools and post-secondary institutions, houses of worship that serve food, food courts in malls, resorts, long-term care facilities and group homes. These environments have an advantage in reuse with less packaging being either brought from the outside or taken outside for disposal.

Standardized actions for ICI and provincial data standardization should be implemented, as it will make it easier for businesses to know how to use the waste system, and it would promote consistency and accountability. The reporting should be broad enough to incorporate the more diverse types of ICI waste compared to the residential sector.

*14. How ready are organizations, businesses, governments to implement?*

Given the existing disposal bans on many types of packaging in Metro Vancouver, the ICI sector in that region should be able to implement fairly quickly.

Many businesses report that they would like to decrease their reliance on single use packaging and reduce waste, but feel they are unable to due to the larger logistics system that they have little influence over. Cooperation from businesses that may have an outsized impact on the amount of packaging in the ICI sector, for example Sysco and GFS in the restaurant sector, is required to quickly adopt a new system and engage on reduction efforts.

*15. How should implementation be prioritized?*

Implementation in small and medium sized communities without access to affordable recycling services should be a priority for implementation. Bringing the standard up for all communities will have a positive impact on landfill space across the province, as well as starting to increase the culture of recycling. Institutions like museums, schools, and government facilities can be the leaders in these communities.

With the implementation should come an EPR-led education campaign to ensure compliance, awareness and understanding of the program. Financial penalties should be levied on packaging producers for not making their packaging compliant with the program before penalties are assessed to the ICI sector for contamination or misunderstanding the program.

*16. What are the benefits or limitations of expanded EPR options?*

One limitation of an expanded EPR program would be reluctance to explore alternative packaging options that would require separate collection systems, such as reusable or compostable, unless it is strictly mandated. This could be mitigated through targets for plastic packaging reduction and requirements for local processing capabilities.

*17. How ready are organizations, businesses, and governments to implement an expanded form of EPR?*

It should be possible to include ICI material that is similar to the material collected in the existing residential EPR program - such as packaging materials from schools, offices, public facilities, restaurants and events – in the near term.

While additional capacity will be needed to accommodate the increase in material, it is a reasonable requirement.

Coordinating contracts and ensuring all businesses are compliant will be an early challenge. In other areas, establishing the collection, infrastructure needs and transportation routes may take more time to implement.

*18. Are there sectors or materials that should be prioritized to be included or excluded?*

Packaging items that are found most commonly in the environment should be prioritized for inclusion in the program. This includes cigarette butts, food packaging, and plastic products that are designed to be disposable. Ocean Wise Shoreline Clean Up data can be leveraged to determine what these packaging items are, and how commonly they are found.

*19. How should implementation of EPR actions be prioritized (e.g. by sector, by material, by geographic location)?*

Prioritization should be in smaller and medium sized communities that don't have existing infrastructure and access to recycle and divert easily divertible material. First step should be bringing up the floor to ensure cardboard, paper, PET, HDPE is collected and not landfilled. This will help create social norms and a culture of diversion for these very divertible items.

Starting province-wide reuse and refill programs should be an additional priority for implementation, to ensure that collection systems and investments are not made for packaging that should be eliminated.

Thank you for the opportunity to submit feedback on the draft paper. Increasing access to cost-effective capture of packaging products in all parts of the community will have a positive impact on reducing plastic items in the ocean.

Sincerely

Charlie Cox

Director, Ocean Pollution & Plastics



[Charlie Cox \(Jul 16, 2024 16:17 PDT\)](#)



July 15, 2024

Sent by EMAIL

Circularcommunities@gov.bc.ca

**Re: Polystyvert response to the consultation entitled: Preventing Waste in British Columbia – non-residential packaging and paper product**

To whom it may concern,

Polystyvert is grateful for the opportunity to respond to the consultation on waste prevention in British Columbia.

Polystyvert is a Canadian leader in styrene-based plastic recycling located in Montreal, QC, working with multiple raw material suppliers, processors/converters, equipment suppliers, recyclers, and brand owners. Our unique patented dissolution and purification technology offers the shortest closed loop for recycling styrene-based plastic (PS and ABS). We operate at low temperature and without any water, making our process very energy efficient thus achieving a significant reduction in carbon footprint, up to 90% less GHG compared to virgin production of PS.

We provide a solution for highly contaminated polystyrene waste that lack suitable options within conventional recycling methods and that would otherwise end up in landfills or incineration. This process transforms them into high-quality plastic with properties similar to virgin material.

With our ESG centric business model, we share the BC government's objectives to create a low-carbon circular economy for plastics and to keep plastics from entering the environment.

Please find below Polystyvert's comments and recommendations regarding the consultation.

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## Introductory comments

We support the BC government in its goal to foster economic benefits for a strong circular economy as well as its leadership to support 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.

As mentioned in the consultation document, targets are an important way to provide focus, to motivate action and measure success toward shared values and goals.

Polystyrene waste can be challenging to recycle specially when highly contaminated but through innovative practices such as Polystyvert's dissolution and purification technology, it is nowadays one of the easiest resin to recycle back into its virgin quality.

As we are based in Quebec with expansion objectives throughout Canada and abroad, we can speak from experience in referring to the modernisation of the Quebec EPR system and its ambitious targets. For example, polystyrene has been the focus of a special attention and producers will have to comply to recycling objectives that we believe will accelerate demand and deployment of innovative recycling technologies such as Polystyvert's.

**As an example, the Quebec government has set a target of 75% of local recycling in the category of 'other plastics', which includes PS, by 2030. PS will also have to be mandatory recycled by 2027 for both residential and ICI.**

We believe that regulatory frameworks similar to the model adopted by the Province of Quebec, in addition to the Federal government upcoming regulation to set minimum recycled content requirements in plastic products and packaging, will be decisive in the achievement of zero plastic waste objectives and the decarbonation of our economy.

We would like to outline that similar regulation are undertaken in Europe through the Plastic Packaging Waste Directive (PPWD), and the UN negotiations to end plastic waste at the global level. There are a benefit in harmonizing those rules and they will undoubtedly contribute to the economic viability of new technologies and their scaling up, as well as their international deployment.

Finally, we agree with the 3RV hierarchy and the importance to take into account the full environmental impacts of alternatives, to reduce the unnecessary use of plastics. Our technology reduces the environmental footprint of PS by up to 90% compared to virgin PS production, making sure that f highly contaminated products and packaging waste that are already on the market are divert them from incineration and landfills.

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## Discussion questions

**1. Are there any desired outcomes missing from this list? 2. What outcomes are most relevant to your business, organization, or community?**

We fully support all the outcomes outlined in the consultation document, in particular the “economic benefits for a strong circular economy: the government leadership to 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.”

Polystyvert’s technology is economically viable and discussions are under way with local industrial partners to implement a commercial plant in BC. In our roadmap to commercial deployment of our technology, the first commercial plant will be located in Montreal, Quebec, and will be in operation by 2026. Our goal is to use this first plant as a showcase for the sale of licences in other markets, in Canada and abroad, in collaboration with industrial partners and the whole value chain.

**4. Are there indicators or measures of success you would suggest are used to determine if an outcome is achieved or is achievable?**

Traceability of the material in reporting systems through EPR is one good way to measure if the outcomes have been achieved against the targets.

**5. Should non-residential packaging targets be the same, or better than existing residential packaging targets? Why or why not?**

As long as there is a proper transition period for implementing those changes, we believe the targets should be the same in order to simplify compliance and understanding of the system.

**6. What types of targets would be most useful? Reduction targets; reuse targets; recycling targets; diversion targets?**

As it is the case in the Quebec modernisation of curbside recycling system, we support ambitious targets to make the recycling of PS mandatory, it’s local recycling in order to avoid waste dumping abroad and foster a local circular economy of plastic waste, as well as a minimum requirement of recycled content in plastic products and packaging.

ICI should definitely be part of this effort as we find high volumes of PS feedstock in that stream, with packaging being used for protection (TV, small appliances) and fish iceboxes in B2B in grocery stores, to name a few. In addition, landfill bans could help support a

circular economy for plastic waste by closing the door to a too often affordable option that ends up competing against recycling efforts.

**As an example, the Quebec government has set for local recycling targets for other plastics which includes PS at 75% by 2030. PS will also have to be mandatory recycled by 2027 for both residential and ICI.**

Failing to put mandatory recycling for PS waste for ICI as well as local recycling targets will perpetuate the current model which is that PS waste is sent to landfill or shipped abroad.

## **12. Are there other actions that should be considered? What are they?**

These targets should go hand in hand with government investments in recycling infrastructures to ensure quality recyclable material at affordable price for recyclers. Lastly, sorting centers are an essential player and investments in optical sorters for example, to ensure quality sorting, as well as key performance indicators can greatly benefit the value chain as a whole.

Many jurisdictions around the world have taken major steps to achieve their zero plastic waste strategy such as other Canadian provinces, the federal government and the European Union. The implementation of a stringent regulatory framework has proven to be a necessary step to structure the value chain, ensure standardisation, traceability and transparency of data, and ultimately, a strong circular economy for plastics.

In conclusion, we believe that those measures will support a better management of packaging end of life in many key industries and encourage those industries to support innovative recycling technologies such as Polystyvert's in order to achieve the government's vision, **with the future construction of a Polystyvert commercial plant in BC**. We look forward to contributing to this vision by supplying brand owners with more and more high quality, purified and regenerated plastic resins over the years to come.

We appreciate the consideration that will be given to our comments and are available should you need any additional information. Please do not hesitate to contact me at your convenience at [vbussieres@polystyvert.com](mailto:vbussieres@polystyvert.com).

Sincerely,



Virginie Bussières, MBA  
Vice-President, External Affairs and Partnerships



Paper and Paperboard Packaging  
Environmental Council

# Preventing Waste in British Columbia: Non-Residential Packaging & Paper Products Discussion Paper

PPEC SUBMISSION

July 23, 2024



July 23, 2024

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**RE: Preventing Waste in British Columbia: Non-Residential Packaging & Paper Products Discussion Paper**

Dear Ms. Lohbrunner:

On behalf of the Paper and Paperboard Packaging Environmental Council (PPEC), which represents the environmental interests of the Canadian paper packaging industry, thank you for the opportunity to provide comments on British Columbia's "Preventing Waste in British Columbia: Non-Residential Packaging & Paper Products" Discussion Paper.

PPEC members represent several different components of the paper packaging recycling value chain: as providers of recyclable paper-based packaging, processors and recyclers of collected paper materials, and as end markets who buy back recycled fibres to reuse in their operations.

Our industry has been a pioneer in recycling, implementing a circular economy for paper packaging long before it was widely recognized, driven not by regulation, but because it makes environmental and business sense to make paper packaging products using recycled fibres.

PPEC members have decades of experience with recycling – which includes mills buying back used paper materials directly from the Industrial, Commercial, and Institutional (IC&I) sector to use in their operations – and provides our industry with insights that we hope the government will consider.

PPEC looks forward to continuing to participate in discussions as the government considers feedback from this consultation and next steps on preventing non-residential packaging waste in B.C.

If you have any questions, please do not hesitate to contact us.

Kind regards,

Rachel Kagan  
Executive Director, PPEC  
[rkagan@ppec-paper.com](mailto:rkagan@ppec-paper.com)

## **Executive Summary**

The Paper and Paperboard Packaging Environmental Council (PPEC) represents the environmental interests of the Canadian paper packaging industry. A summary of PPEC’s comments and recommendations in response to British Columbia’s “Preventing Waste in British Columbia: Non-Residential Packaging & Paper Products” Discussion Paper are below.

### **1. Data**

- The government must make evidenced-based policy decisions by ensuring it has the data it needs – packaging generation, collection, and recycling (and other forms of diversion such as composting) statistics in the IC&I sector; as well as information on the current state of the infrastructure, technology, and equipment that exists to collect and process materials; and availability of local end markets – to inform potential policy and regulatory decisions.
- Additional information on the composition of the paper and paperboard disposal data (proportions of OCC, boxboard, newsprint, and other types of paper, as well as any contamination details) is needed to help identify potential solutions.

### **2. Targets**

It may be premature to establish or discuss targets at this early stage without information on the direction the government may take, however, we offer the following comments:

- Non-residential packaging targets should not be the same as existing residential packaging targets as the sectors are different.
- To date, residential packaging targets have focused mostly on collection. If the goal is to increase recycling of materials, then targets should reflect that and be clearly defined as such.
- For targets to be effective, they must be based on data; and for targets to be tracked, there must be accountability and reporting with consideration being given to keep company data confidential due to competition concerns and the use of aggregated recycling data.

### **3. Definitions**

- The term “readily recyclable” needs to be defined to ensure clear policies are implemented.
- The government should review its definition of “recyclable material” under the *Environmental Management Act* to ensure it continues to be accurate and reflective of British Columbia’s current and future recycling system.

### **4. Landfill or Disposal Bans**

- PPEC supports the proposal to introduce disposal bans for packaging materials including Old Corrugated Cardboard (OCC).
- For bans to be effective there must be a strong regulatory framework that clearly defines banned materials, outlines who is responsible for compliance, and includes penalties for non-compliance.
- Landfill bans must be accompanied by dedicated resources for enforcement and inspections to ensure it is effective and legally enforced.

## **5. Standardized actions, data sharing, and recognizing the entire recycling value chain**

- PPEC supports the proposal to consider having businesses and institutions adopt specific waste prevention actions and share data.
- The government must oversee any new business requirements by:
  - Dedicating resources to enforcement and compliance.
  - Introduce measures to help support diversion and create economic incentives that promote recycling over landfilling.
  - Require accountability and aggregate data sharing for those that are involved in the collection, management, and recycling of materials.
- It is also important to specifically consider the role of waste management companies – and the opportunities for potential standards or best practices related to quality of materials and preventing contamination – to achieve higher rates of waste diversion in the non-residential sector.
- The government must acknowledge that the recycling value chain is complex and involves many other players – not just the institutions where waste is generated – and that any new policy must recognize, and hold accountable, others along the value chain to ensure all players are doing their part to properly divert waste from landfill.

## **6. Extended Producer Responsibility (EPR)**

- While PPEC supports efforts to increase recycling and waste diversion, we generally do not support an EPR policy approach for managing recyclables in the IC&I sector.
- It is not appropriate to consider an EPR approach for IC&I when EPR for residential paper and packaging is in its infancy in Canada.
  - British Columbia is the only province with a true EPR model (where producers are 100% responsible for operating and funding the program), while other provinces are either in the process of developing or transitioning to full producer responsibility models.
  - It will take time to see if this shift to true EPR results in higher recycling rates and program efficiencies, and it is important to provide the necessary time to learn from these changes.
- When it comes to paper packaging, PPEC member companies are already taking responsibility by promoting the use of recycled content and acting as end markets by buying back used cardboard and paper materials from grocery stores and other commercial entities. Paper fibers are being successfully recycled in the IC&I sector and we hope that other industries can look to our sector as a model for implementing effective recycling practices for their materials.

## **7. Timing**

- While we understand that the government has made a commitment to identify a policy approach for non-residential packaging and paper products in 2025, PPEC recommends that these timelines be reconsidered due to new research and data that is expected to be released this year that could help inform B.C.'s approach.



**Table of Contents**

Executive Summary ..... 3

About PPEC and the Canadian Paper Packaging Industry ..... 6

    Mills ..... 6

    Converters ..... 6

    Recyclers ..... 6

    Paper Packaging’s Circular Economy ..... 7

Data ..... 7

Provincial Target Setting ..... 9

Proposed Policy Options to address non-residential packaging ..... 10

    List of designated recycled materials and supporting actions ..... 10

    Disposal bans for packaging materials ..... 11

    Standardized management actions and data sharing for businesses and institutions ..... 12

Extended Producer Responsibility ..... 13

Timing ..... 15

## **About PPEC and the Canadian Paper Packaging Industry**

The Paper and Paperboard Packaging Environmental Council (PPEC) is a trade association representing the environmental interests of the Canadian paper packaging industry.

PPEC members consist of companies from Canada's paper packaging and recycling sectors, representing key components of the paper packaging recycling value chain. PPEC members are not only providers of recyclable paper-based packaging, they are also processors and recyclers of collected paper materials, and act as end markets by buying back used fibres to use in their operations, reducing the need for virgin fibres.

PPEC's mill and packaging converter members operate across Canada and manufacture the three major packaging grades that PPEC represents: containerboard (used to make corrugated boxes), boxboard (used to make boxboard cartons ie. cereal boxes), and kraft paper (used to make paper bags).

### **Mills**

Mills produce containerboard and paperboard from raw materials, using recycled content as their primary feedstock, transforming recycled paper into new paper packaging products.

Mills also act as end markets in the recycling value chain as they buy back bales of collected recycled paper fibres to use in their operations. The bales are then pulped at the mill to transform it into the type of board or paper that the mill specializes in, such as linerboard or corrugating medium, to produce what's collectively called containerboard, boxboard, or kraft paper.

The result are big rolls or sheets of paper that are then shipped to a converter (also known as box plants).

### **Converters**

PPEC's packaging converter members specialize in transforming the raw packaging – the large rolls and sheets – into finished packaging products which are printed, creased, folded and glued, and then sent on to a packer or the customer to be filled with product. Any waste material from the converting process (such as corrugated cuttings or boxboard trim) is collected on-site and sent back to a mill for further recycling.

### **Recyclers**

In addition to mills and converters, PPEC's membership also represents part of the recycling and waste management sector. In many cases, mills have their own recycling operations that focus on collecting and processing recyclable materials to prepare them for re-entry into the manufacturing process. These facilities feed supply back to mills, and the cycle repeats itself through the action of recycling.

## **Paper Packaging's Circular Economy**

As our members typically engage in business-to-business transactions, rather than directly supplying finished products to consumers, PPEC does not represent producers in the same way other industry trade associations might, whose members are directly involved and obligated by legislated residential recycling programs.

However, recycling is a key issue for PPEC and its members because it is essential to the Canadian paper packaging industry's long-standing circular economy. Environmental sustainability, waste minimization, and prioritizing the use of recycle content is an inherent part of our industry's business model, and it's been that way for decades.

According to [PPEC's 2022 Recycled Content Survey Report](#), the average recycled content for domestic shipments of containerboard and boxboard – used to make some of the most common forms of paper-based packaging such as corrugated cardboard and paperboard – is just over 80%, allowing renewable raw materials to flow for longer, and reducing the need to extract virgin materials.

PPEC is proud of our industry's circular economy approach to managing paper packaging products, which are continually collected and recycled through residential and business recycling programs across Canada, allowing them to be remade into new paper packaging products again and again through the important act of recycling.

The decades of experience PPEC members have with embedding recycling into all aspects of their business operations – including mills purchasing used paper materials directly from the IC&I sector – provides our industry with insights that we hope the government will consider.

### **Data**

PPEC encourages the Government of British Columbia to make evidenced-based policy decisions by ensuring it has the data it needs to inform any potential policy and regulatory decisions.

For recycling policies and programs to be successful, they must be based on sound information, which includes having up-to-date data on packaging generation, collection, and recycling statistics in the IC&I sector. In addition, information is also needed on the current state of the infrastructure, technology, and equipment that exists to collect and process materials, as well as the availability of local end markets to sell processed materials to ensure that they are recycled.

It is also important to consider the province's organic recycling and composting capacity into its decision-making. This is an important consideration, especially for fibre-based materials, which, when soiled with food, can be composted, if not recycled.

Having this type of detailed information made publicly available will help identify the opportunities and challenges related to how to effectively increase waste diversion and recycling in the non-residential sector, especially in a province such as British Columbia, which is uniquely positioned geographically between oceans and mountains. While we recognize that the province has an established system for waste management and recycling in place, the government needs to consider its location, in addition to information on capacity, infrastructure, and end markets, in its decision-making to ensure the system can handle the collection, processing, recycling, and composting of an increased range of materials.

Waste management data in the IC&I sector is often limited or incomplete because private waste management companies are not required to share or report their data.

That said, PPEC is encouraged that the government has baseline information on the current state of IC&I Packaging and Paper Products (PPP) end-of-life management with the publication of its [British Columbia Industrial, Commercial and Institutional Packaging and Paper Products Baseline Report: Waste Flows Study](#) (Canada Plastics Pact, April 2023).

We understand that the project was scoped to target those IC&I sub-sectors for which PPP data are most readily available, with a focus on businesses that are receiving services from a waste management company. The findings show that the PPP disposed consists mainly of fibre and plastic in a relatively even proportion at approximately 12%, or over 100,000 tonnes per material per year.

Those figures are mostly aligned with statistics provided in the government’s Discussion Paper, which states that “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,” and goes on to provide the following graphic detailing waste by type.

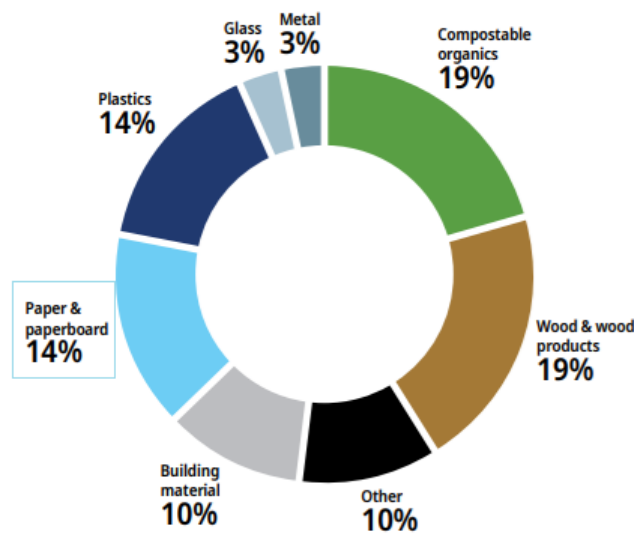


Figure 1. Waste by type – Over 50% of our waste disposed is from recyclable or compostable materials: organics (e.g., food scraps), plastics, paper, metal, and glass).

Image from [Preventing Waste in British Columbia: Non-Residential Packaging & Paper Products Discussion Paper](#)

For the statistics provided from both the Discussion Paper and Waste Flows Study, it seems that 12% to 14% of what is disposed of in B.C. landfills is paper and paperboard.

However, it is difficult for PPEC to provide comments or recommendations as the composition of materials disposed of is not available. If possible, PPEC requests additional information on the composition of the disposal data, including the proportions of OCC, boxboard, newsprint, office paper, and any contamination details. Having this information will help us be in a better position to effectively identify solutions.

When it comes to recycled materials, the findings from the Waste Flows Study state that “fibre materials are by far the most common ICI PPP material collected for recycling (66-96%), with the main sub-sector contributors to ICI PPP collected for recycling are Trade (i.e., retail and wholesale), Transportation and Warehousing, Manufacturing, and Food services.”

*Table E-03: Overview of ICI PPP collected for recycling*

	Industry waste audit (i.e., Section 4)	Service provider feedback (Section 5)
<b>Total ICI PPP collected for recycling* (tonnes)</b>	517,000	150,000 - 250,000
% PPP Fibre	66 to 96% by sub-sector	90%
% PPP Plastic	5 to 18% by sub-sector	8%
% PPP Metal	0 to 12% by sub-sector	1.4%
% PPP Glass	0 to 18% by sub-sector	1.1%

\* Rounded to the nearest thousand

Image from [British Columbia Industrial, Commercial and Institutional Packaging and Paper Products Baseline Report](#)

The reported recycling data aligns with the experiences in the paper packaging industry, where PPEC members often serve as the end markets for buying back fibre materials. Mills purchase used cardboard and paper from various trade sectors, including grocery stores and other commercial entities, so that those fibres can be responsibly recycled and reused to create new paper packaging products.

Contracts and agreements are in place between companies setting out the terms of purchase for mills to buy back paper fibre materials, and it’s been this way for years. Paper fibers are being successfully recycled in the IC&I sector and we hope that other industries can look to our sector as a model for implementing effective recycling practices for their materials.

### **Provincial Target Setting**

In general, PPEC believes that targets must be based on data, including the current state of collection, processing, and recycling (meaning materials have an end market and are sold).

In relation to this consultation, it may be premature to establish or discuss targets at this early stage without information on the direction the government may take, however, we offer the following comments in response to some of the Discussion Paper questions about potential targets.

First, we believe that non-residential packaging targets should not be the same as existing residential packaging targets as the two sectors are very different.

Residents generates waste and recyclables from homes and apartments, while the IC&I sector generates materials from a variety of distinct locations such as manufacturing facilities, retail and grocery stores, malls, restaurants, offices, hotels, stadiums, airports, schools, and hospitals.

The differences in where materials come from need to be taken into consideration as options for increasing waste diversion in the IC&I sector are considered, as they can have impacts on how materials are collected, managed, and ultimately recycled.

Second, with regards to what types of targets would be most useful, given the goal is to increase recycling in the non-residential sector, then recycling targets would be most useful.

To date, residential EPR packaging recycling program targets have focused mostly on collection. If the goal is to increase recycling of materials, then targets should reflect that and be clearly defined as such.

However, for any targets to be effective, they must be based on data; and for targets to be tracked, there must be accountability and reporting. Since the residential and IC&I sectors are different – with residential historically serviced publicly by municipalities, and IC&I serviced by private waste management companies – it will require new thinking to be able to identify how best to have waste management companies and/or other obligated companies, report on the quantities and types of recyclable material that are collected, processed, and recycled. Company data would need to be kept confidential due to competition and privacy concerns, with data needing to be aggregated.

### **Proposed Policy Options to address non-residential packaging**

PPEC offers the following comments on some of the proposed policy options outlined in the Discussion Paper.

#### **List of designated recycled materials and supporting actions**

Table 3 of the Discussion Paper describes this proposed option as “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.”<sup>1</sup>

While PPEC’s specific comments on the actions will follow, we would offer a comment on the need to define “readily recyclable” to ensure clarity and alignment with British Columbia’s recycling system.

The province’s *Environmental Management Act* currently defines “Recyclable Material” as:

*A product or substance that has been diverted from disposal, and satisfies at least one of the following criteria:*

- (a) is organic material from residential, commercial, or institutional sources and is capable of being composted, or is being composted, at a site;*
- (b) is managed as a marketable commodity with an established market by the owner or operator of a site*
- (c) is being used in the manufacture of a new product that has an established market or is being processed as an intermediate stage of an existing manufacturing process;*
- (d) has been identified as a recyclable material in a waste management plan;*
- (e) is any other material prescribed by the Lieutenant Governor in Council, or the minister under section 22 [minister's regulations — codes of practice.]*

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<sup>1</sup> Preventing Waste in British Columbia: Non-Residential Packaging and Paper Products Discussion Paper, page 21. <https://engage.gov.bc.ca/app/uploads/sites/121/2024/04/Preventing-Waste-in-British-Columbia-Non-Residential-Packaging-and-Paper-Products-Discussion-Paper.pdf>

Defining recycling is critical to ensure all stakeholders along the recycling value chain – from governments to waste management services providers to businesses – understand what activities are considered recycling. This will help ensure clear policies are implemented and that activities can be properly managed and reported.

PPEC recommends the government review its definition of “recyclable material” under the *Environmental Management Act* to ensure it continues to be accurate and reflective of British Columbia’s current and future recycling system.

PPEC defines recycling as the marketing and selling of a material so that it can be used in the manufacture or transformation of a new product.

### **Disposal bans for packaging materials**

PPEC supports the proposal to introduce disposal bans for packaging materials, including Old Corrugated Cardboard (OCC).

Banning corrugated boxes from landfill would reduce methane and carbon dioxide emissions from landfills, increase waste diversion, prolong landfill life; and reduce packaging mills’ needs to import used paper fibres from other jurisdictions as more materials could be recycled locally, where containerboard mills exist.

However, for landfill bans to be effective there needs to be a strong regulatory framework that defines the banned materials, outlines who is responsible for compliance, identify where compliance occurs, includes penalties for non-compliance, reporting and monitoring provisions, and provides information on how the ban will be legally enforced.

Such a policy must be accompanied by dedicated resources for enforcement and inspections to ensure it is effective.

There are several regions in British Columbia that have bans in place and it will be important to seek their input on the effectiveness of the bans, and identify what has worked well and what hasn’t, applying that input to inform the development of a province-wide ban.

For example, at Metro Vancouver disposal facilities, loads are inspected for banned materials that should not be in the garbage, such as recyclable materials. There are financial implications for banned materials that are landfilled, including a minimum \$73 surcharge, plus the potential cost of removal, clean-up or remediation applied to loads containing banned hazardous and operational impact materials or product stewardship materials; there is also a surcharge of 50% of the tipping fee on the entire load applied to loads containing banned recyclable materials<sup>2</sup>. We understand such financial charges vary across regions and jurisdictions and it would be helpful to gather more information to determine appropriate fees. But to truly promote recycling, there must be an economic incentive to make recycling less expensive and more incentivized than landfilling.

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<sup>2</sup> Metro Vancouver Disposal Ban Program. <https://metrovancover.org/services/solid-waste/disposal-ban-program>

## Standardized management actions and data sharing for businesses and institutions

PPEC supports the proposal to consider having businesses and institutions adopt specific waste prevention actions, conduct audits, and share data so long as it is aggregated to protect confidential company information and made available publicly.

However, we would encourage the government to look to other jurisdictions who have introduced similar actions to help inform any future decisions.

### Learning from Ontario's 3Rs Regulations

The Province of Ontario has regulations to oversee waste reduction and diversion in the IC&I sector under the *Environmental Protection Act*: the Waste Audit Regulation (O. Reg. 102/94) requires large establishments that meet size thresholds to take an inventory of their waste and have waste reduction plans in place; and the Source Separation Regulation (O. Reg 103/94) requires establishments to separately collect specified materials to be recycled or reused.

Despite being in place since 1994, these regulations have not been effective. PPEC encourages the B.C. government to learn from Ontario's experience so that any new requirements for B.C. businesses and institutions will be achieve their intention, unlike Ontario's experience.

There are several lessons learned in Ontario of why the 3Rs Regulations have not been effective, as documented by the Auditor General of Ontario in its Value for Money Audit report related to waste reduction in the IC&I sector<sup>3</sup> which found that:

- The regulations apply to less than 2% of IC&I entities, which means that 98% of Ontario IC&I establishments have no obligations and are not required to recycle.
- Waste management service providers, such as waste collectors, transfer stations and sorting facilities, are not required to divert the IC&I waste they handle.
- Waste management service providers regularly send collected IC&I source-separated recyclables to landfill because materials are too heavily contaminated; the cost of diverting materials can be up to six times higher than the cost of landfilling them; and there is a lack of end markets (processors and manufacturers) interested in buying the materials.
- The regulations have not been updated since being introduced in 1994 so they exclude many packaging material types that are now common.
- There is a lack of data and accountability as the Ontario Ministry does not compile or publish information about waste management companies' operations, such as their diversion rates, the types of materials they divert, or what they do with the materials they handle.
- Regulated establishments are required to operate a recycling program and to make "reasonable efforts" to collect and divert recyclable waste. With no requirement to achieve a specific outcome, and no government measures to support diversion (ie. landfill bans, landfill levies, applying surcharges), diversion rates varied widely from 6% to 90 per cent.

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<sup>3</sup> Auditor General of Ontario. Value for Money Audit: Non-Hazardous Waste Reduction in the Industrial, Commercial and Institutional (IC&I) Sector (November 2021).

[https://www.auditor.on.ca/en/content/annualreports/arreports/en21/ENV\\_ICI\\_en21.pdf](https://www.auditor.on.ca/en/content/annualreports/arreports/en21/ENV_ICI_en21.pdf)



If B.C. is interested in having businesses and institutions adopt specific waste prevention actions they should learn from the Ontario experience. While IC&I establishments in Ontario may be taking actions to separate their materials with the intention of being recycled, materials may not make it past the transfer station to a processor to be recycled. The recycling value chain is complex and involves many other players – not just the institutions where waste is generated. Governments must recognize, and hold accountable, others along the value chain – collectors, transfer stations, processors, etc. – to ensure all players are doing their part to properly divert waste from landfill.

The government also has an important role to play in overseeing any new business requirements by dedicating resources to enforcement and compliance; introducing corresponding measures to help support diversion and create economic incentives that promote recycling over landfilling; and require accountability and aggregate data sharing for those that are involved in the collection, management and recycling of recyclables and waste.

The Auditor General of Ontario's Value for Money Audit report contains 17 recommendations, with 38 action items, to address its audit findings that may be helpful for the B.C. government to review as it considers next steps with this proposal.

#### Standards for waste management companies

It may also be helpful to consider the possibility of provincial standards for waste management companies aimed at ensuring high quality materials for recycling. Given that materials intended for recycling are sometimes turned away at transfer stations or lost at other points along the journey from collection to recycling, it would be helpful to review and better understand existing waste management company practices and standards related to quality of materials and preventing contamination.

Are there acceptable levels of contamination, moisture content, and other factors that impact the quality and marketability of recycled materials? Would monitoring and auditing of waste management operations help verify compliance with standards and identify areas for improvement across every touchpoint within the process?

Additionally, given learnings in Ontario, and anecdotal discussions with industry stakeholders, consideration should be given for a role for the government to work with waste management and recycling companies to help promote guidance that supports better recycling outcomes.

While we recognize the government's Discussion Paper considers standardization for business and commercial entities' potential waste reduction plans, we reiterate the importance of holding players across the entire recycling value chain accountable to their part in the process. To that end, it is important to consider the role of waste management companies, and the opportunities for potential standards or best practices related to preventing contamination and quality of materials needed for processing and end markets, to achieve higher rates of waste diversion in the non-residential sector.

#### **Extended Producer Responsibility**

The Discussion Paper proposes a few options for expanding Extended Producer Responsibility (EPR) from more sources or for a specific sector.

While PPEC supports efforts to increase recycling and waste diversion, and consultations are an important way to have informed discussions, we generally do not support an EPR policy approach for managing recyclables in the IC&I sector.

To date, Quebec is the only Canadian province to expand EPR into the IC&I sector as part of the province's move to modernize its recycling system. While Quebec is phasing in the expansion – beginning with schools, outdoor public areas, and similar IC&I establishments (defined as “comparable, in nature and quantity, to those meant for the residential sector”<sup>4</sup>) in 2025, and the rest of the sector expanded by 2030 – there are many uncertainties and unanswered questions about how EPR for IC&I will work in Quebec, including what the fees will be, how materials will be managed, and how existing waste management and recycling contracts will be impacted.

Quebec is implementing this precedent-setting approach as it also works to transition its current residential recycling program for packaging and paper products to a true EPR approach, much like many other provinces are currently doing.

Which is another reason why PPEC urges the B.C. government to reconsider the proposal to apply EPR to the IC&I sector.

In many ways, EPR for residential paper and packaging is in its infancy in Canada. While we have had legislated programs in place for years, decades even, British Columbia is the only province with a true EPR model. Most provinces are either in the process of developing or transitioning to full producer responsibility models, where producers fund and operate recycling programs, from existing program models where producers only fund the costs of programs operated by municipalities.

PPEC has high expectations for what true EPR could achieve for Canadian residential recycling programs including:

- Harmonization of programs with the goal of achieving economies of scale and greater efficiencies.
- Established end markets so collected materials can be sold and recycled.
- Improved consumer education and participation in properly separating and preparing recyclables.
- Less contamination and a better supply of cleaner materials.
- Higher recycling rates.
- More consistent, reliable, and comparable recycling data that is made publicly available.

It will take time to see if this shift to true EPR results in higher recycling rates and program efficiencies, and it is important to provide the necessary time to learn from these changes.

It is also important to recognize that the IC&I sector is different than the residential sector. One side features waste and recyclables collected from homes and apartments; while the other generates materials from a variety of distinct locations including manufacturing facilities, retail and grocery stores, malls, restaurants, offices, hotels, stadiums, airports, schools, hospitals, transit, etc.

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<sup>4</sup> Éco Entreprises Québec. Reporting of Materials for Institutions, Commerces and Industries (IC&I): What You Need to Know, slide 10. Webinar held on February 21, 2024. [https://www.eeq.ca/wp-content/uploads/Webinaire\\_ICI\\_20\\_fevrier\\_2024\\_ANG-1.pdf](https://www.eeq.ca/wp-content/uploads/Webinaire_ICI_20_fevrier_2024_ANG-1.pdf)

In the IC&I sector, businesses are responsible for managing their own waste and recyclables, and typically businesses contract directly with waste management service providers. But we understand that not all establishments necessarily do that, and even with those that do, there are challenges with recycling the materials once collected – such as transfer stations not accepting collected materials, high contamination rates, and lack of available end markets to sell the materials, to name a few.

But when it comes to paper packaging, PPEC member companies are already taking responsibility by promoting the use of recycled content and acting as end markets by buying back used cardboard and paper materials from grocery stores and other commercial entities. Paper fibers are being successfully recycled in the IC&I sector, allowing those materials to be responsibly recycled and reused to make new paper packaging products.

Differences in where materials come from need to be taken into consideration when looking for solutions to increasing waste diversion in the IC&I sector, as they can have impacts on how materials are collected, managed, and ultimately recycled.

That said, we recognize that some stakeholders are discussing the potential application of an EPR approach to specific sectors within IC&I, such as schools, and where opportunities and synergies may exist to collect high quality materials. PPEC supports measures that foster efficient local recycling and improves recycling rates; we encourage policy approaches that are grounded in data, and we are open to engage in further discussions on this topic.

## **Timing**

While PPEC understands that the Government of British Columbia has made a commitment to identify a policy approach for non-residential packaging and paper products in 2025, as outlined in *Advancing Recycling in B.C.*, its five-year EPR action plan, PPEC recommends that the government reconsider these timelines due to forthcoming new information.

New research is expected to be published this year which will include updated information and recycling data that may be helpful to inform B.C.'s decisions.

We are aware that Environment and Climate Change Canada is updating its National Waste Characterization Report; new IC&I recycling data is being gathered and analyzed from the Canada Plastics Pact; and a new report entitled *Baselining Generation, Disposal and Diversion of PPP* is forthcoming from Circular Innovation Council.

In addition to the above, this year PPEC participated in Environment and Climate Change Canada's National Working Group on Post Consumer Fiber to help the federal government better understand the state of fiber recycling. One of the areas of discussion included the IC&I sector, with a proposed opportunity identified to consider undertaking a study to assess gaps in participation in EPR and the pros and cons of including the IC&I sector in EPR. The Working Group's efforts are currently being used in the development of a new study, *Taking Stock of Paper Waste and Recycling in Canada*, to be published by ECCC later this year.

Recognizing that there are several new pieces of research expected to be published this year, PPEC recommends that the British Columbia government reconsider its timelines to be able to ensure it has the necessary time to consider any new information and data.

July 22, 2024

File: CR-24-03

Circular Communities  
Environmental Policy & Initiatives Branch  
Ministry of Environment and Climate Change Strategy  
PO Box 9339 STN PROV GOVT  
Victoria, BC V8W 9M1  
**VIA EMAIL:** [CircularCommunities@gov.bc.ca](mailto:CircularCommunities@gov.bc.ca)

Dear Circular Communities Team:

### **Preventing Waste in British Columbia**

Thank you for the opportunity to provide feedback on *Preventing Waste in British Columbia: Non-Residential Packaging & Paper Products Discussion Paper*. This submission provides Metro Vancouver staff feedback on some key issues with the approaches highlighted below, and a blend of policy options and best practices are recommended to address the diversity and amount of recyclable, compostable and reusable packaging and paper product generated in the non-residential sector. The draft letter was shared with Metro Vancouver member municipal solid waste staff for feedback and comment.

#### **EXECUTIVE SUMMARY**

Non-residential recycling and waste prevention, as described in the document *Preventing Waste in British Columbia: Non-Residential Packaging & Paper Products Discussion Paper*, can be variable in scale and scope. As a result, a number of policy approaches and best practices may be needed to make progress towards reducing waste. This submission provides commentary on several of these options.

- Desired outcomes of non-residential packaging regulation: Principles for guiding the management of non-residential packaging should address the following items, inclusivity, accountability, transparency in material flows, collaboration, innovation, affordability and resilience to climate change and future challenges.
- Setting ambitious targets: The non-residential sector should have ambitious targets, including a phased approach to implementing reuse targets.
- Addressing data gaps to inform policy and program development: More work is required to determine and implement data collection and reporting requirements for all sectors, including annual reporting on performance targets.
- A targeted approach to extended producer responsibility: A targeted, phased-in approach to extended producer responsibility is preferable to address institutional sectors which produce material indistinguishable from existing packaging programs or to facilitate collection of specialized packaging types from all sectors.

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- Reuse requirements: Province-wide solutions for reuse have the potential to prevent waste and provide the lowest carbon solution for packaging, while reducing customer confusion and maximizing efficiency for business.
- Provincial data standardization and sharing: Identification of data needs is required to understand reuse, refill, repair, remanufacturing and recycling activities and make the necessary investments in tracking and reporting these activities.
- Standardized waste prevention and management actions: Work with targeted businesses to standardize materials management plans, looking at reuse, refill, remanufacturing, recycling and responsible disposal targets, and reporting.
- List of designated materials: Elimination of hard-to-recycle materials is important to reduce contamination and reduce consumer confusion.
- Disposal bans: Focus Provincial efforts related to disposal bans on supporting local government policy and regulatory processes, and not unintentionally undermining local government programs.
- Other regulatory measures: Modernize Provincial legislative tools to facilitate more streamlined implementation of local government solid waste regulatory measures.

### **OUTCOMES, TARGETS AND DATA NEEDS FOR THE NON-RESIDENTIAL SECTOR**

Regardless of the policy options pursued, they should strive to follow key principles, push for ambitious targets and continuous improvement, improve understanding and address data gaps to better inform priority policies. To leverage the considerable efforts required to implement new programs and policies, it will be important to select the ones with significant social, environment and financial benefits.

#### **Desired outcomes of non-residential packaging regulation**

The proposed desired outcomes for improving management of non-residential packaging outlined in the discussion paper, align with Metro Vancouver priorities of the pollution prevention hierarchy. They also generally align with the vision and guiding principles for an updated solid waste management plan approved by the Metro Vancouver Board on June 28, 2024, which were arrived at through collaborative engagement with industry and the public, and highlight the need for inclusivity, accountability, transparency in material flows, collaboration, innovation, affordability and resilience to climate change and future challenges.

Preference for reuse, refill and repair over recycling are key priorities for all sectors as all levels of government strive to move materials management practices up the pollution prevention hierarchy.

#### **Setting ambitious targets**

The non-residential sector should have more ambitious targets than the residential sector, especially for reuse since producers/businesses in the non-residential sector have greater ability to influence design and implement systems (e.g., closed-loop supply chains) to support reuse. Further, the benefits are expected to be even more pronounced in business-to-business logistics, due to the continuous cycling of transportation between facilities. For business-to-consumer transactions, recycling targets in-line with the existing residential packaging and paper product program are suitable. Developing a phased approach to implementing reuse targets for the non-residential sector is an important area of focus. Minimum reuse targets can help stimulate innovation and create local green jobs at the top of the pollution prevention hierarchy, reduce waste and generally result in lower climate impacts. Research by

Eunomia for Reuse Minnesota (a state with a similar population to BC) found the Minnesota reuse economy already creates between \$3.1 and \$4.7 billion in revenue, 36,000-54,000 jobs and avoids 500,000 metric tons of carbon dioxide equivalent emissions per year.

Wording of targets matter, for example, a commonly adopted target of “100% of packaging is reusable, recyclable or compostable by a specified date”, can result in confusion about the relative ranking of compostable compared to recyclable or reusable. Separate reuse and recycling targets for specific materials are preferable. Compostable or recyclable containers are single-use items that take up energy and materials to produce, and should be used for a narrow scope of application where they provide benefits to circular food systems in BC.

### **Addressing data gaps to inform policy and program development**

Metro Vancouver generates data regarding the commercial/institutional sector through waste composition studies, disposal tonnage tracking and licensed recycling facility reporting. These data, along with extended producer responsibility program annual reports and data from non-licensed facilities, are summarized in Metro Vancouver’s solid waste annual report. In general, these annual reports demonstrate residential recycling programs perform well in our region, but commercial and institutional recycling needs improvement. Metro Vancouver’s 2023 Commercial/Institutional Waste Composition Study continued to show variability. However, it is notable that the top three components of waste across the three sectors continue to be organics, paper, and plastic. Together, these materials make up approximately 90% of garbage in retail and wholesale trade, business and commercial services (offices) and food services. Recycling programs within non-residential operations generate very large amounts of fibre, far beyond the amounts of other types of recyclable materials. Further, many reuse programs already exist, especially where wholesale/distribution centres, retailers, and consumers all exist within close proximity to one another. Examples of this type of packaging reuse include bread trays, milk crates, beverage trays, and produce containers. Further examples of packaging reuse include wooden pallets, bulk containers, totes, drums, and pressurized containers.

However, a better understanding is required for the circularity of specific applications such as reuse, polycoat coffee cups, unnecessary plastics, and banned or restricted plastics. More work needs to be done to determine and implement data collection and reporting requirements for all sectors, for the purpose of developing a better understanding of circular materials performance.

Reporting on performance targets should be undertaken on an annual basis. Additionally, impacts of non-residential packaging and paper product outside of these defined systems should be undertaken and reported at a prescribed frequency (e.g., conducting unaccounted-for product studies or waste characterization studies every three years).

### **POLICIES TO ADVANCE WASTE PREVENTION OUTSIDE THE HOME**

The approach outlined in *Preventing Waste in British Columbia*, to utilize a number of policy options to improve the collection and recycling of packaging and paper product, is sound and recognizes that different non-residential sources have different priorities and challenges. No one solution will achieve all objectives.

### **A targeted approach to extended producer responsibility**

Extended producer responsibility regulation for packaging and paper product for the non-residential sector needs to be carefully considered to ensure that implementation does not result in unintended consequences related to reducing competition and innovation. A targeted, phased-in approach is preferable. There is opportunity to adopt targeted application of extended producer responsibility regulation to address institutional sectors which produce material indistinguishable from the existing residential program (e.g., schools and senior care homes), or to facilitate collection of specialized and packaging types from all sectors (e.g., coffee cups, polystyrene foam and corrugated cardboard). Schools have challenges implementing and managing recycling programs and would welcome a province-wide approach. Customers at Metro Vancouver recycling and waste centres experience confusion and frustration when small loads of foam and flexible plastic delivered in commercial vehicles are rejected because of Recycle BC's narrow interpretation of the Recycling Regulation requirements.

In addition, regional districts own and manage parks which serve the public in a manner indistinguishable to municipal parks. Producer funded streetscape collection programs should be extended to regional district parks as well as other similar public spaces.

### **Reuse requirements**

Wide-scale reuse programs have the potential to prevent waste and provide the lowest carbon solution for packaging. The City of Victoria's proposed reuse actions, which start with requirements for dine-in, is a great example of a first step for reuse policies. Metro Vancouver encourages the Ministry of Environment and Climate Change Strategy to allow leading local governments to pilot reuse requirements starting with reuse for dine-in, then reuse for events, then reuse for take-out and reuse for business-to-business packaging. Once the viability of these approaches has been established, it is best if they are implemented province-wide shortly after they are piloted and demonstrated successful by a few leading local governments, to prevent a patchwork of policies in individual municipalities. Province-wide harmonization also reduces confusion for customers and maximizes efficiency for business.

Similar to the transition to clean energy, switching from disposal to reusable will have capital investment implications for small business. Rebate and grant programs should be developed to support businesses to retrofit spaces to fit dishwashing, purchase dishwashers and purchase durable food service ware.

### **Provincial data standardization and sharing**

One challenge with the existing extended producer responsibility program data is the level of detail at which the producers report. For example, Recycle BC has a detailed list of producer's fees and, therefore, likely tracks data to a corresponding level of detail, yet reports only broad categories, such as paper and plastic. As a result, it can be challenging for interested parties to understand the success of program, policy and education efforts targeted at specific items such as coffee cups. Information for all 9R's of circular economy materials management (Refuse, Rethink, Reduce, Re-use, Repair, Refurbish, Remanufacture, Repurpose, Recycle, recover) is challenging to obtain. The Ministry of Environment and Climate Change Strategy is encouraged to work with local governments, non-profits and businesses to identify data needs to understand reuse, refill, repair, remanufacturing and recycling and make the necessary investments in tracking and reporting these activities. For the non-residential sector, systems to accurately measure data need to be piloted and then scaled up.

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**Standardized waste prevention and management actions**

Metro Vancouver supports the federal pollution prevention program to help large grocery retailers in Canada eliminate unnecessary plastic packaging and transition to reusable, fillable, recyclable and compostable packaging formats by 2030. At a provincial level, working with targeted businesses to standardize materials management plans, which look at reuse, refill, remanufacturing, recycling and responsible disposal targets and reporting, could significantly improve the non-residential waste prevention performance in BC. New technologies, such as sensors that provide real-time bin weights and innovative multi-tenant recycling and waste measurement and monitoring systems, provide improved data and reporting opportunities for the commercial and institutional sectors. More work needs to be done to pilot these technologies and determine how best to integrate reuse and refill options. Following a data collection pilot, education and plans with priority sectors is recommended as a first step to inform phased-in requirements for standardized waste prevention and management actions.

**List of designated materials**

Elimination of hard-to-recycle materials is important to reduce contamination and reduce consumer confusion. Some packaging materials and formats, such as mono-material flexible films, are widely debated in terms of if they have an overall system benefit. There are emerging lists of materials, such as those compiled through global Plastic Pacts, that identify those that are widely understood to be problematic. There is an opportunity to accelerate the adoption of these voluntary elimination lists through policies that build on existing provincial restrictions on oxo-degradable, biodegradable and compostable plastics. Consider policies which look to accelerate adoption of industry best practices such as the golden design rules and American Plastics Recyclers design for recyclability. Required adoption of these standards could help level the playing field for industry players that are already incorporating recycling outcomes into their packaging decisions.

For some materials, focusing on packaging performance and outcomes in consultation with industry and government may be an effective approach. For example, material put on the market should provide disclosure of all constituents that make the product and packaging and have a clear plan for how it can be managed in existing infrastructure or infrastructure that industry plans to utilize within a 5-10 year horizon.

Life cycle analysis research shows that material type is not a good proxy for environmental performance. Environmental performance varies depending on how product and packaging made and how they are managed during their lifespan. Therefore, clean production and recycling processing (such as low carbon, targeted green chemical processes) of all designated materials should be a consideration for policies that narrow the scope of materials options for industry.

**Disposal bans**

Disposal bans are an important tool to encourage recycling of materials with viable recycling markets. Provincial actions related to disposal bans should be restricted to efforts to support local government regulatory processes and must not undermine local government programs. The Province, for example, could establish a list of materials for regional districts to target through local government disposal bans, and direct regional districts through the solid waste management planning process to develop action



plans to review the potential for disposal bans for each of the designated materials given local circumstances.

**Other regulatory measures**

The Ministry of Environment and Climate Change Strategy should consider modernizing the Environmental Management Act to remove requirements for approval of the Minister of Environment and Climate Change Strategy of solid waste bylaws. The current process of Ministerial approval of individual bylaws results in unreasonable delays in the approval of bylaws. For example, the Nanaimo Regional District's hauler licensing bylaw was approved more than five years after the Nanaimo Regional District Board approved its solid waste management plan. Delays in implementation of important regulatory instruments such as Nanaimo's hauler licensing bylaw impact regional districts' abilities to achieve their zero waste and circular economy goals.

Please do not hesitate to reach out if you would like to discuss any of these topics.

Sincerely,



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

PH/CU/ad

## EcoSafe Zero Waste Inc.'s Response to "Preventing Waste in British Columbia: Non-Residential Packaging & Paper Products" Discussion Paper

### 1. Are there any desired outcomes missing from this list?

A desired outcome missing from this list is an emphasis on composting for items that cannot switch to reusables as an alternative. Composting is one such option that deserves more attention by the province of British Columbia. Unlike plastics and plastic recycling, compost is a zero-waste solution that has a consistent demand for improving soil degradation.

Composting can encompass not only food and garden waste but also increasingly new forms of compostable plastics and packaging. The prevention-first approach of "recycling over energy recovery or disposal" should factor that food scraps, known as food waste, is unavoidable in the food service industry and will need to be looked at differently than recycling. 19% of B.C.'s landfill's contain food waste, and since food scrap collection tools such as compostable bags cannot be reused or recycled, then they can and should be composted.

Alongside that, compost infrastructure must be a focus. Technologies that capture food scraps with compostables should be prioritized. Keeping food out of landfills is a major part of implementing a circular system that provides enhanced economic stability and environmental benefits. Businesses should be encouraged to separate organics from other waste streams, and encouraged in a way that is easy and efficient for their workforce.

According to [Waste 360](#), "Composting adds stability to circular waste management; a main advantage is the steady demand for the valuable end product it creates." Organic waste from urban cities requires certified compostable bags as a tool for the benefits of transportation, cleanliness, odour and pest control.

To date, the B.C. government has not acknowledged the work that EcoSafe does with current haulers around the province. EcoSafe's ICI clients range from organic waste haulers, restaurants, and multi-residential buildings. We supply certified compostable liners, bins, and in some cases signage to support food scrap collection programs for both front-of-house and back-of-house. We manufacture a wide range of our products in Canada and provide green jobs to a thoughtful team in Surrey, B.C.

A good example where we see success is in the Okanagan and Shuswap area where Spa Hills Compost uses EcoSafe certified compostable products in both their hauling servicing and compost processing. It is not a matter of whether certified compostable film products can decompose, it is whether the government will update compost regulations, standardize labelling guidelines, and implement other policies to deem acceptance of our composter-approved products (certified by both the BPI and the Compost Manufacturing Alliance).

Compost processing technology, such as Green Mountain Technologies, who have been funded by the Organics Infrastructure Program (OIP) and CleanBC Organics Infrastructure and Collection Program (OICP) in B.C.'s First Nation communities, accept and successfully compost certified compostable products. Additionally, EcoSafe certified compostable film products are more likely to decompose in a timeframe that works for most composters, as noted in a recent [Closed Loop report](#).

Haulers across British Columbia, Canada, and the United States use EcoSafe certified compostable bags as a tool to efficiently collect food scraps in the food service industry. We are the bag of choice for the [Circular Innovation Council](#), who recently launched a new institutional, commercial, and industrial (IC&I) food rescue and organic waste diversion pilot.

Our client Charlie from O-town Compost, a community composter and hauler from Florida, has reviewed our compostable liners, and claims that *“Compostable bags are the key to increasing participation among residents and businesses who are looking for a yuk-free method of food waste diversion. The majority of people don't want to be rinsing their bins, so it leads to a greater volume of feedstock going to the compost site. The bags are neutral in the composting process, and disappear in a couple of days, allowing the microbes to work their magic.”*

A next step and desired outcome is to have open dialogue and more opportunity to collaborate with the B.C. government. We invite as a local partner in food scrap collection programs as our team has helped thousands of ICI customers with their food scrap collection needs, such as major local haulers like AJM Disposal, Waste Management, GFL, BC Ferries, UBC, Royal Roads University, to name a few. Alongside that, certified compostable film products that are common contaminants for composters, such as gloves, cling film, checkout bags, and grocery produce bags, should be seen as an innovative solution as they use the same components as our compostable bags for organic waste collection.

## **2. What outcomes are most relevant to your business, organization, or community?**

The outcomes that are most relevant to EcoSafe Zero Waste Inc. are addressing issues of contamination for composters, reducing food waste in landfill for our food service clients, and banning look-a-like mislabelled “biodegradable” or compostable products.

As a compostable company based in Surrey that is making an impact across North America through our certified compostable liners, we have worked directly with British Columbian waste haulers and support British Columbians with a switch to compostable items that would otherwise be deemed as a challenge for recycling systems.

We want to see the B.C. government work alongside local businesses that provide compostables, and partner with EcoSafe Zero Waste to help ensure that multi-family homes, waste haulers, restaurants and other food service sectors use compliant, certified compostable film products that are successful in the industrial composting process.

Easing confusion for the ICI sector with compostables must be paired with policy and regulation that ensures mislabelled and non-compliant, non-certified “biodegradable” bags and other such products are taken off the market and labelling standards are put in place to avoid misleading consumers with vague claims that are not certified to specific standards. [BPI](#) certified [CMA](#) field-tested bags such as EcoSafe's should be the only products allowed in the market to ensure that food service clients aren't buying the wrong items.

After a recent site visit to the very successful Comox Strathcona Organics facility, their hesitancy to accept ICI organic waste is valid due to concern of contamination. Currently, they don't accept compostable bags even in their residential program and even if they did, they wouldn't know which bags to accept. There is a ton of opportunity for EcoSafe to assist with these complications as we are certified across all types of commercial compost facilities due to our CMA field-tested certifications.

### **3. How would you prioritize these outcomes?**

Like Metro Vancouver, the province should place a disposal ban on organic materials to landfill. Metro Vancouver accepts compostable liners for ICI but not residential, which is confusing for multi-unit residential clients, a challenging sector that needs assistance managing waste. We suggest providing the ICI sector with Composting Guidelines that would support the food service sector with source separation best practices.

Collaboration and working together to support a circular economy model with a systems-thinking mindset is a priority. Policy makers should support legislation that promotes compostable products and infrastructure instead of hindering Canadian innovation.

Since Canada's labelling guidelines have not been passed into regulation yet, compostable products that have a Biodegradable Products Institute and Compost Manufacturing Alliance certification should be approved and promoted by the B.C. government. To serve each of consumers, haulers, and composters, EcoSafe certified compostable bags should be the "bag of choice" and be provided to help standardize and ease confusion for waste generators of all kinds.

Additionally, newcomers to Canada, students in schools, and food service providers should complete a standardized educational program that educates on how to source separate waste appropriately in the province.

### **4. Are there indicators or measures of success you would suggest are used to determine if an outcome is achieved or is achievable?**

A measure of success to determine an achievable outcome through accepting compostables in source separation programs would be based on quantifying the decrease of food waste ending up in landfill. Measuring the effectiveness of using compostables in food service could be measured by using the EcoSafe Zero app, a measurement tool for waste generators to calculate the amount of food waste diverted and reductions in greenhouse gases. We are currently looking for partners and this could be a positive opportunity to work together.

### **5. Should non-residential packaging targets be the same, or better than existing residential packaging targets? Why or why not?**

Non-residential packaging targets need to be considerate of the systems that are in place based on each user. For example, Subway restaurants currently use thousands if not millions of disposable plastic gloves for making sandwiches per day. A reusable alternative does not exist.

Often non-residential packaging is used for food safety reasons. EcoSafe certified compostable gloves solve issues related to food and health safety because of food contact, and our certified compostable gloves are a natural fit for food waste streams that can be composted with organic materials. The micro-systems that each food service client has is unique, so targets must account for the different systems that exist.

An example of a supporting packaging target would be to provide 100% of food service clients with effective composting infrastructure that includes a map of what items can be used within a jurisdiction based on the infrastructure available. For example, Whistler's waste system is different from Victoria's waste system, and so it would be worth setting targets to ensure that by a certain date, each community will have access to basic infrastructure that allows the circular economy to thrive.

**6. What types of targets would be most useful? Reduction targets; reuse targets; recycling targets; diversion targets?**

Composting and soil health targets would be helpful, especially in conjunction with improving healthy soil practices through the use of compost in agriculture and municipal city gardens. The Government of Canada is currently developing a long-term overarching strategy to protect and conserve soil throughout Canada based on the [Critical Ground: Why Soil is Essential to Canada's Economic, Environmental, Human, and Social Health](#) report. Pairing composting with soil health is a critical next step for B.C. to consider at this stage.

**7. Should there be regional or business specific targets in addition to provincial targets? Why or why not?**

Yes, see answer above. Due to differentiating systems across the province, targets need to consider those systematic differences and find a path for future alignment.

**8. How can we measure success or progress against established targets?**

See answer to Question 4.

**9. What actions are best suited at the local, regional, or provincial level of government?**

Local: Provide educational programs about soil health and compost; supplying certified compostable bags and liners that are compliant and certified compostable.

Regional: Provide catalogue of local certified compostable companies that the ICI sector can trust and purchase from.

Provincial: Provide funding and planning for future composting infrastructure. Compost infrastructure and building a system that helps to capture food waste as a resource recovery

strategy for healthy soil, using compostables as the capturing tool is critical; Launch a complaint portal for mislabelled items that are not compostable similar to what Colorado has done after passing a labelling law that established compostable products must be certified to ASTM D6400 standards, and for non-compostables to be penalized if they use misleading terminology/symbols/claims of compostability without certification.

**10. What factors should be taken into consideration if the Province enables or promotes local actions?**

Local actions must be hyper local and there each jurisdiction should look at the system that is in place and consider the funding it will take to build appropriate compost infrastructure in that region. The province should factor that composters and haulers employ thousands of drivers, equipment operators, facilities managers and many other types of jobs. Haulers save on water usage by using compostable liners in their collection services, and it can serve as a revenue generator for haulers. Recycling seems to be favoured but BPI-certified compostables are non-toxic and use mostly natural processing in the composting phase bringing the province some economic savings.

**11. What is already working to prevent packaging waste - for businesses, institutions, haulers, local governments?**

Accepting BPI certified compostable bags across the province, such as in the Capital Regional District, is already working as many haulers use EcoSafe bags in their collection bins.

**12. Are there other actions that should be considered? What are they?**

Other actions that should be considered is to accept other certified and easily identified compostable film products that EcoSafe offers such as checkout bags, produce bags, gloves, cling film, sandwich bags, etc. as they are made from the exact same resin as our bags that are currently accepted in compost systems.

Recently, the federal ban on single-use plastics banned compostable checkout bags, which is a shame because they have a definitive end-of-life compared to most reusable bags in the market and they truly are not single-use as they can be used to keep kitchen bins and residential carts clean. There is too much incongruence amongst regulations that is confusing the food service industry who don't have the time to sort these challenges.

**13. What are the benefits or limitations of these waste prevention options?**

The benefits of these waste prevention options are that it creates a standardization of products to align the ICI sector with compliant products that allow organizations to easily onboard and implement food scrap collection processes that are desperately needed at a faster pace than what is occurring today.

The limitation is that the public does not understand the time of transition we are currently in, and media outlets tend to spread fear about using compostable products due to the

greenwashing look-a-like and fake compostable products. Companies like EcoSafe should be celebrated for sustainable innovation, providing green jobs, trying to educate the public and our customers and supporting ethical manufacturing; not penalized for the 20+ years of work that have gone into providing clean, easy and efficient food waste collection.

#### **14. How ready are organizations, businesses, governments to implement?**

EcoSafe believes that organizations and businesses are willing to do this, but the government regulations are causing confusion on what can and cannot be accepted. More funding should go to supporting the food service sector who often can't afford startup costs to separate organic waste from other waste.

#### **15. How should implementation be prioritized?**

Implementation should be prioritized through an increase in composting infrastructure, a ban on food to landfill, standardized and regulated compostable products and labelling for products support for green jobs by supporting B.C.'s compostable product manufacturers, providing grants to community composters who want to start a compost business, and encouragement for businesses of all kinds to work with partners like EcoSafe to start food scrap collection programs.

EPR principles for compostables, as suggested by the US Compost Council and the Biodegradable Products Institute should meet the following criteria:

- A proportional share/amount of revenue, based on existing compostable products and nonrecyclable items that could be reasonably redesigned to be compostable, must be allocated to organics recycling programs for the successful collection and processing of compostables, as well as education focused on maximizing diversion and minimizing contamination.
- The EPR fees must cover all materials. All compostables are defined as a class (not by material), certified defined by a common performance criterion including but not limited to ASTM D6400 and ASTM D6868.
- Certified compostables are items or packaging that are designed to be associated with food scraps (e.g., food-soiled items) or yard waste and be collected in a source separated organics stream (e.g. food scraps), not co-collected with recyclables or other mixed waste destined for landfill.
- There must be representation from the certified compostable products and compost manufacturing industries, at state advisory councils/boards, as well as at a broader producer responsibility organization (PRO) or in a separate PRO for compostables.
- Compostables must be exempt from post-consumer recycled content (PCR) requirements, as these materials are recycled into compost.
- Since compostables are not collected/processed on their own like recyclables, compatibility with existing sister policy/goals on food waste collection and composting should be considered, or new organics recycling policy development is strongly recommended, since compostables are not collected/processed on their own like recyclables.
- If eco-modulation\* is included, fees for certified compostable products should be relevant to composting, not recycling or landfill/incineration, since they are collected, processed,

and recovered separately. Fraudulent claims of compostability and other greenwashing around “biodegradable” consumer products should be considered potential disruptors to composting.

\*Eco-Modulation: A varied fee based on the ease/likelihood of recyclability/compostability

**16. What are the benefits or limitations of expanded EPR options?**

The benefits that EPR expansion has is that it rewards participation, incentivizes investment, and makes it easier for end users to understand what is an isn’t compostable.

**17. How ready are organizations, businesses, and governments to implement an expanded form of EPR?**

When it comes to compostables, organizations are needing clear guidelines to know how to take the next step in food scrap collection, as well as the education and government regulation of actual contaminants in order to supply processors with clean, uncontaminated organics

**18. Are there sectors or materials that should be prioritized to be included or excluded?**

N/A

Thank you for taking our feedback! I look forward to hearing from you.

Sincerely,

Samantha Davies  
Sustainability Programs Manager  
EcoSafe Zero Waste Inc.  
[samantha@ecosafezerowaste.com](mailto:samantha@ecosafezerowaste.com)  
778-834-6518



Gwendolyn Lohbrunner  
Director, Circular Communities  
PO Box 9341 Stn Prov Govt  
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Dear Director Gwendolyn Lohbrunner,

The Resort Municipality of Whistler (RMOW) appreciates the opportunity to share feedback on the ‘Preventing Waste in British Columbia: Non-Residential Packaging and Paper Products’ discussion paper.

Overall, we are very supportive of regulations to better capture non-residential packaging and paper products for recycling.

### Discussion Questions

**1. Are there any desired outcomes missing from this list?**

The RMOW would like to see a stronger emphasis on reducing overall packaging use and decreasing material throughput, as historical data shows that increased diversion has been offset by increased consumption. In addition, equitable access to collection and recycling services for small communities outside urban areas should be ensured, with costs covered by producers rather than local government subsidies. Lastly, there should be a focus on driving change and reduction for hard-to-recycle items, instead of a focus on developing new recycling technologies.

**2. What outcomes are most relevant to your business, organization or community?**

All these outcomes are relevant to the Resort Municipality of Whistler.

**3. How would you prioritize these outcomes?**

The RMOW agrees with the order of priorities listed in the discussion paper.

**4. Are there indicators or measures of success you would suggest are used to determine if an outcome is achieved or is achievable?**

The following indicators and measures of success could be used:

- Total plastics usage data from the Plastics Registry, with similar information gathered for other materials such as plastic containing textiles. This should show a decreasing trend over time.
- Percentage of materials reused, recycled, or captured, including data on EPR program capture rates and materials not returned.
- Detailed breakdown of material types, focusing on design for reuse and recycling, as well as recycled content percentages for plastic, paper, glass, metal, etc.

- Packaging use per capita, with targets for reduction.
- Sector-specific packaging usage metrics to track industry-level progress.
- Reductions in virgin packaging material use.
- Metrics on reusable packaging adoption and average cycles of use.
- Total and per capita disposal rates for packaging materials.
- Overall waste disposal per capita, with decreasing targets over time.
- Number of ICI locations without three-stream waste sorting systems, aiming for reduction.
- Third-party verified reporting on material destinations, similar to but more stringent than existing EPR program requirements.
- Data on processing systems within BC, including number, types, and improvements over time.

**5. Should non-residential packaging targets be the same, or better than existing residential packaging targets? Why or why not?**

Non-residential packaging targets should be higher than existing residential packaging targets for several reasons:

- Current residential targets are insufficient. The 75% goal in the Recycling Regulation is static and outdated, as many programs have already surpassed this level.
- Higher targets drive innovation and improvement. Setting more ambitious goals for the non-residential sector can push for better practices and technologies.
- Greater control in ICI sector. The industrial, commercial, and institutional sector often has more centralized waste management, making higher targets more achievable.
- Learning from past experiences. Insights gained from the Multi-Material BC rollout can be applied to set and achieve higher targets in the non-residential sector.

We propose that the ultimate goal should be 100% capture of all packaging materials by 2035 with progressively increasing interim targets leading up to 2035. In addition, we would like to see targets regarding an absolute reduction in materials used.

**6. What types of targets would be most useful? Reduction targets; reuse targets; recycling targets; diversion targets?**

The most useful types of targets include reduction targets that are focused on decreasing overall packaging use, reuse targets, and recycling targets that include capture/collection rates and ultimate recycling rates that reflect materials being recycled into similar products. We would also like to see coverage targets that aim for 100% coverage of all businesses. Diversion targets should be reported but not set as primary goals as they can be misleading. The focus should be on actual reduction, reuse, and effective recycling.

**7. Should there be regional or business specific targets in addition to provincial targets? Why or why not?**

Yes, there should be regional and business specific targets in addition to provincial targets for several reasons. Sector-specific targets must exist as different industries produce varying types and amounts of packaging waste. Tailored targets can address unique challenges and opportunities within each sector. Regional targets must exist to ensure regional equity. Regional targets ensure that rural and remote areas receive adequate attention and services, not just urban centres.

**8. How can we measure success or progress against established targets?**

To effectively measure success and progress against established targets, the Province needs to significantly improve data collection and transparency.

**9. What actions are best suited at the local, regional, or provincial level of government?**

The Province should take the lead on several key actions to ensure consistency and efficiency across British Columbia. These include implementing province-wide disposal bans on certain materials and products, which would drive materials towards EPR programs and eliminate the need for local governments to enact individual bans. The province should also mandate waste hauler licensing and reporting, with anonymized data made public for all regions. Additionally, the Province should provide support for transitioning to reusable beverage and takeout ware systems province-wide.

Lastly, local governments should be granted the authority to create their own bylaws regarding solid waste matters without requiring individual provincial approval.

**10. What factors should be taken into consideration if the Province enables or promotes local actions?**

If the Province intends to implement policy soon, it should establish a framework that allows local governments to adopt the policy early, similar to what occurred for many single use items. In cases where the Province does not plan to take immediate action, the Province should empower local governments to regulate as they see fit within their jurisdiction. The Province should establish a policy working group that enables municipalities to experiment with different policies on various items, share collective wisdom and experiences and learn from each other's successes and challenges. In addition, the Province should ensure that local governments have access to necessary resources, information, and support to effectively implement and enforce new policies.

**11. What is already working to prevent packaging waste – for businesses, institutions, haulers, local governments?**

Several strategies are already effectively preventing packaging waste across different sectors. EPR for residential packaging and paper products, with mandatory reporting and third-party audits, has established a verifiable program where producers bear significant costs. Product bans at various regulatory levels have proven effective and could be expanded, while disposal bans, and three-stream sorting requirements are also having a positive impact. At the municipal level, requiring businesses to create solid



waste management plans as part of their licensing process has ensured more responsible waste management. Voluntary actions by some businesses and industries have shown promise, though regulation is needed to level the playing field.

**12. Are there other actions that should be considered? What are they?**

Several additional actions should be considered to further prevent packaging waste and improve waste management in the ICI sector. First, extending EPR to ICI packaging and paper products is crucial for comprehensive waste reduction. Implementing additional taxes on problematic products or materials could discourage their use and incentivize more sustainable alternatives. Mandating three-stream (or more) collection systems across all sectors would significantly improve waste sorting and recycling rates. To enhance data collection and reporting, supporting the installation of cameras and scales on hauler trucks could provide more accurate and detailed information about waste generation and disposal patterns. Finally, developing a comprehensive provincial education and communications system focused on waste reduction and proper disposal outcomes would raise awareness and promote better waste management practices among businesses, institutions, and the general public.

**13. What are the benefits or limitations of these waste prevention options?**

We need all of these waste prevention options. EPR is not meant to be a stand-alone solution but part of a suite of policy that drives design and production in the right direction, helping to internalize many of the costs currently externalized today. We cannot just continue with siloed action but instead must implement a comprehensive, systemic plan.

**14. How ready are organizations, businesses, governments to implement?**

As a local government, we feel very ready to assist in implementing these actions. Some of the businesses in our town are very ready to implement while others are less so which means that requirements should be phased in.

**15. How should implementation be prioritized?**

Each of these policies is important and implementation of these key priorities should be coordinated and phased strategically, with a focus on creating benefits for small businesses and ensuring equitable service across all communities.

As a local government, provincial data standardization and sharing is particularly important to us. Ideally, waste audits would be partially funded by stewards. The province should coordinate waste audits to ensure coverage across the province and data needs to be made public and transparent.

**16. What are the benefits or limitations of expanded EPR options?**

Expanding EPR options offers several benefits and potential limitations. The primary advantage is the shift of costs back to producers, which can drive prevention and design changes. This approach creates synergies with existing programs and systems, potentially improving overall efficiency. By pairing with Recycle BC collection, it could allow small businesses to use residential systems where appropriate, and streamline transportation and processing, particularly benefiting smaller communities and First Nations.

While these benefits are significant, potential limitations could include initial implementation challenges and resistance from some producers.

**17. How ready are organizations, businesses, and governments to implement an expanded form of EPR?**

As a local government, we are ready to help implement an expanded form of EPR, as this would reduce many waste management challenges we face at the community level. To ensure successful implementation, a comprehensive and widespread education campaign is crucial. This campaign should focus on clearly communicating the roles and responsibilities of all stakeholders including businesses, institutions, local governments, and end-users. This education initiative would help create a smoother transition to the expanded EPR system by ensuring all parties understand their roles, responsibilities, and the benefits of the program. It would also help address potential resistance or confusion that might arise from changes to existing waste management practices.

**18. Are there sectors or materials that should be prioritized to be included or excluded?**

No sectors or materials should be excluded, however, a strategic approach to implementation can be beneficial. The focus could be on prioritizing sectors and materials that are easier to integrate into EPR systems initially. This approach allows for quicker implementation of the "low-hanging fruit" while providing time to develop solutions for more challenging areas.

Importantly, there needs to be a strong emphasis on supporting and incentivizing reusable packaging within EPR systems. The framework should be designed to ensure that reuse is not only accommodated but actively rewarded. This could involve offering incentives or reduced fees for producers who implement reusable packaging solutions. The system should avoid any unintended penalties for reuse, as this would contradict the fundamental goal of waste reduction.

**19. How should implementation of EPR actions be prioritized (e.g. by sector, by material, by geographic location)?**

Policy Option 1. Expansion of EPR to include packaging and paper products from more sources

Implementation of expanded Extended Producer Responsibility (EPR) should prioritize areas outside urban centers in Metro Vancouver, Capital Regional District, and Fraser Valley Regional District, focusing on rural areas with limited ICI recycling services. The program should be integrated with existing Recycle BC



systems for efficiency and cover all ICI packaging, including retailers, accommodations, food services, and offices.

Policy Option 2. EPR stewardship for a specific sector

The Clean Farms program should be regulated immediately. A separate framework should be developed for certain healthcare-specific and construction-specific packaging and products. Pallets should also be included in an EPR program.

Thank you for taking the time to consider our feedback.

Sincerely,

A handwritten signature in purple ink, appearing to read "Andrew Tucker".

Andrew Tucker  
Manager of Transportation and Waste Management

A handwritten signature in black ink, appearing to read "Lauren Harrison".

Lauren Harrison  
Zero Waste Coordinator



**Campbell River Whale Watching and Adventure Tours**

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Ministry of Environment and Climate Change Strategy  
Government of British Columbia  
Victoria, BC, Canada

Re: Feedback on Waste Reduction Policies for Non-Residential Sectors in British Columbia

Dear Ministry of Environment and Climate Change Strategy,

On behalf of Campbell River Whale Watching and Adventure Tours (CRWW), a proud member of the BC Green Business community, we appreciate the opportunity to contribute to the development of policies aimed at reducing waste, particularly in the non-residential sectors across British Columbia.

We commend the Government of BC for prioritizing the prevention and recycling of non-residential packaging waste. As an environmentally-conscious business, we are keen to share our insights and recommendations to support these efforts.

#### **Key Recommendations and Feedback:**

##### **1. Flexible Plastic Collection and Recycling:**

- While Campbell River Whale Watching has eliminated all single use plastic in our operations, we feel it is crucial to establish flexible plastic collection facilities that accept materials from commercial sources. Current facilities predominantly cater to residential waste and often cannot accommodate the volume generated by businesses.

##### **2. Affordable Collection Services:**

- Accessible and affordable collection services for both flexible plastics and organics are essential. CRWW uses compostable packaging for our homemade lunches, including food scraps. However, concerns remain regarding the capacity of local composting facilities to process food-soiled paper effectively.

##### **3. Blue Bin Recycling Services:**

- Ensuring reliable and affordable access to blue bin recycling services for businesses in all rural communities is critical. Improved infrastructure will facilitate responsible waste management practices and support environmental stewardship.

##### **4. Promotion of Sustainable Packaging:**

- CRWW supports funding for research and development in packaging innovation. We advocate for accessible and affordable food packaging options, including reusable and compostable fiber-based containers, to reduce our environmental footprint.



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**5. Circular Economy Initiatives:**

- Establishing a circular economy platform for material reuse and exchange would significantly contribute to reducing waste. Such initiatives should be supported by government funding to pilot and promote regional reuse programs effectively.

**6. Minimum Recycled Materials Content:**

- We encourage the implementation of a policy mandating a minimum recycled materials content in all paper and plastic products sold in BC. This measure will incentivize sustainable production practices and reduce dependency on virgin materials.

**Additional Recommendations:**

- **Accessible Signage Templates:** Providing businesses with accessible signage templates will facilitate education on proper waste diversion practices among staff and customers.
- **Textile Recycling Drop-off Facilities:** Establishing accessible textile recycling drop-off facilities will promote responsible disposal of textiles and reduce landfill waste.
- **Access to Clean Tap Water and Promotion of Reusable Water Bottles:** Encouraging businesses and consumers to switch from bottled water to clean, potable tap water, and promoting the use of reusable water bottles will significantly reduce plastic waste and promote sustainable water consumption practices.

**Conclusion:**

CRWW is committed to environmental stewardship and promoting sustainable tourism practices in Campbell River. We commend the Government of BC for prioritizing waste reduction policies and are eager to collaborate further to ensure these initiatives effectively support businesses in adopting sustainable practices.

Thank you for considering our feedback. We look forward to seeing meaningful progress towards a cleaner and more sustainable future for British Columbia.

Sincerely,

The team at Campbell River Whale Watching



July 23, 2024

CleanBC  
[circularcommunities@gov.bc.ca](mailto:circularcommunities@gov.bc.ca)

RE: Preventing Waste in British Columbia Non-Residential Packaging and Paper Products  
Discussion Paper - City of Kamloops Feedback

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### Discussion Questions

1. *Are there any desired outcomes missing from this list?*

A possible outcome that should be considered is efficiency. Where possible and where it makes sense to leverage existing infrastructure and systems within the residential sector so that efforts are not duplicated, or systems are not redundant (i.e., collection and or processing can be blended with residential system where it makes sense).

System needs to be user-friendly and not overly complicated.

2. *What outcomes are most relevant to your business, organization, or community?*

The prevention first approach is very desirable and it is important to see progress in prevention and circularity. Access is also very important as the system should equally work for big businesses in large urban centres, and for the small to medium sized enterprises in smaller and remote communities.

3. *How would you prioritize these outcomes?*

All of these outcomes are important, but prioritizing might look like: Prevention and circularity, followed by access, accountability and transparency, consistency and confidence, and then maximizing material recovery.

4. *Are there indicators or measures of success you would suggest are used to determine if an outcome is achieved or is achievable?*

The amount of packaging by type that is used (in the market) and how much is reused, recycled or disposed. Kg per (some sort of unit of measurement like \$ good sold) packaging generation. Percent of the weight of packaging relative to the product (with targets to drive packaging reduction).

Access measurements - % of businesses served by sector and by region.

Maximizing material recovery - % of material recovered is sent to end markets

5. *Should non-residential packaging targets be the same, or better than existing residential packaging targets? Why or why not?*

City of Kamloops staff believe it would be important to understand the baseline before making such a decision. Do we fully understand the scope of ICI packaging waste? What are the targets? Recovery rates? The system for tracking residential recovery rates is less than ideal using lagging data.

6. *What types of targets would be most useful? Reduction targets; reuse targets; recycling targets; diversion targets?*

City of Kamloops staff agree with the targets above; additionally, meaningful enforcement of targets is important.

7. *Should there be regional or business specific targets in addition to provincial targets? Why or why not?*

There should be sector specific targets as different industries deal with different types of packaging and systems. There should also be regional targets so that access is fair across the province.

8. *How can we measure success or progress against established targets?*

Consider looking at waste composition study data, perhaps establishing standard methodology for composition studies as it relates to the ICI sector. Industry funded. Phasing in different sectors as programs become established.

9. *What actions are best suited at the local, regional, or provincial level of government?*

It would be ideal to see all the actions managed at the provincial level. Limited resources at the local level to enforce bans. Although it is possible, it would be politically difficult to bring forward a landfill ban on ICI packaging without an established program.

Local and regional governments are more suited to supporting education and awareness of provincial actions.

10. *What factors should be taken into consideration if the Province enables or promotes local actions?*

There is a lack of resources and capacity to take on these actions at the local and regional level. Economies of scale can be achieved at the provincial level.

11. *What is already working to prevent packaging waste – for businesses, institutions, haulers, local governments?*

Unsure. There are some smaller businesses at the Farmer's Markets or Eco-Stores that are making efforts but nothing at scale.

12. *Are there other actions that should be considered? What are they?*

Ensure that there is adequate and long-term education and awareness on whatever program is established.

*13. What are the benefits or limitations of these waste prevention options?*

All of these waste prevention options have specific benefits and a combination of several (or all) of these options would make for an amazingly robust program.

*14. How ready are organizations, businesses, governments to implement?*

It is anticipated that there will be resistance from some businesses but generally, City of Kamloops staff are hearing from businesses and institutions that they want to participate in waste prevention and diversion programs.

*15. How should implementation be prioritized?*

There should be a phased approach and sector specific approaches. The priority should be sectors that are synonymous with the residential system so that these can be simply captured through those systems. Sectors that are large and represent “low hanging” opportunities should also be prioritized.

*16. What are the benefits or limitations of expanded EPR options?*

There are many benefits to an expanded EPR – shifting costs to the producers, building on efficiencies within the residential system, providing access to markets that might not otherwise be available. Many businesses in our community simply don't have access to recycling that is cost effective – they must pay a premium to participate and this requires dedication and willingness to pay higher disposal fees.

*17. How ready are organizations, businesses, and governments to implement an expanded form of EPR?*

For many in our area they are more than ready. Many businesses and institutions are very frustrated that the (recycling) services are either not available or very expensive.

*18. Are there sectors or materials that should be prioritized to be included or excluded?*

Some sectors would be more challenging (health care?), while others would be a seamless transition (schools, offices, residential-type premises, events, retail). Materials that are already covered under residential EPR should be prioritized.

*19. How should implementation of EPR actions be prioritized (e.g. by sector, by material, by geographic location)?*

By sector and material.

# Preventing Waste in British Columbia: Non-Residential Packaging & Paper Products Discussion Paper Questions

Thank you for the opportunity to provide feedback on this important waste reduction initiative that impacts all of British Columbia.

Please note that the comments being provided are those of RDKB staff as the timing has not allowed for the review or inclusion of our Board of Directors.

Should you require any clarification on the comments provided, please do not hesitate in reaching out.

Sincerely,  
Janine



**Janine Dougall** | General Manager of Environmental Services | She/Her  
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## General Comments:

Please make sure that the definition of Industrial, Commercial and Institutional (ICI) Waste includes those materials generated by recycling businesses and industries. For example, businesses or industries that have been established to manage/process existing EPR programs should be responsible for recycling the wastes generated by their operations (pallets, wrap, banding, etc.).

Wooden pallets/crates need to be included in the definition of Packaging and Paper Products. These materials also need to be considered as a source in the “Business to Consumer Packaging” category as for many products purchased by consumers, the packaging contains wood based materials.

## Questions and Responses:

1. Are there any desired outcomes missing from this list?
  - Yes, we need to emphasize reducing overall packaging use and minimizing material throughout. Additional outcomes should include achieving zero waste for packaging, holding producers

accountable, and ensuring services reach small communities without local subsidies. Effective policies should focus on reuse, reducing waste, and addressing hard-to-recycle materials.

- With an overall increase in the global population and the resulting increased consumption of materials, there is a need to emphasize reduced use of packaging overall.
- Rural communities need access and measures that drive collection/service in areas outside of cities. Service must be paid for by producers and not require subsidies from local governments.
- Producers need to be held even more accountable for what they create and sell and how their products are marketed and sold.
- Reuse and reusable packaging should be prioritized over disposable or even recyclable material.

2. What outcomes are most relevant to your business, organization, or community?

- All are relevant.

3. How would you prioritize these outcomes?

- We would prioritize in the order of 1,3,2,4,6 and 5 (1,3,4,2,6,5)

4. Are there indicators or measures of success you would suggest are used to determine if an outcome is achieved or is achievable?

- Success can be measured through data on total plastics used, percentage of materials reused or recycled, and effectiveness of EPR programs. Other indicators include per capita packaging use, reduction of virgin materials, and improved reporting on waste management and recycling processes.
- Access to diversion services is a key indicator of success or need for improvement.

5. Should non-residential packaging targets be the same, or better than existing residential packaging targets? Why or why not?

- Non-residential packaging targets should be stricter because the current residential targets are insufficient. Achieving higher targets for non-residential sectors will drive more significant reductions in packaging waste and encourage better waste management practices across all sectors.
- They should be better and higher based on much higher volumes of materials than residential in some cases.
- Targets should be clear, realistic and attainable
- Phased approach supporting continuous improvement but with significant penalties if targets not reached in the timelines committed to.

6. What types of targets would be most useful? Reduction targets; reuse targets; recycling targets; diversion targets?

- The most useful targets are for reduction, reuse, and recycling, along with comprehensive diversion goals. Focusing on reduction and reuse helps prevent waste. Recycling and diversion targets ensure effective waste management and resource recovery.
- There should also be local goals based on area to support circulation of food and products.

7. Should there be regional or business specific targets in addition to provincial targets? Why or why not?

- Yes, regional and business-specific targets are essential for equitable and effective waste management. These targets ensure that both urban and rural areas receive adequate services and drive action in all sectors to meet provincial goals.
  - There should be various targets by various sectors that produce different kinds of materials, as well as regional targets to ensure that BOTH urban AND rural areas get action and service.
  - Subsequent 'new targets' could be additions based on how these original specific targets have been met and achieved.
  - Targets should be set and measured on a Regional District basis however the targets should be consistent on a provincial level. I.e. Lower targets should not be acceptable in rural or hard to service areas.
8. How can we measure success or progress against established targets?
- Success can be measured through tracking waste diversion rates, the effectiveness of EPR programs, and reductions in packaging use. Monitoring EPR program performance, per capita disposal rates, and the achievement of recycling and reuse goals are key to assessing progress.
  - To effectively measure success or progress against established targets for waste management and sustainability, it is crucial to develop a comprehensive framework that includes data collection, analysis, reporting, and public transparency.
9. What actions are best suited at the local, regional, or provincial level of government?
- At the provincial level, enacting broad regulations, such as product bans and EPR requirements, is crucial. Locally, governments should support and monitor these regulations, ensuring that services are effectively carried out. Enforcement should be the responsibility of the province.
  - Local governments should be able to make their own bylaws regarding this without requiring each one to get provincial approval.
10. What factors should be taken into consideration if the Province enables or promotes local actions?
- The Province should define the scope for local actions, allowing all levels of local governments to adopt policies effectively. Coordination across regions and the establishment of a policy working group can help share best practices and address cross-boundary issues.
11. What is already working to prevent packaging waste – for businesses, institutions, haulers, local governments?
- Existing systems like EPR for residential packaging, product bans, and voluntary business actions have shown success. These measures reduce waste but expanding them and ensuring compliance are necessary for more significant impacts.
12. Are there other actions that should be considered? What are they?
- Consider expanding EPR to ICI sectors, mandating clear bags, and implementing a provincial disposal levy. Additional measures like supporting reusables and improving data collection will also drive progress towards waste reduction goals.
  - Provincial wide outreach, education and communications regarding waste with clear, concise, consistent messaging.

13. What are the benefits or limitations of these waste prevention options?
  - All options are beneficial as part of a comprehensive waste management strategy. A combination of EPR, product bans, and public education can drive systemic change, though each approach has limitations that need to be addressed through coordinated efforts.
14. How ready are organizations, businesses, governments to implement?
  - Readiness varies, with some organizations and governments prepared for EPR expansion while others need more support. A phased implementation approach and comprehensive education are essential for building readiness across all sectors.
15. How should implementation be prioritized?
  - Implementation should focus on large distributors and key sectors first to maximize impact. Ensuring that small businesses see the benefits of EPR and addressing the challenges of market value changes and enforcement are also crucial.
16. What are the benefits or limitations of expanded EPR options?
  - Expanded EPR can drive systemic changes by shifting costs to producers and encouraging better product design. However, it requires careful planning to avoid issues seen in past programs and to ensure fair practices, efficiency and equitable coverage across the entire province.
17. How ready are organizations, businesses, and governments to implement an expanded form of EPR?
  - While some entities are ready, many will require a strong educational push and support. A broad educational campaign and phased approach will help prepare all stakeholders for expanded EPR responsibilities.
18. Are there sectors or materials that should be prioritized to be included or excluded?
  - All sectors and materials should be included, with the hardest and most expensive materials targeted first. If you start with the easiest materials and set up your collection systems/infrastructure based on this, the system is designed to fail or take forever in getting the other more challenging ones set up. For example current diversion levels for residential PPP foam packaging, soft plastics etc. are low with one of the reasons being potentially because the system of collection has been set up to target the easiest and highest revenue generating materials.
19. How should implementation of EPR actions be prioritized (e.g. by sector, by material, by geographic location)?
  - Focus on rural and underserved areas first, then expand to all sectors and materials. Prioritizing areas with less existing infrastructure and ensuring comprehensive coverage will ensure that EPR actions are effective and equitable.
  - In more rural areas there are fewer waste haulers and in some cases no ICI recycling. Hauling and collection could be paired with residential for Recycle BC for much more efficient processing.
  - Health care is challenging but could potentially be its own division for certain products.

- Updating regulations and advocating for international agreements on plastics are also critical for long-term success. There should be a focus on shifting costs from local governments to producers, implementing comprehensive EPR, and supporting innovative waste reduction solutions.



## **Discussion Questions**

### **1) Are there any desired outcomes missing from the list?**

I believe the list is comprehensive relating to the products and services that are familiar to my business and related sector which is plastic reduction in the hospitality industry.

### **2) What outcomes are most relevant to your business, organization, or community?**

Most relevant desired outcomes for our business are;

- 1) Prevention-first approach
- 2) Consistency and confidence
- 3) Accountability and transparency

### **3) How would you prioritize these outcomes?**

- 1) Prevention-first approach
- 2) Consistency and confidence
- 3) Accountability and transparency
- 4) Economic benefits for a strong circular economy
- 5) Access
- 6) Maximize material recovery.

### **4) Are there indicators or measures of success you would suggest are used to determine if an outcome is achieved or achievable?**

Our business tracks the liters of products dispensed to our customers; these numbers are inserted into a calculation to determine the plastics saved through refilling. These metrics are shared with the customer. This collection of data could be used in several ways, one of which could be a small business rebate for plastics reduction, verified by third party reporting.

**5. Should non-residential packaging targets be the same, or better than existing residential packaging targets? Why or why not?**

Non-residential packaging targets should not be the same. The targets should be greater than residential packaging targets. The volume of products used in industrial and commercial packaging require greater attention. Small changes to the packaging type and possibly moving to reusable packaging will have dramatic affects on overall waste based on volume alone.

**6. What types of targets would be most useful? Reduction targets; reuse targets; recycling targets; diversion targets?**

I believe reduction targets and reuse targets would be most useful based on our experience.

**7. Should there be regional or business specific targets in addition to provincial targets? Why or why not?**

I believe there should be regional and business specific targets in addition to provincial targets. Promoting regional and business specific targets would elevate the conversation with businesses and would likely apply additional pressure to change from the current model. Many business owners refuse to change from the current model as it is easy and inexpensive and there is no incentive to change.

**8) How can we measure success or progress against established targets?**

This is a difficult question to answer, there could be a self reporting system for businesses annually where a percentage of submissions are audited. The data would be verified by a 3<sup>rd</sup> party company or with the supplier.

**9) What actions are best suited at the local, regional, or provincial level of government?**

Changes to the procurement process within government and local institutions could assist with change. The bidding process for contracts with government and local institutions could heavily weight the contract based on reducing or reuse plastic packaging. This would allow smaller companies to assist in the plastics reduction model with these organizations.

**10) What factors should be taken into consideration if the Province enables or promotes local actions?**

Factors that should be considered if the Province takes local action would be the availability of local resources, whether locations are rural and the nature of the products and packaging.

**11) What is already working to prevent packaging waste – for businesses, institutions, haulers, local governments?**

Our commercial refillery business is currently reducing and reusing plastic packaging in the hospitality industry, including restaurants, pub and breweries. This is for liquid dispensed products and cleaners. This model would be highly successful within government offices, schools and other institutions.

**12. Are there other actions that should be considered? What are they?**

I believe mandating specific types of plastic packaging for use, and plastic packaging should be available as a reusable item.

There are specific types of containers that are a major problem in the ICI industry. The use of a 5-gallon bucket that is pressed on and has no safe way to close for reuse is problematic. These containers cannot be used for any other purpose when emptied and cannot be refilled. A design improvement would allow the lid to be removable and the container to be resealable after its initial use.

**13. What are the benefits or limitations of these waste prevention programs?**

I believe the largest limitation to a waste prevention program is the high cost of entry into the market, the next limitation would include community awareness and acceptance of a new program.

The benefits of course include reducing plastic packaging and waste, creating a positive impact in a specific industry.

**14. How ready are organizations, businesses, governments to implement?**

I believe organizations and governments are ready. Most business owners we communicate with are very positive and optimistic about a waste prevention program, pricing is still the largest motivator with businesses if given the option to choose.

**15. How should implementation be prioritized?**

I think implementation would consider government first, then organizations and businesses.

**16. What are the benefits or limitations of expanded EPR options?**

I believe an expanded EPR option has several benefits, packaging design should improve for reuse options. End users of products will contemplate moving to suppliers who offer the best program under the EPR programs allowing small businesses suppliers to compete under the new rules. Expanding the program would allow reduce-reuse businesses to compete with large producers of products.

The limitation of this program will be the reporting mechanism used to accurately capture the EPR program.

**17. How ready are organizations, businesses, and governments to implement an expanded form of EPR?**

I believe the provincial government has done an excellent job in BC in promoting plastic reduction. Expanding the EPR program will be an adjustment, but not a surprise. I believe business and organizations have had several years to prepare and think about an expanded EPR program.

**18. Are there sectors or materials that should be prioritized to be included?**

We believe large contributors to single use plastic waste should be prioritized, this includes schools, restaurants, hotels, government facilities and transit providers. Industries where the cost of conversion is low and implementation is easy. In contrast, heavy industry would be more difficult to implement as the nature of products used are difficult for reuse and have more considerations when packaging.

**19. How should implementation of EPR actions be prioritized (e.g. by sector, by material, or geographic location)?**

I think they should be prioritized by material first, then by sector, then by geographic location.



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**Municipalities:**

McBride  
Mackenzie  
Prince George  
Valemount

**Electoral Areas:**

Chilako River-Nechako  
Crooked River-Parsnip  
Robson Valley-Canoe  
Salmon River-Lakes  
Tabor Lake-Stone Creek  
Willow River-Upper Fraser  
Woodpecker-Hixon

File No.: RECY 4.0

July 18, 2024

Ministry of Environment and Climate Change Strategy  
Non-Residential Packaging and Paper Products: Discussion Paper  
PO Box 9431 Stn Prov Govt  
Victoria, BC V8W 9M1

Dear Minister Heyman:

**Re: RDIFFG Response to the Ministry of Environment and Climate Change Strategy Non-Residential Packaging and Paper Products: Discussion Paper (April 23, 2024)**

Please accept the following as a formal response from the Regional District of Fraser-Fort George (RDIFFG) to provide feedback for the Ministry of Environment and Climate Change Strategy's Non-Residential Packaging and Paper Products: Discussion Paper.

In keeping with the submission guidelines, the RDIFFG has structured the response to provide feedback to the questions posed in each section of the Discussion Paper.

**The Proposed Desired Outcomes:**

The desired outcomes identified for improved management of non-residential packaging, including plastics and paper products are: prevention first approach, consistency and confidence, accountability and transparency, access, economic benefit for a strong circular economy and maximize material recovery.

Currently, there are no desired outcomes missing from the list. The most relevant outcomes for RDIFFG are prevention first approach, consistency and confidence and access.

The RDIFFG ranked the outcomes most relevant to the communities and businesses in our region as ones that enshrined equitable access for all participants in British Columbia, regardless of location or size of community.

The prevention-first outcome is critical to stop as many products as possible that must be recovered and recycled from being produced in the first place. Equally important is creating consistency in recycling and recovery programs so that no matter where someone is in the province, they understand how to recycle plastic and packaging waste.

The RDIFFG would prioritize the outcomes in the following manner:

- a. Prevention-first approach
- b. Consistency and confidence
- c. Access
- d. Accountability and transparency
- e. Maximize material recovery
- f. Economic benefits for a strong circular economy

It is critical when thinking about implementation that the onus of material recovery and creating a strong circular economy are not downloaded to small business and already overburdened institutions. Economies of scale for material recovery are only possible if the entire Province is working towards the same goal, without penalties or barriers for those in northern and rural communities. Consistency is imperative for buy in to the program and should mimic, where possible, the current residential packaging and printed paper recycling program as most British Columbians are familiar with this program either through curbside collection or depot service.

**Provincial Target Setting:**

Non-residential packaging targets should be as good, if not better than the current existing residential packaging targets, but there should also be a rural recovery rate that is upheld as separate from recovery rates in urban centers of over ten-thousand residents.

If a recovery rate is developed for rural versus urban areas, it could also be divided sector by sector, to identify which areas are complying and which sectors may struggle to adapt to a program. For example, if a school in a smaller, rural area were able to add PPP material to an already established recycling program, they may have very high diversion rates, versus a more industrial operation in the same location that may not have access to recycling markets or collection. Identifying sectors that may struggle to divert PPP would help both local and provincial governments know where policies may have to be altered to truly 'work.'

The MOECCS has mandated that local governments address their local waste diversion challenges and report on the solid waste disposal rate for their region each year. In more rural and northern areas, it is challenging to meet the provincial average for disposal rates due to lack of access to recycling markets, long distances to transport materials and economies of scale when it comes to diversion activities.

There should not be a one-size fits all approach to setting targets. In more rural locations, reuse and reduction targets might be more suitable, while in larger urban centers, areas with easier access to recycling markets, material recovery targets may work better.

**Supporting Regional Planning and Local Actions:**

Solid waste management planning, required by regional districts remains the best action at the local government level, but any actions and goals identified in these plans must be supported by stewardship programs that are accessible to all British Columbians. Banning material may not have the desired outcome in areas where residents have easy access to backroads for illegal dumping.

If requirements are set for source separating and material recovery at the Provincial level, it may incentivize regional districts to adopt policies in support of these requirements, but management of these materials must be supported by a stewardship agency.

There may also be creative solutions in remote and rural communities that should be considered and perhaps even exempted if they work 'better' for that community than a policy dictated province wide. Exceptions for areas that do not have easy access to large recycling markets is critical in cultivating the mandate of – not one size fits all.

**Exploring Provincial Policies:**

No one policy approach will encompass all ICI non-residential packaging in British Columbia and to attempt to create a single policy that holds a small local coffee shop to the same requirements as a large industrial operation will likely fail.

Instead, policies should be tailored to each section (and where applicable, each section should be sub-divided further). For example, when discussing institutions, they can be broken into different categories such as schools, post-secondary institutions and hospitals and care centers. Creating a policy for each sector of institutions, specified to that sector, would likely result in better buy-in, adoption of the program and increased material recovery.

Many businesses will only see this as a further barrier to their operations. Similarly, without full financial support to implement non-residential packaging and paper diversion, many local governments would not be able to implement such a change.

The non-residential sectors that most closely align with the current residential packaging and printed paper stewardship programs should be prioritized. Including small businesses into already



established programs, or creating a program that mimics the current Recycle BC one for small business and schools may be some early wins with regards to non-residential packaging and printed paper diversion.

A standardized method for how waste audits are conducted should be created and the data collected from these waste audits should be consolidated and available to everyone. If all waste audits were collecting the same data, regional trends could be identified and the effectiveness of current policy approaches could be determined. Standardized waste audits would also allow for easier comparison of targets between rural and remote communities and larger urban centers.

**Extended Producer Responsibility (EPR) Programs:**

The benefits of expanding EPR options is that people are already familiar with the programs, there are established guidelines and rules for participants and messaging and education would likely be able to utilize what already exists, simply expanding it to include sectors like small businesses and schools.

Many institutions and small businesses would be ready to participate in the diversion of non-residential packaging and paper waste if the program mimicked or was similar to the already existing residential PPP program.

Introducing an entirely new program with different collection options may delay the participation in such a program as well as create more confusion between what residents are already doing and familiar with, and what a non-residential program accepts.

In small and rural communities, allowing the small business and school sectors to return non-residential PPP to already established depots would likely increase participation in the program as well as lead to greater material recovery and early adopters of the program. Implementation of EPR should be prioritized according to sector, allowing those who most closely align with the already established program the chance to participate fully in PPP material recovery.

Large industrial operations should be encouraged to develop their own systems to manage, collect and recycle their PPP recyclables. Any approach to the inclusion of non-residential PPP into an EPR program must consider the vast differences when discussing the broad category of Industrial, Commercial and Institutional waste.

We hope these concerns are taken into consideration. We look forward to further engagement with the Ministry on this topic.

Sincerely,

Lara Beckett

Chairperson, Regional Board  
Chairperson, Environment and Parks Standing Committee

# Feedback From Regional District of Kitimat-Stikine

Provided by Kieran Griffith  
Zero waste Coordinator

1. Are there any desired outcomes missing from this list  
*Simplicity/Streamlined*
2. What outcomes are most relevant to your business, organization, or community?  
*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.*
3. How would you prioritize these outcomes
  - a. *Access*
  - b. *Consistency and confidence*
  - c. *Economic benefit*
  - d. *Accountability and transparency*
  - e. *Maximize material recovery*
  - f. *Prevention first*
4. Are there indicators or measures of success you would suggest are used to determine if an outcome is achieved or is achievable?  
*Success indicators could include: a registry of the number of businesses participating in the recycling program. Reductions in landfill waste volumes via composition or tonnage studies. Surveys indicating higher public awareness and satisfaction with recycling services.*
5. Should non-residential packaging targets be the same, or better than existing residential packaging targets? Why or why not?  
*The non-residential packaging targets should at the minimum be the same as the residential targets. The non-residential packaging market are expected to meet the same challenges and difficulties that the residential markets have experienced over the past decade.*
6. What types of targets would be most useful? Reduction targets; reuse targets; recycling targets; diversion targets?  
*From a local government perspective, diversion targets would be the most useful, as this provides a clear idea of the volume of material that is being actively diverted away from local landfills.*
7. Should there be regional or business specific targets in addition to provincial targets? Why or why not?  
*Yes, as a local government in northern BC the recycling and diversion resources available to both governments and to private businesses are limited in comparison to our counterparts in the lower*



*mainland. Having targets that align with the specific challenges faced by each geographic region seem appropriate.*

8. How can we measure success or progress against established targets?

*No Comments at this time.*

9. What actions are best suited at the local, regional, or provincial level of government?

*Local Level Actions:*

*Public Awareness and Education Campaigns:*

*Local governments are best positioned to engage directly with businesses to raise awareness about recycling programs and proper waste sorting practices. Initiatives could include community workshops, and/or informational brochures.*

*Enforcement of Local Bylaws:*

*Implement and enforce bylaws that mandate recycling for businesses and within the district. Ensure compliance through regular inspections and penalties for non-compliance.*

*Regional Level Actions:*

*Regional Coordination and Support*

*Facilitate collaboration among municipalities within the Regional District of Kitimat-Stikine to share resources and best practices.*

*Establish regional recycling facilities that can handle larger volumes of ICI materials, benefiting from economies of scale.*

*Data Collection and Analysis: Collect data on waste generation and diversion rates across the region to identify trends, challenges, and opportunities for improvement. Use data to inform policy decisions and track the progress of recycling initiatives.*

*Partnerships with Industry: Encourage businesses to participate in regional recycling efforts and support them with resources and guidance.*

*Provincial Level Actions:*

*Legislation and Regulation: Enact and enforce provincial regulations that ensures a consistent approach across all regions and provide clear guidelines and standards for businesses to follow.*

*Funding and Incentives: Offer financial incentives, grants, or subsidies to local governments and businesses to support the implementation of recycling infrastructure and programs. Establish a fund to help cover the costs of developing and maintaining recycling facilities where appropriate.*

*Province-wide Public Education Campaigns: Launch province-wide campaigns to promote recycling and waste reduction, reaching a broader audience.*

*Support pilot projects: Support innovative approaches to recycling and waste management that can be scaled up across the province.*

10. What factors should be taken into consideration if the Province enables or promotes local actions?

*Some factors that should be taken into consideration include:*

*Local Capacity and Resources: Assess the capacity of local governments and communities to implement and sustain recycling programs. This includes staffing, funding, and infrastructure availability.*

*Tailored Approaches: Recognize the unique characteristics and needs of different regions, including urban, rural, and remote areas. Customizing approaches to fit local contexts will enhance effectiveness and participation.*

11. What is already working to prevent packaging waste – for businesses, institutions, haulers, local governments?

*No comments on institutional recycling at this time.*

12. Are there other actions that should be considered? What are they?

*Product Design Regulations:*

*The RDKS believes that implementing regulations that require producers to design products with minimal packaging and use materials that are recyclable, or biodegradable would*

13. What are the benefits or limitations of these waste prevention options?

*Benefits:*

- 1) Shifts the financial and operational responsibility of waste management from municipalities to producers.*
- 2) Encourages producers to design more sustainable products.*
- 3) Can lead to more standardized and efficient recycling systems.*

*Limitations:*

- 1) Initial setup and compliance costs for businesses.*
- 2) Potential resistance from businesses unfamiliar with EPR frameworks.*
- 3) Need for robust regulatory oversight to ensure compliance.*

14. How ready are organizations, businesses, governments to implement?

*There is a moderate to high level of readiness among organizations and businesses in the Regional District of Kitimat-Stikine. Many are already familiar with Recycle BC's residential EPR programs and can adapt to similar frameworks for ICI materials.*

15. How should implementation be prioritized?

*For the RDKS, priority needs to be given to Industrial and commercial sectors, particularly large industry such as Liquid Natural Gas projects as well as large commercial sources such as grocery giants.*

16. What are the benefits or limitations of expanded EPR options?

*Benefits:*

*Enhanced Waste Reduction:*

*Shifts the responsibility of waste management from municipalities to producers, incentivizing them to design products with minimal packaging and more recyclable materials.*

*Leads to higher recycling rates and reduced environmental impact.*

*Cost Savings for Local Governments:*

*Reduces the financial burden on local governments for waste management, allowing resources to be reallocated to other essential services.*

*Innovation and Eco-Design:*

*Encourages producers to innovate and develop eco-friendly packaging and products, leading to advancements in sustainable design.*

*Consistency and Standardization:*

*Creates a uniform approach to packaging waste management across the province, ensuring consistency and compliance.*

*Limitations:*

*Implementation Challenges:*

*Requires significant changes in the regulatory framework and enforcement mechanisms, which can be complex and resource intensive.*

*Increased Costs for Producers:*

*Producers may face higher costs to comply with EPR regulations, which could be passed on to consumers through higher prices.*

*Resistance from Stakeholders:*

*Businesses and industries may resist changes due to perceived burdens and costs, necessitating effective stakeholder engagement and communication.*

*Infrastructure Requirements:*

*Expanded EPR options may require upgrades to existing recycling infrastructure and development of new facilities, requiring substantial investment.*

17. How ready are organizations, businesses, and governments to implement an expanded form of EPR?

*As a local government we are eager and ready for an expanded EPR program to be implemented.*

18. Are there sectors or materials that should be prioritized to be included or excluded?

*Sectors to Prioritize:*

*Retail and Consumer Goods:*

*High volumes of packaging waste make this sector a priority for EPR inclusion.*

*Food and Beverage Industry:*

*Significant use of single-use plastics and packaging materials necessitates focus on this sector.*

*Healthcare and Pharmaceuticals:*

*Ensuring safe disposal and recycling of packaging materials used in these sectors is critical.*

*Materials to Prioritize:*

*Composite and Multi-Material Packaging:*

*Difficult-to-recycle materials should be prioritized to improve recycling rates.*

*Hazardous Materials:*

*Packaging for hazardous materials requires careful management to prevent environmental contamination.*

19. How should implementation of EPR actions be prioritized (e.g. by sector, by material, by geographic location)?

**Implementation should be prioritized by sector, starting with those that have the highest waste generation and potential for significant diversion (e.g., retail and manufacturing).**

**Within sectors, prioritize materials that are easiest to recycle and have existing processing**

infrastructure. Geographic prioritization should ensure that both urban and rural areas have access to recycling services, with tailored approaches for remote locations.



July 23, 2024

Gwendolyn Lohbrunner  
Senior Director, Circular Communities  
Ministry of Environment and Climate Change Strategy  
PO Box 9341 Stn Prov Govt  
Victoria, BC  
V8W 9M1

Thank you for the opportunity to provide feedback on the *Preventing Waste in British Columbia: Non-Residential Packaging and Paper Products Discussion Paper*.

Recycle BC is a not-for-profit organization responsible for residential packaging and paper product (PPP) recycling throughout British Columbia, servicing over two million households or over 99% of BC through curbside, multi-family and/or depot services. As the producer responsibility organization (PRO) that operates the residential PPP system in BC on behalf of over 1,000 producer members, our primary concern is that the application of any policy tools to the non-residential PPP sector build on the success of the residential PPP system and do not undermine what Recycle BC, its members and its service partners have built over the last 10 years in the province.

Given our expertise in the application of extended producer responsibility (EPR) for PPP in BC, our comments focus on the policy option of expanding the province's EPR regulatory system to capture PPP from all or a portion of the non-residential or industrial, commercial and institutional (ICI) sector. As we do not believe it is our role to advocate for or against this policy option, as outlined below, our response is focused on potential impacts to the Recycle BC program and our guidance if the Ministry of Environment and Climate Change Strategy ("the Ministry") moves forward in exploring this policy further.

**Non-Residential PPP Sector Context:**

The non-residential sector is extremely diverse and encompasses sources such as office buildings, schools, hospitals, hotels, entertainment venues, retail stores, restaurants, warehouses, construction sites, manufacturing centers, farms, horticultural greenhouses, logging camps, fishing camps and mines. Disposal and recycling management systems and options vary significantly based on sector, size and geography. The type, size, material mix and quantity per generator of PPP from the non-residential sector can also be different from the residential sector. As such, the requirements for collecting and processing non-residential PPP will be broad and varied and not always in alignment with what has been built and managed for residential PPP. The recycling needs of the many generators of non-residential PPP will vary significantly from each other, even within similar sectors (based for example on size and location), and from residents.

The potential size and scope of a system to manage non-residential PPP cannot be understated. According to the *British Columbia Industrial, Commercial and Institutional Packaging and Paper Products Baseline Report: Waste Flows Study*, the ICI sector disposes between 225,000-326,000 tonnes of PPP per year and collects for recycling between 200,000-300,000 tonnes of PPP per year for an estimated supply of up to 626,000 tonnes. As a point of comparison, in 2023 Recycle BC producer members reported a total supply

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of 250,000 tonnes of residential PPP. While the ultimate size of an EPR system to manage non-residential PPP would reflect the size of the portion of the non-residential sector targeted by this policy option, such a system has the potential to be roughly double the size of the residential system.

While many producers of non-residential PPP also supply PPP to the residential sector, there are many producers of non-residential PPP that are not members of Recycle BC and that do not supply residential PPP to BC. The application of EPR to non-residential PPP would have significant operational and financial impact on an extensive number of additional organizations and businesses with little to no experience with EPR. Recycle BC does not have a mandate from its members in respect of non-residential PPP or from the extensive number of additional organizations and businesses that could be impacted. As such this submission should not be interpreted as advocating for or against EPR as a policy option for this material.

### **Impacts to the Residential System:**

An expansion of BC's EPR regulatory framework to capture all or a portion of the PPP from the non-residential sector could have several impacts on the residential PPP system managed by Recycle BC. As there are still significant data gaps on the management of PPP in the non-residential sector, the exact nature of these impacts is unknown and can only be described at a high level.

To reduce cost, build operational efficiencies and ensure economies of scale, the application of EPR to the non-residential sector would necessitate some level of blending of the residential and non-residential sectors from an operational perspective. As some sources of non-residential PPP are likely to have high levels of contamination and low-quality material at end-of-life, this will change the mix of PPP and could jeopardize Recycle BC's continued ability to access markets and hinder Recycle BC's positive trend of increasing sales to domestic markets (which demand high quality materials). Also, as the recovery rate performance of the non-residential sector is expected to be significantly different than the residential sector after 10 years of residential program operation, a blending of these two sectors could lead to the perception of a major decline in total system performance. Performance metrics of the residential PPP program will be impacted and line of sight to the performance of each sector could be lost. This will make comparisons across provinces and programs difficult. This is likely to be most acute with certain types of plastics, where the plastic recovery rate in the non-residential sector may significantly lag the residential sector.

The variability of PPP composition, quantities and management in the non-residential sector would add significant complexity to the program. This is particularly the case where non-residential sources of PPP have already developed successful systems to manage their waste appropriately. Ensuring chain of custody of material that has established markets and that provides revenue to the generator of that PPP is likely to be difficult and cause market disruption, without a corresponding improvement in environmental performance.

In the interest of balance, it should be noted that there could also be benefits to the residential system by incorporating a portion of the non-residential sector into the same regulatory framework. These could include increased economies of scale for market pricing, improved collection route efficiencies, a simplification of some depot operations and harmonization of recycling habits across public and private spaces.



### **Policy Considerations Moving Forward:**

The following section outlines several considerations if the Ministry is to move forward in the study of EPR as a policy tool for the non-residential PPP sector. Recycle BC's aim is to minimize or eliminate disruptions to the success of the residential system and to ensure a fair, feasible and cost-effective approach to the application of EPR, if the Ministry proceeds with this policy approach. As noted above, our observations should not be interpreted as advocacy for or against EPR as a policy option for non-residential PPP.

As the discussion paper does not provide sufficient details on how an EPR framework could be applied to non-residential PPP, there are significant policy gaps that would need to be filled if the Ministry moves forward with this approach. Given Recycle BC's expertise in managing the residential PPP system in BC for over 10 years and the success of our program, we encourage the Ministry to engage directly with us as much as possible during this process, when applicable. While the decision on how to move forward following any regulatory changes would be made by obligated producers, Recycle BC believes it is in the best position to guide a solution to a regulatory approach that captures non-residential PPP in an EPR framework. As it stands, our experience should be called upon to ensure the impact of policy options being considered are fully understood, particularly as to potential implications to the continued success of the residential system.

An EPR approach could have significant financial and operational consequences to the organizations and businesses targeted. It is expected there are many groups of producers of PPP in the non-residential sector that have not been engaged as part of the feedback process to this discussion paper, particularly those not currently captured by the residential program. Targeted consultations with any non-residential sectors being further considered for an EPR approach are strongly advised moving forward.

Understanding the implications of the application of EPR in the non-residential PPP sector is difficult in the absence of detailed scope and definitions to clearly define the materials, sectors, organizations, and businesses targeted. For example, the discussion paper outlines "small businesses" and "industry" as two possible sources of non-residential PPP that could be targeted by an EPR approach, both categories of which could be defined and interpreted broadly or very narrowly across many economic sectors. The types of PPP used in the non-residential sector can differ significantly from those used by residents, often with additional complexity of reuse applications. The exact types of PPP targeted will have a major bearing on system design and implementation. Clear definitions of targeted PPP, producers and industry sectors will be critical to understand obligations, aid feedback, inform regulatory language, and enable program design.

Given significant variability in the non-residential sector, obligated producers should be allowed maximum flexibility in program design to meet the obligations of an EPR approach. BC has had great success in applying a results-based, performance-driven regulatory framework to EPR in general, and this strategy will be critical in the non-residential PPP sector. The end-of-life needs of different generators of non-residential PPP will differ significantly even within the same economic sectors, which may require a variety of financial, operational and data validation considerations to ensure feasibility, efficiency and the equitable allocation of cost.



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A fair application of the obligations of EPR in the non-residential PPP sector is also critical if the Ministry moves forward with this policy change. In particular, the application of an EPR framework needs to ensure that any sectors targeted for the collection of their PPP are matched with all associated obligations, including paying and reporting into any collective scheme that they are expected to use at end-of-life (unless they are managing an independent program). As a basic principle of fairness, any non-residential organization or business that takes advantage of a collective system for the collection and recycling of their PPP would be required to directly pay into that system unless the obligation falls to another party higher in their supply chain. Whether these financial and administrative obligations fall directly on the businesses or organizations that generate the PPP at end-of-life or on someone else in their supply chain, the potential financial and administrative implications should not be underestimated. The costs to collect and transport many types and sources of non-residential PPP are expected to be high, particularly in rural and remote areas. In some cases, these stakeholders may consider the cost and complications associated with paying and reporting into a system to significantly outweigh the advantages of any new end-of-life outcomes. Without a fair application of all associated obligations, an EPR approach risks one group of organizations or businesses subsidizing the waste generated by others, which raises competitive, economic and environmental concerns that would threaten the fairness and validity of the EPR system as a whole.

This important principle is complicated by the fact that many small businesses are currently exempt from the obligations associated with residential PPP under the current Recycling Regulation. Any extension of an EPR approach to capture small businesses in the non-residential sector without consideration for equality across the full system would be problematic. However, doing so could add cost and administrative complexity into a sector sensitive to these drivers. Likewise, a fair and reasonable approach to the application of EPR to PPP generated in schools would necessitate additional producers or even organizations like school boards to report and pay. These are two examples of many sectors that may face unwelcome costs and disruption unless a thorough consultation is undertaken across all defined sources and types of ICI.

Thank you again for the opportunity to provide comments on the *Preventing Waste in British Columbia: Non-Residential Packaging and Paper Products Discussion Paper*. We look forward to engaging further with you on these topics.

Sincerely,

Jordan Best  
Senior Director, Program Development Western Canada, Recycle BC

Cc. Robyn Collver, Chair, Recycle BC  
Tamara Burns, Executive Director, Recycle BC





**RE: Clean BC’s Preventing Waste in BC – Non-residential PPP Discussion Paper**

Thank you for the opportunity to provide feedback. We are grateful for the work done to advance waste reduction in the Industrial Commercial Institutional sector.

For the Recycling Council of BC, the overarching outcome we hope to achieve through the expansion of regulations to address non-residential packaging and paper products is a consistent system that improves upon the residential system and that is clear to the public. It will do this because it demonstrates transparency, accountability and ambition in order to counter the negative social cues that have been associated with waste diversion and the ICI sector, and that have created a knock on effect to the larger system.

The outcomes of this regulatory shift should complement the Ministry of Environment and Climate Change’s provincial Circular Economy approach. This means having goals and targets that address waste upstream before it is created. Prevention, reduction and reuse should be prioritized. If an EPR approach is used, it needs to have explicit mechanisms to drive redesign up the chain.

<p>1. Are there any desired outcomes missing from this list?</p>	<ul style="list-style-type: none"> <li>- The accountability and transparency piece needs to make clear who is responsible for funding management of ICI materials.</li> <li>- It should be a desired outcome that the system that is put in place is efficient. It could be inefficient to have two parallel systems - residential and ICI - especially in smaller communities and with SME’s.</li> </ul>
<p>2. What outcomes are most relevant to your business, organization, or community?</p>	<p>From RCBC’s perspective, it is most important that we achieve an overall reduction of waste generated. Through upstream solutions we should design waste out of the system to prevent waste at the source.</p>
<p>3. How would you prioritize these outcomes?</p>	<p>Overall reduction in waste and waste prevention are priorities, and restrictions on what can be brought into the province can aid in this. Prioritizing efficiency in the system and ensuring that these goals can be met by SME’s without creating unnecessary burden.</p>

<p>4. Are there indicators or measures of success you would suggest are used to determine if an outcome is achieved or is achievable?</p>	<p>There are a number of indicators that could help in measuring success. All require detailed data collection from businesses and producers as well as municipal waste streams:</p> <ul style="list-style-type: none"> <li>- Total reduction of waste in the landfill</li> <li>- Increase in reuse or refill for packaging categories</li> <li>- Overall reductions in use of virgin packaging</li> <li>- Disposal of packaging (total and per capita)</li> <li>- Total disposal of all waste per capita (with a series of decreasing targets)</li> <li>- Reporting (verified by third party if possible) about where materials go (similar to existing EPR program requirements but more stringent)</li> </ul>
<p>5. Should non-residential packaging targets be the same, or better than existing residential packaging targets? Why or why not?</p>	<p>It's important that non-residential packaging targets be better than residential targets. The residential system has struggled with overall reduction and prevention and there are many lessons to be learned there, and that can inform targets for ICI material. There is also the infrastructure of the residential system that can support the ICI work, especially for SME's in rural and remote communities. We are not starting from ground zero and the ambition of these targets should take that into account.</p>
<p>6. What types of targets would be most useful? Reduction targets; reuse targets; recycling targets; diversion targets?</p>	<p>The targets that are the most useful should track back to the overarching goals and desired outcomes and prioritize reduction, reuse and then recycling. Diversion is less important in measuring the success of the outcomes of this legislation.</p>
<p>7. Should there be regional or business specific targets in addition to provincial targets? Why or why not?</p>	<p>As stated upfront, we do not support a blanket approach to this issue.</p> <ul style="list-style-type: none"> <li>- There are differences in the capacity of large businesses vs. SME's. Business targets may be useful and necessary for the strategy to work, and targets for specific sectors within business (i.e. retail, restaurant, C&amp;D) may be useful.</li> </ul>

	<ul style="list-style-type: none"> <li>- Addressing areas where the greatest amount of waste is being generated, and cascading or phasing from there, may be a beneficial strategy.</li> <li>- Different regions of the province experience different opportunities and challenges such as in rural communities where there can be limited options for SME's to manage material.</li> </ul>
8. How can we measure success or progress against established targets?	Being able to demonstrate progress requires the collection of more and better data. This data collection and reporting should be mandatory throughout the ICI sector, and include haulers.
9. What actions are best suited at the local, regional, or provincial level of government?	In order to determine what actions are suited to which level of government it's necessary to see the final legislative approach. Without thoughtful research and design there is a risk that responsibility will be downloaded to local and regional governments. This is a serious concern when the cost of recycling is greater than landfill disposal.
10. What factors should be taken into consideration if the Province enables or promotes local actions?	There is a need to consider different approaches for different levels of government and types of communities (rural, urban). For example, in rural and remote communities where there may be few or no local service providers for ICI materials.
11. What is already working to prevent packaging waste – for businesses, institutions, haulers, local governments?	Very little is currently working to prevent packaging waste. The system is collecting material at the end of the pipeline after it has already been created. Currently, we are nowhere near waste prevention.
12. Are there other actions that should be considered? What are they?	Support around solo EPR solutions. EPR on its own was never intended to be a stand alone solution. It will require support actions and investments if an EPR approach is chosen.
14. How ready are organizations, businesses, governments to implement?	Some organizations, businesses, and local governments are more prepared than others, which is why we support the ministry in not moving forward with a blanket approach to implementation.

15. How should implementation be prioritized?	A phased approach (with large businesses and producers first) can demonstrate to small businesses that the process works, creates a benefit, and is not a burden on their operations.
16. What are the benefits or limitations of expanded EPR options?	<ul style="list-style-type: none"> <li>- Transparency and accountability are crucial.</li> <li>- EPR currently is not addressing production of waste and waste generation. The discussion paper references the waste reduction hierarchy, but the language comes across as directed to residents - the onus for waste prevention cannot be put on consumers.</li> </ul>
17. How ready are organizations, businesses, and governments to implement an expanded form of EPR?	Businesses and organizations will respond to legislation. The key is to ensure that special consideration is given to small businesses and smaller governments that may have less capacity to implement changes and more limited resources.
19. How should implementation of EPR actions be prioritized (e.g. by sector, by material, by geographic location)?	It's important to prove this can work at the large scale and produce results. A phased approach (with large businesses and producers first) can demonstrate to small businesses that the process works, creates a benefit, and is not a burden on their operations.

We appreciate the opportunity to provide feedback and we are happy to discuss these comments.

Sincerely,

Lyndsay Poaps  
Executive Director - RCBC

The proposed policy approaches in British Columbia to address non-residential packaging and paper product waste are commendable. Drawing from successful global initiatives and traditional ecological knowledge, this response aims to provide comprehensive feedback on the proposed outcomes and policies.

## **Feedback on Proposed Outcomes**

### **1. Prevention-First Approach**

Globally, countries like Germany and Japan have successfully implemented prevention-first approaches that align with Indigenous teachings of stewardship and minimizing waste. For example, Germany's Packaging Act encourages minimal, recyclable, and reusable packaging. British Columbia should adopt stringent regulations to reduce waste at the source, reflecting both global best practices and Indigenous values.

### **2. Consistency and Confidence**

Consistency in waste management programs is essential for building trust and participation. Sweden's unified national recycling system ensures uniformity across municipalities, achieving high recycling rates. British Columbia should ensure consistent recycling options across all sectors, including remote and rural Indigenous communities, to foster confidence in waste management systems.

### **3. Accountability and Transparency**

Transparency and accountability are crucial for effective waste management. South Korea's EPR schemes require detailed reporting from producers. British Columbia should implement rigorous reporting requirements, making data publicly available to ensure accountability and track progress toward waste reduction goals, resonating with both environmentalist principles and the Indigenous value of transparency.

### **4. Access**

Equitable access to waste management services is a fundamental right. In Denmark, comprehensive recycling services are available to all, including remote areas. British Columbia should prioritize providing these services to all communities, particularly Indigenous and remote areas, ensuring everyone can participate in waste reduction efforts.

### **5. Economic Benefits for a Strong Circular Economy**

The Netherlands has integrated circular economy principles into its national policies, promoting innovation and green jobs. British Columbia can leverage traditional Indigenous knowledge and contemporary practices to foster sustainable business practices, create green jobs, and support local economies, aligning with a circular economy model.

### **6. Maximize Material Recovery**

Effective material recovery systems, such as Norway's advanced sorting and recycling infrastructure, are essential for reducing landfill waste. British Columbia should invest in similar infrastructure to enhance

the quality of recycled materials and support new product creation from recovered materials. Indigenous communities can play a vital role in these efforts, contributing to and benefiting from sustainable practices.

## **Feedback on Provincial Target Setting**

### **1. Target Alignment**

Non-residential packaging targets should be ambitious and align with residential targets. The European Union's Circular Economy Action Plan sets clear, ambitious goals for packaging waste reduction and recycling. British Columbia should set equally ambitious provincial targets to drive continuous improvement and align with global standards.

### **2. Types of Targets**

Reduction, reuse, and recycling targets should all be included. France's anti-waste law sets targets for reducing single-use plastics and increasing recycled material use. British Columbia should establish comprehensive targets for waste management to drive holistic improvements.

### **3. Regional and Business-Specific Targets**

Regional and business-specific targets address local needs and challenges. The United Kingdom's varied regional waste management targets allow tailored approaches. British Columbia should consider these specific needs when setting targets to ensure all communities, including Indigenous ones, can effectively manage waste.

### **4. Measuring Success**

Success should be measured through robust data collection and transparent reporting. Metrics should include the volume of waste diverted from landfills, reduction in single-use packaging, and increased recycled content. Regular audits and public reporting will ensure accountability and allow for adjustments to meet targets.

## **Feedback on Supporting Regional Planning and Local Actions**

Local actions are crucial for addressing unique waste management challenges. Italy's regional waste management plans, tailored to local conditions, have proven effective. British Columbia should empower local governments and Indigenous communities to develop and implement waste management plans reflecting their specific needs and values, supported by provincial guidance and resources.

## **Feedback on Exploring Provincial Policies**

### **1. Disposal Bans**

Implementing disposal bans on certain materials, as seen in Metro Vancouver and several U.S. states, can significantly reduce landfill waste. British Columbia should expand these bans to cover more types of packaging materials, supported by effective enforcement and compliance mechanisms.

## **2. Standardized Waste Prevention and Management Actions**

Mandating waste audits and reduction plans, similar to Ontario's regulations, can help businesses identify and implement waste reduction strategies. Clear guidelines and support from the province can help businesses and institutions develop effective waste management plans.

## **3. Data Standardization and Sharing**

Standardized data collection and sharing, as practiced in California, can enhance coordination and effectiveness in waste management. British Columbia should adopt standardized waste categorization and reporting systems to facilitate better data sharing and informed decision-making.

## **Feedback on Extended Producer Responsibility Programs**

### **1. Expanded EPR Options**

Expanding EPR programs to include more non-residential packaging, as seen in Quebec and Oregon, can shift the responsibility to producers and improve recycling rates. British Columbia should broaden the scope of EPR to cover a wider range of packaging materials and sources, ensuring comprehensive waste management.

### **2. Sector-Specific Stewardship**

Sector-specific EPR programs, like the agricultural packaging programs in Manitoba and Saskatchewan, address unique waste streams effectively. British Columbia should develop tailored EPR programs for sectors with distinct packaging needs, ensuring comprehensive waste management.

## **Conclusion**

British Columbia's initiative to address non-residential packaging waste is commendable. By learning from traditional Indigenous knowledge and contemporary global best practices, the province can lead in sustainable waste management. I encourage the adoption of stringent, consistent, and transparent policies that prioritize waste prevention, enhance recycling infrastructure, and support a circular economy. This holistic approach will protect our environment, support economic growth, and uphold the values of both Indigenous and environmentalist communities. Thank you for the opportunity to provide feedback on this critical issue.

Submitted via email: [Circularcommunities@gov.bc.ca](mailto:Circularcommunities@gov.bc.ca)

July 23, 2024

**Re: Preventing IC&I paper and packaging waste in the IC&I sector in British Columbia**

To: British Columbia Ministry of Environment and Climate Change Strategy

On behalf of our members, Restaurants Canada appreciates the opportunity to respond to the British Columbia Ministry of Environment and Climate Change Strategy's discussion paper *Preventing Waste in British Columbia: Non-residential Packaging & Paper Products*.

Restaurants Canada is a growing community of more than 30,000 foodservice businesses, including restaurants, bars, caterers, institutions and suppliers. We connect our members from coast to coast, through services, research and advocacy for a strong and vibrant restaurant industry. Through this submission, we aim to highlight the impact of our industry on BC's economy, our progress toward more sustainable outcomes, suggested principles for designing effective IC&I waste prevention policies, and potential policy options that could be feasible for the foodservice industry.

**1. The impact of the foodservice industry in British Columbia**

British Columbia's foodservice sector includes 15,315 small businesses and generates \$20 billion in annual sales. With roughly 197,000 foodservice workers, our sector is the province's third-largest private sector employer (see Image 1). Foodservice operators are proud members of their communities — their businesses serve as social clubs for seniors, sponsors for local hockey teams, boardrooms for small businesses, and meeting places for community groups.

While restaurants play an important role in BC's economy, it is important to understand how the industry is operating in this economic climate while also participating in the transition to a low-carbon, minimal waste economy. From a sales and profitability perspective, BC's foodservice industry is struggling. While all segments of the foodservice industry are reporting lower per capita sales, drinking establishments and full-service restaurants are experiencing the largest declines, down 9% and 4% respectively in 2024 from 2023. Currently, profitability is stalled by the combined headwinds of high operating costs and waning consumer demand due to the economic slowdown and high inflation. Overall, nearly half (47%), of restaurant companies were operating at a loss or just breaking even in April 2024. Meanwhile, just 9% are earning a profit of 10% or more. This is a mirror version of pre-pandemic profitability. At that time, just 12% were operating at a loss or breaking even, and 36% had a profit of 10% or more.



Amidst this challenging economic climate, the foodservice industry is maintaining waste prevention as a priority. Some of Canada's largest restaurant chains have taken strides to introduce reuse programs in their restaurants, while others are innovating packaging from renewable, recycled, or certified sources and diverting waste from landfills. As our members' efforts to prevent and reduce waste continue to progress, they remain unified in wanting to work with governments to overcome the barriers to achieving full circularity in British Columbia and more broadly across Canada.

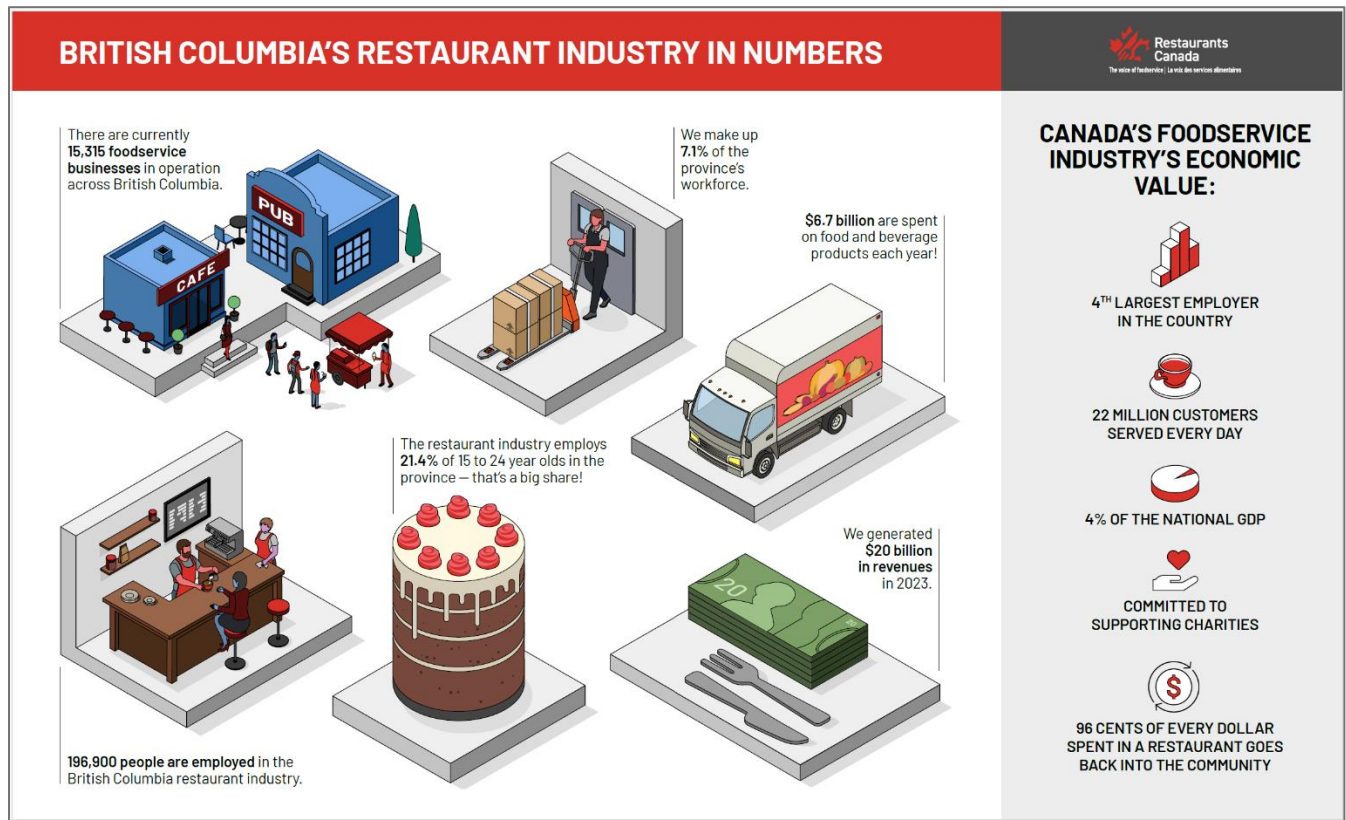


Image 1: The restaurant industry's economic contribution in British Columbia.

## 2. ICI waste management and the restaurant sector today

Restaurants Canada and our members support efforts to increase recycling and diversion in BC. As part of this, we understand the foodservice industry is a critical player in this system, and has an important role to play in helping to prevent IC&I paper and packaging waste from ending up in landfills. Therefore, our members are eager to make an impact in the areas of this system where they have operational control and influence.

Today, many restaurants are managing their IC&I waste through contracts with waste haulers, and as a result, are already paying to divert paper and packaging waste from landfills while

investing in source separation and customer/staff education. In comparison, some restaurants lease their spaces and are reliant on building owners and/or management for waste and recycling. Therefore, there are different challenges and considerations when identifying solutions for the foodservice sector.

Beyond these diverse considerations, some of the national restaurant chains across Canada are currently working to improve circularity upstream in their supply chains. They are innovating to reduce the amount of packaging used and improve recyclability, while exploring opportunities to introduce reusable alternatives in some locations across Canada.

In developing policies to prevent paper and packaging waste in the IC&I sectors, it is important for the BC government to consider the complexity of the recycling value chain, all of whom contribute to the challenges surfaced in the discussion paper released in April 2024. This includes the manufacturers and suppliers of paper and packaging, restaurants and other foodservice outlets, consumers, waste haulers, material recovery facilities (MRFs), and end-markets for recycled materials. It is critical that any future policy recognizes the complexity and points of responsibility across the value chain, and fairly holds each player accountable to their role in ensuring proper diversion.

### **3. Guiding principles for developing effective prevention of paper and packaging waste in the IC&I sector in the foodservice industry**

Foodservice operators have a long history of managing their front- and back-of-house waste, and have deep experience managing the full systems of players that operate across the recycling value chain. As the government moves forward with this policy process, Restaurants Canada proposes the following guiding principles, developed based on the experiences of our members, as important considerations for the foodservice sector. These principles aim to increase the efficacy of IC&I paper and packaging waste prevention in the province.

Across each of these principles, and as outlined in section 1 of this submission, Restaurants Canada asks the government to be mindful of the financial challenges faced by the foodservice industry today. This includes considerations that ensure regulatory alignment in areas such as food safety and recycled materials. It is critical that government works together with the foodservice industry to ensure policies support, rather than add further financial constraint, on our members.

- a) **Data informed policy making:** Foremost, it is critical the government makes evidence-based decisions based on the most up to date data. Further, this data must take into account the differences between sectors, material types and sources. Any policy that is developed, including target setting, must be grounded in accurate and comprehensive data to ensure effectiveness and relevance across sectors and different geographic considerations (i.e., rural vs. urban). Data on existing infrastructure, technology and end

markets is also crucial to set an accurate baseline and inform future investments and upgrades.

**b) Standardization:**

- **Data** – The foodservice industry understands and supports the need to collect data to assess baselines, set achievable targets, and measure progress toward circularity. Many foodservice operators are already collecting waste-related data for their own waste target tracking, meeting municipal requirements, and preparing to adhere to the forthcoming federal plastics registry. As the government develops requirements for both the collection and types of data for reporting, Restaurants Canada encourages the province to harmonize these requirements with existing reporting obligations and EPR programs, and to consult with the industry to minimize further administrative burden. Additionally, all reported data must be kept confidential, anonymized, and aggregated due to competition and privacy concerns
- **Infrastructure** – Standardizing the types of materials that can be collected and effectively recycled, including the levels of accepted contamination at recycling facilities, will be critical for the foodservice industry to ensure the right processes are in place to source packaging, train staff, educate guests and implement sorting procedures that support improved diversion rates. Time and investment will also be needed to upgrade and scale infrastructure to accommodate increased volumes and types of materials. As part of this, the onus should not only be on producers but other important players in the system, such as waste haulers, to ensure material recyclability is aligned with infrastructure capabilities. The government can play an important role in this by clearly defining “recyclable material” so there is a consistent understanding among stakeholders. In addition, the government can help build capacity by providing financial incentives, particularly in remote/isolated areas where there have been limited recycling options to-date.

- c) Phased approach:** Given the diverse nature of IC&I institutions, some are more amenable to the policy alternatives outlined in the discussion paper relative to others. For example, schools and hospitals are more “closed loop” types of facilities, making the implementation and management of waste in these institutions a more natural place to begin the implementation of IC&I paper and packaging waste policies. Using a phased approach to implement these policies will encourage early learnings and the opportunity to introduce improvements to the policy before they are scaled to help reduce cost and complexity.

Similarly, as the government considers available policy instruments, it is important to recognize that the diverse geography across the province will necessitate different

solutions for different areas, each with varying levels of complexity. It will be crucial to focus actions on the greatest gap areas while building on existing solutions.

- d) **Regulatory alignment:** As the government develops IC&I paper and packaging waste policies, the foodservice industry requests they do so in conjunction with food safety regulators in British Columbia and federally. Ensuring waste prevention policies are aligned with food safety and recycled content regulations throughout the development process will help avoid implementation challenges, confusion for foodservice operators, and potentially harmful safety incidents for consumers.
- e) **Timeline considerations:** Restaurants Canada encourages the government to collaborate with stakeholders to develop a timeline for policy development and implementation that is realistic for both businesses and consumers. Foodservice operators often plan their product sourcing and supply chain strategies a year in advance, in addition to the time needed to develop training and operational procedures. The successful adoption of new IC&I policy also depends on consumer behavior changes, which will take time to achieve for effective front-of-house sorting of paper and packaging waste.

We understand that the government has committed to announcing a policy approach in 2025. However, given the cost and intensity of efforts required by businesses to prepare for new requirements, Restaurants Canada urges the government to adopt a realistic timeline. Additionally, it is critical that the government has accurate baseline data to make evidence-based policies. This approach should also allow time to integrate learnings from Quebec's transition to EPR for IC&I, which is still in its infancy, into BC's framework.

- f) **Consumer education:** As described above, consumer education will be an important part of adopting a new IC&I policy for waste created in restaurants' front-of-house, particularly when it comes to source separation. The government should consider including a consumer education strategy as part of any new policies created. Restaurants Canada would be happy to work with government on the development and execution of this campaign to ensure success.

#### 4. Exploring policy options

While the discussion paper includes many policy alternatives, this submission focuses on policies that are viable options for the foodservice industry, and highlights challenges and considerations for other policies put forward.

- a) **Designated materials:** The foodservice industry supports the development of a designated list of packaging materials and types of products that are readily recyclable.

If the BC government moves forward with this approach, Restaurants Canada asks that the list is developed in consultation with the industry and its packaging suppliers, and aligns with existing EPR programs. This process should coincide with a plan for infrastructure adaptation and development that aligns with the materials list and the on-the-ground realities of a restaurant's operations. There should also be an ongoing process for engagement to ensure the list of designated materials is updated overtime and reflects market and infrastructure realities. Where possible, harmonization with other provinces and territories should also be prioritized to support longer term standardization across Canada.

- b) Disposal bans for packaging materials:** The foodservice industry supports the prohibition of designated materials from landfill disposal across BC. To reduce confusion and improve environmental outcomes, the list should be consistent across the province, rather than having a fragmented municipal approach. Similar to the list of designated materials policy option above, Restaurants Canada asks that the list of materials for the ban is developed in consultation with the industry and their suppliers to ensure the implementation is feasible for restaurants including a clear understanding of who is responsible for compliance as well as the process(es) for monitoring/enforcement. We ask the BC government to consider recycling infrastructure and end-markets for recycled materials when selecting items for the ban so that we can truly work toward circularity.
- c) Business-led waste prevention plans:** The foodservice industry is open to exploring the policy option that would require businesses to submit individual waste prevention plans. To make this option feasible for our industry, the policy would need to include revenue exemption thresholds for small and medium sized restaurants. For franchised-owned businesses, the prevention plans should be mandated at the franchisor level. These critical factors will ensure that smaller business operators do not face further administrative or financial burdens. Recognizing other jurisdictions like Ontario have taken a similar approach, we encourage the government to do a deeper dive into what is working and not working, including enforcement practices to ensure accountability and optimal environmental outcomes at all stages of the value chain (e.g., producers, haulers, MRFs, etc.).
- d) Reuse:** Restaurants Canada members have already begun implementing some reuse within their operations, whether that is front-of-house, back-of-house, or throughout their supply chains. At the same time, there are significant implications to the introduction of reuse on restaurant owners/operators, particularly where economic and environmental evidence does not support reuse. As the government considers

introducing reuse requirements for specific sectors, we share the following recommendations for consideration:

- The exemption of fibre-based packaging that gets recycled at scale from reuse requirements.
  - The adoption of a broad definition of reuse to include both consumer-facing foodware in a restaurant's front-of-house as well as back-of-house and across the supply chain (E.g., muffin trays, egg cartons) to account for all possible opportunities for foodservice operators to contribute to preventing IC&I waste from landfills.
  - Finally, we urge the government to not move forward with a “one-size-fits-all” approach to reuse, and carefully considers the nuances and specific considerations that reuse has on different sectors, and from different sources.
- e) **EPR:** Overall, Restaurants Canada is not in favour of expanding the current EPR system. The broad scale of types of institutions and sectors included within IC&I lead to varied compositions and volumes of waste. Given this level of complexity, it is unclear to our members how the system would actually operate. If and where the BC government moves forward with EPR, Restaurants Canada requests to be included in shaping the definitions and policies.

## 5. Conclusion

Thank you for providing Restaurants Canada with the opportunity to comment on the discussion paper. We understand there are discussion questions outlined in the initial consultation paper, and we are happy to have further conversations on these throughout the consultation process. We look forward to remaining engaged with the BC Ministry of Environment and Climate Change Strategy, recognizing the unique challenges facing the restaurant industry and our shared commitment to creating a circular economy.

Sincerely,

Jillian Rodak  
VP, Sustainability  
Restaurants Canada

23 July 2024

Gwendolyn Lohbrunner  
Senior Director, Circular Communities  
Ministry of Environment and Climate Change Strategy  
525 Superior Street  
Victoria, B.C. V8V 1T7

Dear Gwen,

**By email to: [Gwendolyn.Lohbrunner@gov.bc.ca](mailto:Gwendolyn.Lohbrunner@gov.bc.ca) and [circularcommunities@gov.bc.ca](mailto:circularcommunities@gov.bc.ca)**

*Retail is Canada's largest private sector employer. Over 321,000 (June 2024) residents of British Columbia work directly in the retail industry. Retail impacts hundreds of thousands of related jobs in wholesale, transportation, information technology, legal and accounting professions. The sector annually generates \$14 billion (2023 data) in wages and employee benefits for British Columbians. Core retail sales (excluding vehicles and gasoline) in B.C. were \$73 billion in 2023. The Retail Council of Canada is a not-for-profit industry-funded association that represents small, medium and large retail businesses in every community across the country. As the Voice of Retail™, we proudly represent British Columbia storefronts in all retail formats, including department, grocery, pharmacy, convenience, specialty, discount and independent retailers, as well as online merchants and quick-service restaurants.*

Thank you for the opportunity to comment on the Discussion Paper on Industrial, Commercial and Institutional (ICI) Packaging and Paper Product (PPP) waste entitled "Preventing Waste in British Columbia: Non-Residential Packaging & Paper Products."

Our response will focus on the policy options outlined on pages 21, 22 and 24.

RCC advocates for the following high-level actions:

1. Creation of a list of designated recyclable materials.
2. A province-wide landfill ban for those designated recyclable materials.
3. Legal obligation for businesses to recycle designated materials (not contained within the policy options put forth by government).
4. Producers of industrial, commercial and institutional waste take responsibility to organize and pay for the management of their own waste.

RCC asks government to ensure the following:

1. Clear definitions. This can apply to which industries, commercial businesses or institutions are obligated for an action. (For example, residential facilities are currently included in the residential system except where health care is provided: a change to that will need to be very

carefully spelled out.) This can equally apply to the definition of what is (and isn't) a small business.

2. An incremental approach where other solutions (waste management plans and sectoral extended producer responsibility) are used if and where the combination of material lists, landfill bans and obligatory recycling do not produce the desired outcomes. The effort should be to make meaningful improvements in environmental outcomes at the lowest possible cost and impact.
3. Meaningful consultation. There needs to be strong consultation with the impacted sectors: the industrial, commercial and institutional sectors impacted, regional districts and local governments, waste management service providers, and Recycle BC.

Any circumstance which leads to one retailer being obligated and a competitor selling the same products not being obligated creates a competitive price advantage for the entity not obligated: a level-playing field amongst competitors is critical.

### **About ICI Waste**

The composition of ICI waste is highly varied. Within the commercial sector itself, there is significant variance between offices, restaurants and stores. Even within retail, there is a significant variance between stores of different formats, sizes and selling different product lines, for example, grocery stores and apparel stores.

The volume of waste, and therefore the collection parameters (size of collection vehicle, type of waste, volume collected at each pickup, frequency of collection, pickup hours) varies between businesses of different types and sizes. Simply put, the needs of a big box store in a suburb or exurb are significantly different from those of a small independent retailer on a main street; the differences of those in malls and office buildings also differ from those located outside of such complexes as stand-alone stores. For example:

- Large volume businesses pick-up times are often late evening or very early morning. Small volume businesses on main streets have pick-up times with similar parameters to residential services.
- Recycling and waste management of businesses within malls and office complexes is managed by the building owner. Often these buildings are already doing significant source-separation and recycling appropriately.
- Trucks which provide waste-management service to small businesses are significantly smaller than trucks servicing large businesses.
- Varied (frequency) pickup scheduling provides the ability to do better source separation (providing better environmental outcomes) as volumes of particular resources accumulate at different rates.
- Many larger businesses have made significant investments in the last five to ten years in source separation, recycling and waste handling. These are providing significantly improved environmental outcomes and resource recovery (which are providing fiber and plastic for increasing recycled content).



- Seasonality should be a consideration in the design of any system. Many businesses generate significantly more waste during specific seasons, for example retail and restaurant businesses may generate more during holiday seasons or major events.

There are a significant number of producers who are already going over-and-above any policies outlined in the discussion paper. If a chosen option were to be, for example extended producer responsibility, an exemption is appropriate for those doing more than their share, if for no other reason, than to protect those strong outcomes.

### **List of designated recycled materials and supporting actions**

RCC is supportive of the creation of a comprehensive list of packaging materials and types that are readily recyclable. Our perspective is that this should be done in concert with the federal government, as well as those other provincial and territorial governments who are willing to participate. We are concerned that, if there are 14 – or even more – different material lists, that confusion will produce worse outcomes.

Furthermore, as much as possible our efforts should be focused both on reducing waste to landfill and ensuring that packaging material is as recyclable as possible. RCC recognizes that government has legitimate concerns about plastic waste. This must not be allowed to become the enemy of a positive outcome. Many other types of packaging have much worse end-of-life outcomes – for example, mixed-material packaging, multi-laminates and ceramics.

Over time, the effort should be to direct future efforts to ensure that packaging choices are either reusable or recyclable to the best possible outcome.

RCC's view is that a list of designated recycled **and reusable** materials is a necessary precursor to other actions by government. It will be important to develop a continuing process of engagement with stakeholders to ensure the list of designated materials remains effective and relevant as technology advances and markets for the recycled resources evolve.

Product and packaging design is done years in advance of their appearance in the marketplace. Because of the highly integrated nature of the world marketplace, most product and packaging design decisions are made outside of Canada. This demonstrates the importance of working with countries with similar economies, for example, the United States of America, the European Union, Japan, the Republic of Korea, Australia and New Zealand. It also demonstrates the benefit of a common Canadian approach (inasmuch as is possible).

Our view is that there are areas where the material list could be beneficial both in encouraging positive choices and in helping ensure that end-of-life of packaging be a primary consideration at product/packaging design. RCC does not see the material list as limited to EPR programs (which seems to be the implication of the words “inclusion in expanded EPR programs”): our view is that the list of materials is beneficial for many policy options.

We note, however, that outside of packaging and paper product waste, much ICI waste is already subject to the requirements of the Recycling Regulation. Some of that material is currently ‘orphaned’

(e.g., not managed by a Producer Responsibility Organization (PRO)). For this material, our preference would be that the existing Recycling Regulation requirements be enforced.

Finally, RCC takes the position that if there is no ability to recycle the material, it should not be listed. As recycling technology evolves, materials can be added at a time when those options are available.

### **Disposal bans for packaging materials**

RCC strongly favours instituting a province-wide ban of designated materials from landfills and would go further and require that businesses recycle materials on the list. Initially this should focus on packaging and paper product materials where there is sufficient collection, transport and processing capacity.

Bans have been well-received by businesses in the Lower Mainland and have resulted in increased recycling. Our perspective is that, paired with a list of recyclable materials and an obligation to recycle, this will make a very significant difference in the volume of PPP waste that goes to landfill.

Some businesses are already doing an excellent job managing their PPP waste. Some businesses are reliant on building owners or management for waste management and recycling. Others aren't managing their PPP waste at all. This creates the potential for significant inequities.

A business (and their customers) which is already managing their waste with excellent outcomes should not pay for those businesses who aren't to catch up. They should instead continue to benefit from their investment in excellent resource recovery, recycling and waste management.

RCC understands that this will require significant investment by businesses not currently managing their PPP waste appropriately. In some cases, this will be as simple as source separation and the identification of an appropriate waste management services provider to collect materials. In other cases, this will require significant investment in new processes and equipment, as well as staff or customer training.

There will also be necessary time to alter or scale infrastructure in recycling facilities to be able to meet the new demand and volumes.

Our view is that such change requires 18 to 24 months' notice of the ban with the caution that a longer timeframe is necessary to build recycling facilities, collection vehicles and make structural changes to buildings.

Our perspective is that all materials subject to extended producer responsibility obligations must be banned. Much of this is already banned – but the bans (often at a regional level) are not well-understood.

Our overarching concern is that strong source separation produces both better environmental outcomes and better resource values. Accordingly, RCC's view is that source separation at origin needs to be foremost in the minds of policy makers.

1. Our perspective is that “old corrugated” cardboard is both highly recyclable and valuable. Accordingly, “old corrugated” cardboard should be amongst the first materials subject to ban.
2. In terms of organics, our concern is that while most British Columbia residents have access to organic collection, not all businesses have access. Moreover, our view is that there is not currently sufficient collection or processing capacity. Accordingly, the implementation date might need to be timed to coincide with increased capacity – but a signal is necessary for businesses to invest in that capacity.

Scaling capacity and infrastructure are key for sorting and storing organic waste at the store or distribution centre level and in terms of recycling facilities to process increased volumes to meet new demands.

3. In terms of plastics, our view is that most plastic containers (except those made of oxo-degradable or compostable plastic) are highly recyclable and valuable. Our view is that these should also be amongst the first materials subject to ban from landfill.

However, our understanding is there is not sufficient collection or processing capacity for soft and flexible plastic. RCC understands governments’ legitimate interest in reducing and managing plastic volumes. Realistically, a longer implementation timeframe will be necessary to encourage investment in increased capacity here as well.

4. There are other highly recyclable materials – notably aluminum, glass and other materials. Glass has particularly poor outcomes when there is contamination. Our perspective is that these items should be in a second phase following the above items because of: (a) local governments’ concerns about “old corrugated” cardboard, and (b) societal concern about plastics.

RCC needs to acknowledge several considerations that government will need to manage:

1. Many small businesses simply have more need and less resources. Despite this, there are a significant number of small businesses already managing their PPP waste very well. Small businesses will have more difficulty in making change. RCC was opposed to the precedent of not obligating small businesses (most particularly even large businesses with only one location) at the time of the residential PPP obligation in 2011. This has left those businesses even less prepared to manage PPP waste in 2024.
2. Government funds most of the health care and educational institutions. Their cost is borne by government (and therefore taxpayers). Government has shown disinterest in increasing institutional costs.

Here, RCC’s view is that it is likely that some portion of waste from educational institutions (particularly K-12 systems) is already paid by residential PPP producers (and consumers). Accordingly, this waste may be well-managed by the residential PPP system.

For health care and other institutions, it will be necessary for government to demonstrate that

they are also taking the issue of managing their own PPP waste appropriately. This will increase health care and related costs.

3. There is disparity between collection and processing capacity accessible to different geographic areas of British Columbia. It may be necessary for government to provide financial incentives to encourage investment both in some isolated regions of British Columbia and for First Nations to build internal capacity.
4. Every political party has campaigned on affordability to British Columbia's citizens. Any changes in business waste management will necessarily increase consumer costs as the business costs cascade down to consumers.
5. Particularly if extended producer responsibility is a chosen policy option, there will be significant costs to government for increased compliance and enforcement in order to ensure an level playing field (fairness). (As a result of existing regional and local government bans and the limited number of landfill locations, bans and recycling requirements will be less costly in compliance and enforcement terms.)

In summary, RCC's supports bans because they are the most equitable way of ensuring businesses pay for the true costs of their own waste management – and produce the best environmental outcomes at the lowest cost to the consumer.

### **Reuse requirements for specific sectors**

In general, RCC favours increasing reuse options where consumers demonstrate they are willing to use those reuse options. Our first caution is that reuse options have in several cases been carefully introduced, proven unsuccessful with consumers, and been withdrawn. For example, customers' clean undamaged beverage cups are nearly always accepted for beverages: but consumers are not (yet) bringing their own beverage cups. There are also operational issues in terms of drive-through settings and deliveries. Finally, in terms of prepared food, there are a significant number of health and safety implications that need to be managed.

Our view is that the list of sources provided in the discussion paper (events, institutions, ferries, hospitals and work camps) is an appropriate place to start. At the outset, our position is that airports are not similar to the other listed sources as there is a lot of consumer movement. In addition, they are able to manage their own recycling – thus our perspective is that their PPP (and organic) waste can be banned from landfill, and they can be required to recycle their PPP appropriately. (In addition, airports have to manage waste from inbound flights which will add complications.)

For business sectors beyond those listed in the discussion paper significantly more lead time will be necessary. Product, packaging and, most particularly, system design is done years in advance and, as noted earlier in our response, with the integrated marketplace is often done outside of Canada.

Our second caution is, again, that there are always significant consumer cost impacts which come at a time there is heightened concern about food and beverage costs and general affordability.

Our industry's learnings have shown that there is a small but significant portion of the population that will actively resist and create challenges for the workers providing food or beverage service, which we seek to avoid to the greatest extent possible.

RCC is of the opinion that bylaws which ban single-use plastic but allow single-use paper fibre are workable. In the case of single-use beverage cups: the prevalent single-use beverage cup is polycoat (multi-material, paper fibre and plastic). Businesses are working on solutions, but consumer sentiment favours the current cup configuration and is resistant to change.

Before working to introduce reuse requirements, pilot programs must be developed to test various models, gather data and refine approaches. In addition, given the high cost of such programs, government may wish to consider incentives to help cushion cost impacts to businesses (particularly small businesses) and restaurants.

### **Standardized waste prevention and management actions for business and institutions**

The proposed actions in this section have dramatic operational impact and cost for businesses and therefore for their customers. In 2024, it is extremely frequent for elected officials and governments to express concern about consumer prices (and inflation): this is an excellent opportunity for government to avoid actions that would significantly increase consumer prices.

RCC favours businesses taking responsibility for their own waste: indeed, as we said earlier, we favour a legal requirement to recycle materials listed on the designated material list.

RCC notes that most regional districts and many municipalities conduct waste audits on an annual basis. Making this a requirement for businesses would mean that the waste was counted at two ends. Instead, RCC proposes that the province make use of existing regional district and local government waste audit data to determine progress. RCC notes that the Stewardship Association of B.C. has expressed willingness to expand the number of waste audits on EPR-obligated materials with regional districts and local governments.

Finally, RCC notes that should a designated material recycling list, mandatory recycling and a landfill ban be unsuccessful at making a significant difference, government can impose other new requirements (or options) that will be more costly to consumers at a later date potentially including standardized waste prevention plans for businesses and institutions.

### **Provincial data standardization and sharing**

As RCC outlined in the previous section, our view is that waste audits and waste management plans for business would cause significant inflation in the price of goods, dramatic inequity between businesses, and no discernable benefit to reduce the volume of recyclable material going to landfill.

Some large businesses may be able to produce reporting for some sorts of waste as these businesses collect that data for environmental social and governance (ESG) reporting. In the event government chooses to mandate businesses to report, RCC urges government to consult widely to avoid significant operational impacts, costs and duplication.

Alternatively, RCC's view is that standardization of **local and regional government** planning efforts and reporting (in waste management) will provide benefits to the province in terms of understanding both progress, the amount of residual recyclable material and the sources thereof. Standardized aggregated data will help enhance policymaking and resource allocation.

### **Expansion of EPR to include packaging and paper products from more sources**

RCC is firmly opposed to widespread extended producer responsibility for institutions, commercial enterprises and industries: our strongly held opinion is that recyclable materials and organic waste should be banned from landfill and all parts of society should be obligated not to send such materials to landfills. This will more accurately result in the producers of the waste being responsible for the expense and operational impacts of managing that waste. This will also provide the best incentives to reducing waste and will result in better environmental outcomes.

The revenue picture for EPR will be complicated as some obligated producers are already reporting and remitting what may be considered "commercial" packaging and paper product waste to the residential system. For example, a corrugated cardboard box may be disposed of – but also a consumer may use the box as a container for transport of purchases home.

Retail and restaurant businesses are very conscious of their reputations. Our industry wants to not only follow the law but be seen as a leader in recycling and organic waste management.

There are very significant obstacles to a widespread ICI PPP extended producer responsibility system which will result in very high costs including: the difference in composition of the waste between types of commercial businesses – as well as the difference between various industries – construction, mining, forestry, agriculture and fisheries – and the difference between types of institutions – health care, residential long-term care and education.

The issues that differences in material type create for collection, transport and processing are greatly complicated by significant variance in volume. Learning from other jurisdictions is that imposition of such systems requires significant investment and has resulted in significant disruption and indeed, at least initially, in much poorer environmental outcomes. A significant part of this results from the fact that many businesses produce cleaner and more efficiently-sorted streams of materials – a benefit that is lost with integrated collection, transport and processing.

RCC's perspective is that, with appropriate guardrails, the existing residential recycling system can provide some assistance to manage the recyclable material from a small selection of institutions and commercial enterprises – where those entities are participating equitably in paying the costs.

***If and where*** there is expansion of the residential system to fill gaps, RCC advocates for the following principles:

1. Producers must equitably pay for the portion of waste they introduce to the system.

The new producers must contribute, based upon the new volume they introduce to the residential system. This means that materials which are already reported and for which fees are paid should be accepted, but the producer should pay for any material not already reported (or for which payment has not been received by the residential system).

2. The gaps which the residential system fills must be relatively similar to the geographic areas and waste volumes already served by the residential waste sector.

While the volume collected, transported and processed may increase, the residential system must not bear an obligation to acquire and maintain different collection, transportation or processing assets than it would ordinarily require.

3. Government must understand that this will increase costs for any small businesses and institutions served. RCC's perspective is that this is equitable – but where publicly-owned, operated or funded institutions are rolled into the residential system, those institutions still must pay their own way.
4. Any expansion of the residential system to include small businesses or institutions must be accompanied by transparent reporting on costs to ensure accountability and that all parties are fairly contributing to the costs of the system.

Accordingly, RCC sees some of the following as examples of situations where inclusion in the residential packaging and paper product system may be possible, subject to government's consultations with Recycle BC:

1. Public schools. RCC recognizes that there are essentially two sources of public-school waste – that provided by the school system, and that brought in by students. In the main, the portion brought in by students will have been reported and remitted – but for that portion sourced and provided by the school or school system, either the school, school board or province will need to underwrite the cost.

Our view is that strong consultation with school districts, school leadership and Recycle BC (who have done pilots in schools) would provide more information.

2. A very limited number of ***small*** residential facilities which are currently excluded because they provide some health care. The definition will be important so as to include small residential care facilities and not include hospitals or health care settings. In this instance, most of the waste will be provided by the operator of the residence. A small portion may have been sourced by residents or their visitors. For the remainder, the operator would have to report and remit.

3. **Small** businesses operating outside of shopping and office complexes (e.g., arterial streets in communities). RCC's view is that small businesses in shopping centres and business complexes have service provided by their landlord and are not generally in need of collection service: moreover, such services are in their cases most efficiently arranged by the landlord. However, small stores and restaurants on main streets generally have lower volumes and are in areas already serviced by Recycle BC's collection network, or, where there is not blue box collection have access to a depot accepting Recycle BC materials.

Reporting and remittance for these businesses is complicated by their exemption from the residential packaging and paper product obligation by the province in 2013. However, RCC's assumption is that this can be overcome by those small businesses signing up with Recycle BC and reporting and remitting based on the volume of the recyclable material coming into those businesses – or paying a *de minimis* charge (flat fee) to participate in the system. *To be clear, this would effectively remove their exemption from the residential system and make those small businesses full participants in the residential system.*

RCC's view is this change would make the greatest difference in small, rural and remote communities where currently small businesses' recycling is not accepted at Recycle BC's depots.

Government will need to consult with Recycle BC, regional districts and business and trade associations on appropriate definitions for the eligible small businesses, as well as sizes of mall and office complexes, to provide clear operational parameters.

Finally, our suggestion is that this be, at first, a voluntary option for small businesses to reduce impacts of negative advocacy.

RCC is sensitive to the difficulties that regional districts, local governments and First Nations outside of southwestern British Columbia have expressed regarding the cost and access to direct materials such as original corrugated cardboard, some plastics and other materials to appropriate recycling channels.

For waste beyond the three categories covered above, RCC's view is that this material could appropriately be accepted by Recycle BC and/or their collectors, transporters and processors. However, RCC does not think it is equitable that businesses (and therefore their customers) pay for the waste of others. Accordingly, RCC suggests that government consider negotiating an agreement with Recycle BC to provide only those regional districts, local governments and First Nations outside the Lower Mainland and Lower Vancouver Island with access to the network for certain designated materials. The complication will be identifying who will pay to manage that waste: RCC's view is that this can be the province, regional districts and local governments. Such a system would require significant consultation with both Recycle BC and regional districts.

### **EPR stewardship for a specific sector**

RCC is supportive of a system where producers collectively manage their waste in a manner that provides better environmental outcomes. RCC does not believe this is appropriate for the retail or quick-service restaurant industries although it may be appropriate for some industries.



RCC believes there is merit in voluntary collective programs. This approach may be considered for industrial waste in sectors such as agriculture, marine waste, and other industrial sectors. However, RCC does not represent farmers, fishers, marine transport companies, cruise ship operators, mining or forestry companies. RCC suggests that government launch specific consultations with those sectors – who we expect are less likely to respond to this consultation.

### **Other waste (beyond packaging and paper products)**

RCC remains proud of our industry's leadership role in producer responsibility organizations managing extended producer responsibility roles. It remains our view that such waste is not acceptable at landfills and that enforcement should be taken against offenders.

Where there are orphaned products, it is our position that letters to those obligated producers pointing out the obligation will generally result in compliance. RCC remains, as the province is aware, concerned about free-riders and note our continuing unhappiness with the lack of compliance and enforcement actions against known free-riders.

In terms of organic waste – an area where British Columbia is a leader – our position is that where organic waste collection services are available, they are well-used. Every grocery store and nearly every retailer of food products has a well-developed organic waste disposal program.

In some cases, small businesses either are unaware of, or believe they do not have access to, organic waste collection.

### **Timeline**

RCC is sensitive to government's stated desire to accomplish change in a short time-frame. However, RCC advocates for a more realistic timeframe based on the publication of regulatory change rather than specific calendar dates. This will allow commercial businesses, institutions and industrial enterprises appropriate time to make change in a responsible and sustainable manner. It will also provide governments with appropriate time to communicate what will be significant change to British Columbians. Our suggestion for a timeline is:

Time following publication	Activity
One or two years	Implementation of landfill ban
Three years	Implementation of requirement to recycle Implementation of enforcement
Five years	Re-examination of results and consultation on further changes

In summary, RCC's view is that the proposed actions outlined above will provide the best environmental outcomes to British Columbians at the lowest cost to business and consumers. This system will, in our view, provide the cleanest stream of material to provide the best and greatest potential for the use of recycled material to provide a truly circular outcome.

Retail Council of Canada and our members are prepared to help throughout this process. If government wishes our help, please contact Greg Wilson at [gwilson@retailcouncil.org](mailto:gwilson@retailcouncil.org). Again, thank you for the opportunity to provide comment.

Yours truly,



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



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July 23, 2024

**BY EMAIL ONLY:** [circularcommunities@gov.bc.ca](mailto:circularcommunities@gov.bc.ca)

**Re: Preventing Waste in British Columbia: Non-Residential Packaging and Paper Products Discussion Paper**

Thank you for the opportunity to provide feedback on this discussion paper. We are very supportive of regulations to address non-residential packaging and paper products.

The Squamish-Lillooet Regional District (SLRD) is a local government federation, consisting of four municipalities (District of Lillooet, Village of Pemberton, Resort Municipality of Whistler and District of Squamish) and four unincorporated rural Electoral Areas (A, B, C and D), operating on the traditional territories of Sk̓w̓x̓wú7mesh Úxwumixw (Squamish), St'át'imc and Líl'wat Nations.

The south of the Squamish-Lillooet Regional District (comprising of Electoral Area D and Electoral Area C) is well connected to densely populated areas such as Whistler, Squamish and Vancouver. Service providers (hauling, collection, receiving, sorting) are available. However, as one travels North from Squamish to Pemberton or more rural areas such as Devine hauling costs increase significantly, often becoming prohibitive.

The north of the regional district (encompassing Electoral Area B and Electoral Area A) is less connected to major population centers. The steep Duffey mountain pass limits hauling from Vancouver, the nearest urban hub, Kamloops, is 171 km away from Lillooet, which is the most densely populated town in these electoral areas. Currently, Lillooet lacks private providers for receiving and sorting, and options for waste hauling are limited. While Residential recycling is accepted at the Lillooet Landfill in partnership with Recycle BC, commercial cardboard is the only additional service available. To accommodate commercial loads of paper and packaging products, the facility would need additional buildings and sorting areas.

Our answers to the discussion questions are informed by these distinct regional dynamics.

#### **Desired Outcomes**

1. Are there any desired outcomes missing from this list?
  - We are in agreement with the proposed desired outcomes and their chronological prioritization.

- Prevention-first approach, we encourage this outcome to include producer accountability for materials they produce and sell.
  - Although mentioned in the Access bullet, we would like to emphasize that small rural communities need access to cost-effective services to manage their non-residential packaging and paper (collection, infrastructure and end-market opportunities).
2. What outcomes are most relevant to your business, organization, or community?
- All are important. Some of our rural communities have no private providers for paper and packaging, making access a priority but we have heard from other local businesses, within an area with private service providers, that costs can be prohibitive.
  - Smaller communities and rural areas need a feasible approach; a one-size-fits all model does not work.
3. How would you prioritize these outcomes?
- We would prioritize in the order:
    - i. Prevention-first approach
    - ii. Consistency and confidence
    - iii. Accountability and transparency
    - iv. Access
    - v. Maximize material Recovery
4. Are there indicators or measures of success you would suggest are used to determine if an outcome is achieved or is achievable?
- Institutions, commerce and industry (ICI) are to submit disposal reports and waste audit results every 5 years (various requirements should be developed to match the organization).
  - Reporting (verified by a third party if possible) about where the material go (similar to existing EPR programs requirements). The data should be made public and should be reported by regional district (as one of the metrics).
  - Stewards Association of BC (SABC) should create a data portal for all EPR reporting to be accessible to the public.

### **Provincial Target Setting**

5. Should non-residential packaging targets be the same, or better than existing residential packaging targets? Why or why not?
- The targets should be higher with a phased approach as current EPRs have demonstrated that the 75% capture rate is too easy to achieve by focusing on densely populated urban centers.

- Rural and First Nation (access/coverage) targets should be considered in addition to the general capture rate target.
6. What types of targets would be most useful? Reduction targets; reuse targets; recycling targets; diversion targets?
    - There should be targets for reduction, reuse, recycling and coverage/access measures (spatial and percentage of population).
  7. Should there be regional or business specific targets in addition to provincial targets? Why or why not?
    - Yes, there should be business/sector specific targets in addition to provincial targets as this motivates action and measure progress. There should also be regional targets to ensure access is consistent rather than mostly in urban centers.
    - New targets should be added as old targets are met.
  8. How can we measure success or progress against established targets?
    - Data must be collected and made public. Transparency holds parties accountable.
    - The province should consider licensing haulers and require detailed reporting including material type, customer type.

### **Regional and Local Actions**

9. What actions are best suited at the local, regional, or provincial level of government?
  - As stated above the province should consider licensing haulers and require detailed reporting which should be made public.
  - Empower and support local governments (including regional districts) to enact requirements for three stream source separation or more and bans.
    - i. Developing provincial templates for municipalities and regional districts would be a great supporting tool.
  - The province should ensure there are adequate financial incentives for small communities to maintain services. There are often grants to build infrastructure but there is a lack of support for service continuation.
10. What factors should be taken into consideration if the province enables or promotes local actions?
  - Set up a policy working group of municipalities and regional districts so collective wisdom can be shared.
  - Rigorous public engagement from the province
  - The province should provide financial support to local governments to conduct waste composition studies and reporting.

## Policy Approaches

11. What is already working to prevent packaging waste – for businesses, institutions, haulers, local governments?
  - EPR for residential PPP with mandatory reporting and audits with producers paying a significant amount of the cost.
  - Disposal bans.
  - The SLRD does not have a general solid waste bylaw requiring source separation but does have facility bylaws requiring separation prior to disposal at the receiving waste facilities. However, the requirements vary significantly based on the service level/diversion options available at each facility.
  - Member municipalities have three stream separation bylaws.
12. Are there other actions that should be considered? What are they?
  - EPR is needed for ICI PPP
  - Three stream (or more) collection should be supported by the province (through pre-approved bylaw templates, infrastructure updates or other tools as mentioned above).
  - A comprehensive provincial education and communications system on waste on topics that are applicable throughout the province (e.g. hazardous waste, proper disposal, the importance of landfill diversion, the BC recycling system, etc.)
  - Financial support for small communities would help achieve the access and consistency goals.
13. What are the benefits or limitations of these waste prevention options?
  - They are but one component in the suite of policies required to drive design and production in the right direction.
14. How ready are organizations, businesses, governments to implement?
  - Some more than others, requires a phased approach and support.
  - Specific support will be required for small ICI – a one size fits all will not be successful for them
15. How should implementation be prioritized?
  - Work with the existing system for PPP where it makes sense rather than segregating institutions from routes as an example. Introduce flexibility when possible, to accommodate smaller communities.
  - Approach should be based on the pollution prevention hierarchy with rethinking and redesigning as part of the Reduce.
  - It is important that small businesses see EPR regulation as a benefit that will save time and money.

- There is a need to ensure smaller communities get serviced from EPR programs and not require local government subsidies.
- The approach should be by material type
- The province should standardize the waste composition study system and obtain funding from SABC. Standardized data portals where this information is made public should be developed in collaboration and funding from SABC.
- Develop various fees based on hard to recycle certain materials/environmental toxicity are as an incentive for producers to rethink their packaging.
- Financial incentives should be based on the cost of managing material types (e.g. foam is costly to store, haul, handle due to its large volume but incentives do not cover costs).

### **EPR Approaches**

#### 16. What are the benefits or limitations of expanded EPR options?

- Benefits:
  - i. Existing framework, systems and markets.
  - ii. Producers pay the majority of the cost.
  - iii. There should be flexibility for the existing EPR (Recycle BC) to partner with the ICI PPP program on routes and facilities especially in smaller/rural communities where segregation is not an option due to lack of infrastructure or financial reasons.
- Limitations:
  - Access/lack of service outside of dense centres
  - Contractual agreements that may not be to the benefit of local governments.
  - Segregation/exclusion, perhaps the paper and packaging program should have been developed on material type rather than consumer type.
  - Financial incentives vary widely based on the EPR, some require local government subsidies. Should be consistent and not require local government subsidies.
  - Some EPR awareness and education campaigns are much more robust than others. Local governments are required to subsidies and conduct the communication work.

#### 17. How ready are organizations, businesses, and governments to implement an expanded form of EPR?

- Governments:

- i. Would require support to update infrastructure to meet the proposed desired outcomes of consistency and access, as there are currently no private providers (receiving and sorting) in some small/rural communities.
    - ii. There is a need for widespread education/workshops to ensure governments understand their roles.
  - Businesses/commerce, institutions and industries:
    - i. Many are ready but other less so. There is a need for widespread education to ensure ICI understand their roles (as an end user or as a producer). The province should be fully responsible to undertake education including workshops, partnership with chamber of commerce, etc.
18. Are there sectors or materials that should be prioritized to be included or excluded?
  - If there are some that are more challenging than others for specific producers, those could be phased in later but should be held accountable to find solutions from the beginning. Aim to get the easy work done first iron out the wrinkles later.
19. How should implementation of EPR actions be prioritized (e.g. by sector, by material, by geographic location)?
  - Prioritize the areas outside urban areas, essentially where service is more robust. It is needed in those more rural areas as there are fewer waste haulers and often no ICI recycling. It needs to be paired with hauling/collection for Recycle BC for efficiency/central locations and possibly processing.
  - All necessary materials for collection at facilities should be provided, including, but not limited to pallets, recycling bags, plastic wrapping film, baling wire to name a few examples, currently subsidized by local governments.
20. Other issues identified:
  - Need to eco-modulate producer fees based on recyclability and environmental toxicity.
  - EPR cannot solely focus on collection rate, it needs to support full access to services and prioritize redesign, reuse and then recycling (not just collection)
  - Health care could be its own sector for certain products.
  - A federal plastic registry would play an important role in managing the types of plastics being used by producers and distributed within the province.

Yours Truly,

SQUAMISH-LILLOOET REGIONAL DISTRICT





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Marie-Lou Leblanc  
**Resource Recovery Coordinator**

Vanessa Lafontaine  
**Communications & Projects Coordinator**

CC Omar Butt, Environmental Services Director (via email only)



Minister George Heyman  
Ministry of Environment and Climate Change Strategy  
RE: Preventing Waste Outside the Home

PO Box 9341 Stn Prov Govt  
Victoria, BC V8W 9M1  
Email: CircularCommunities@gov.bc.ca

July 23, 2024

Surfrider Foundation Canada (SFC) is pleased to provide feedback and recommendations to the Government of British Columbia (B.C.) as you develop policies to prevent waste from non-residential packaging, plastic, and paper across the province. As a nonprofit organization dedicated to the protection and enjoyment of the ocean, beaches and waves, for all people, we are vested in supporting policies that prevent upstream sources of waste.

We suggest that the Government of B.C. embrace the zero waste hierarchy (instead of the pollution prevention hierarchy). This means focusing on reduced consumption, lowering toxicity, waste reduction and materials reuse over recycling, and recycling over energy recovery or disposal. This way, materials are kept out of landfills, incinerators and the environment and are used at their highest value to support a circular economy. This approach will support a stable climate, an increase in employment, as well as a healthier environment.

At SFC, we have been leading shoreline cleanups in B.C. for over 15 years, acting as the first defence against plastic pollution shipping spills, the ongoing incoming surge of plastic marine debris from the industrial, commercial fisheries and institutional sectors, as well as leakage from ineffective waste management systems. Based on our experience, we have a direct understanding of the challenges posed by non-residential packaging and plastics. We also know how these challenges require innovative and robust solutions, and the urgency of the triple planetary crisis demands that we act efficiently and swiftly.

Our following recommendations draw on best practices, scientific research, waste reduction studies and reports, and our experience conducting and collecting data from countless shoreline cleanups in B.C. By integrating this feedback into future policies, B.C. can lead the way in a circular economy that eradicates waste and maximizes resource and energy efficiency. We look forward to collaborating with you and other stakeholders to achieve these goals.

## **I. Expand the Ban**

To build on the existing *Single-Use and Plastic Waste Prevention Regulation*, we call for an expansion of the ban to include these next six categories of single-use plastic manufactured items that are commonly found in schools, workplaces, industrial sites, etc.

- 1) All takeout containers, coffee cups and lids
- 2) Sachets, pouches and wrappers
- 3) Bags, film and wrap
- 4) Cigarette filters
- 5) Produce stickers
- 6) Plastic packaging on fruits and vegetables

We further call for the elimination of the following highly problematic polymers, chemical additives and types of plastic products:

Polymers:

- 1) Polyvinyl chloride (PVC)
- 2) Polystyrene
- 3) Polyurethanes
- 4) Fluorinated polymers

Chemical additives:

- 1) Per- and polyfluoroalkyl substances (PFAS)
- 2) Phthalates
- 3) Bisphenols
- 4) Brominated flame retardants
- 5) Chlorinated paraffins
- 6) Benzotriazole UV stabilizers

Additionally, we recommend a ban on single-use amenities from accommodation providers for shampoo, conditioner, body lotion, body wash, toothpaste and mouthwash, including plastic bottles, sachets, pouches and paper. This ban can also be executed through the existing *Single-use and Plastic Waste Prevention Regulation*. We also recommend adopting accessibility language that creates flexibility for accessibility rooms so that people with disabilities can access more mobile amenities. Of course, these rooms can still contain reusable alternatives.

## **II. Reduction**

- There is a need to emphasize reduced use of packaging overall, minimize the use of packaging, and decrease overall material throughput.

- Reduction targets for virgin material production for non-residential packaging. Several economic instruments can be employed, such as virgin material taxation, taxation on single-use packaging, waste prevention taxation (including pay-as-you-throw, landfill, and incineration taxation)
- Optimize products and packaging to minimize waste and use fewer resources during production and transportation. For instance, eliminating water from all cleaning and detergent products will result in a more concentrated product and thus compact packaging that uses less materials and creates less emissions in transport.
- Establish a moratorium on any new plastics production facilities in BC.

### III. Reuse & Refill

- Adopt sector-specific minimum requirements for reusable packaging systems, supported by a series of packaging and system-specific standards on reusable packaging, including clear definitions and harmonized packaging dimensions.
- Setting province reuse and refill targets, like 15% by 2027 and 50% by 2040 ([see France legislation](#)), including a 100% reusable target for eat-in consumption in the hotel, restaurant and catering sector.
- Enforce the measures by requiring a mandatory reporting mechanism on reuse/refill targets.
- Retail spaces bigger than 400m<sup>2</sup> must provide reusable containers for products sold in bulk - whether free of charge or otherwise.
- Mandate that festivals, sports games and other public events switch to reuse systems that stand up to strong environmental standards, including reusable mugs and cups.
- Mandating that public access buildings be equipped with water dispensers for free refill.
- Introduce financial incentives and other supportive mechanisms for businesses investing in reusable packaging and reuse systems. This can include tax breaks, grants, or subsidies to make the transition to reusable packaging more economically viable.
- Reduce the investment and operating costs of reusable packaging systems through increased interoperability.
- Maximise environmental benefits and economic viability by setting durability requirements.
- Maximize material recovery: the inclusion of recovery of products for reuse should be included as well, where collection systems may also be used to support broad reuse systems (like beer bottles, but expand to reusable cup programs, wine bottles and others).

#### IV. Extended Producer Responsibility & Labelling

- Ensure that reuse, where possible, is the conventional approach within EPR programs and include firm targets for reuse systems.
- Ban the use of waste-to-energy for mixed municipal solid waste and EPR programs to ensure that the highest and best use of materials is pursued, rather than providing a loophole for waste.
- Prohibit the use of the chasing-arrows symbol and other recyclability claims on plastic packaging, as well as terms like “degradable” and “biodegradable” in the labelling of plastic packaging and single-use items. For items to be considered “compostable”, they need to meet extremely stringent standards that are made collaboratively with the industrial composting industry and made from regenerative materials like seaweed and mushrooms (as opposed to GMO compostable products made from corn and soy, which are extremely problematic for the environment).
- Packaging labels should contain information on plastic packaging that is not visible so that consumers can make an informed choice, including boxes with products wrapped or contained in plastic inside. An insidious example of this is plastic tea bags, which also contaminate compost streams and should be banned.

#### V. Additional:

- Examine the amount of pre-production pellets spilled at recycling plants and regulate nurdles under the *Environmental Management Act*, requiring recycling companies to take a supply chain approach to reduce pellet loss ([see more information in this brief by Fidra](#)).
- Prioritize reducing greenhouse gas emissions associated with material recovery.
- There are major gaps in the market of recycled content. We need fiscal mechanisms to incentivize the procurement of recycled materials.
- An additional outcome of this consultation should be no packaging going to landfills, waste-to-energy, cement kilns, pulp mills or any other form of destruction or disposal.
- Increase equitable access to waste management in First Nation communities, as well as for reusable systems and other waste prevention services.

We're grateful for the opportunity to share our insights and feedback as part of this provincial consultation. We strongly believe that British Columbia can become a global leader in the zero waste movement, and continue taking leaps to end the triple planetary crisis that is exacerbated by waste and pollution.

Sincerely,



Lucas Harris  
Executive Director  
Surfrider Foundation Canada

## **Commercial Waste Streams**

At Island Health, we face significant challenges with the types of waste streams accepted at a commercial level. Recyclers do not accept commercial glass, resulting in all our glass waste being sent to the landfill. Additionally, we are currently experiencing difficulties with recyclers accepting our soft plastics due to it coming from a healthcare facility.

There are also different waste streams available commercially in different regions. For example, the South Island region offers commercial composting services, while other regions do not. Food waste is our highest waste stream besides garbage. Sites located in regions that don't offer commercial composting services see the impacts on their diversion rates.

## **Standardized Recycling Processes**

Vancouver Island has different regional waste management processes which pose significant challenges for education and standardization. For instance, the South Island region requires the segregation of all waste streams, whereas the Central and North regions allow for mixed recycling, as their recycling facilities have the capacity to sort materials. Island Health has sites across the Island with staff and patients moving between regions for work and to access health care services. This interregional movement, coupled with differing recycling processes, increases the likelihood of improper waste disposal.

Implementing a standardized recycling process across the province would simplify recycling and in turn, reduce contamination rates.

## **Transparency From Commercial Recyclers**

A misconception we here from internal stakeholders is the belief that recycling is not properly processed and is instead sent to the landfill. This perception greatly diminishes enthusiasm for recycling. To address this, we propose requiring recyclers to publicly report the amount of recycling they receive and the amount that is recycled. Instances where recycling is diverted to the landfill, we ask for transparency regarding the reasons.

Increased transparency from commercial recyclers is essential to build trust among our staff and patients and to encourage more participation in recycling efforts.

## **Extended Producer Responsibility Program**

We need increased enforcement at the procurement level with the types of containers and packaging materials used for supplies. For instance, we recently experienced a change in a product's container from a recyclable plastic bottle to a glass bottle. Vancouver Island does not

offer commercial glass recycling, resulting in these glass bottles being sent to the landfill. We propose that procurement prioritize sourcing products packaged in recyclable materials or require suppliers to take back containers, such as glass bottles, for reuse or recycling.

Additionally, only a few units receive products in Styrofoam packaging. Styrofoam is a recyclable material but due to the minimal quantity we receive compared to other waste streams, we can't justify allocating space for a Styrofoam recycling bin on our loading dock as space at all sites is very limited. We recommend placing pressure on suppliers to take back their recyclable materials to either reuse or recycle. For example, Styrofoam coolers used to keep products cold could potentially be reused rather than discarded.

By enforcing these measures at the procurement level, we can reduce the amount of recyclables sent to landfills.

### **Stigma Around Healthcare Waste**

There is a stigma around healthcare waste which makes it hard to recycle certain items. Any plastic items that look medical is not accepted in the recycling despite it being safe to recycle. We propose offering more education to recyclers about healthcare waste.





July 22, 2023

Ministry of Environment & Climate Change Strategy  
PO Box 9341 Stn Prov Govt  
Victoria, BC V8W 9M1

Via: [circularcommunities@gov.bc.ca](mailto:circularcommunities@gov.bc.ca)

**RE: Feedback re: Preventing Waste in British Columbia: Non-Residential Packaging & Paper Products Discussion Paper**

The Waste Management Association of British Columbia (WMABC) would like to thank the Ministry of Environment & Climate Change Strategy (Ministry) for the opportunity to provide input on the Non-Residential Packaging & Paper Products Discussion Paper. The Association is pleased to support the provincial government's leadership efforts to increase the diversion of waste from disposal and the environment and repurposed for reuse as part of the burgeoning circular economy.

The following submission by the WMABC provides comments of concerns held by the private waste services industry on EPR regulation in the Industrial, Commercial & Institutional (IC&I) sector as well as addresses discussion questions proposed in the discussion paper. These will be provided in two parts.

By way of background, the WMABC is composed of over 70 independent companies of private waste and recycling service providers, processors, and suppliers with over 5,000 employees province-wide, that provide the majority of the waste and recycling services across the province. As a dominant actor in the waste management services sector in B.C., we have and continue to provide a critical leadership role in the delivery of environmentally responsible, efficient and cost-effective waste diversion, recycling and disposal services for the municipal and the IC&I sector.

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.

We are ready and willing to work with the Ministry on this important regulatory initiative.

Sincerely,

Lori Bryan  
Executive Director

c. Grant Hankins. President

## Waste Management Association of BC Comments on EPR Regulation of the IC&I Sector

The WMABC appreciates that the MOE&CCS has recognized and listened to the concerns of the unique challenges that the IC&I sector bring. As included in the discussion paper, rural and urban communities are served very differently due to the services, transportation and processing capacity available. As such, the diversion rates here also differ.

The IC&I sector is well serviced by the private sector in urban centers and those regions in closer proximity to Urban centers e.g. FVRD, central Island regions. It isn't that services are not available to the IC&I sector but participating in recycling usually comes down to cost of services. As with any business costs, this too is a cost of doing business. Service providers work with their IC&I customers to tailor their waste & recycling needs to their businesses and are guided by provincial and/or municipal regulations as well as work on cost savings wherever possible. The WMABC has long advocated for a waste & recycling plan section on city business license applications, to encourage businesses to put thought into their waste services plans.

We would see some merit in including smaller businesses in certain sectors being included in the residential RecycleBC program. This could potentially be determined by metrics of business size, revenue, number of employees, etc. Again, in urban areas, these businesses are usually serviced by the private sector.

It is important for the MOE&CCS to understand the definition of IC&I within the waste & recycling Industry. The definition in the discussion paper, of non-residential IC&I removes the strata / multi-family buildings from IC&I. This sector is included in the IC&I category due to the nature of contracts and how it is collected. Separating this out for an EPR program would increase costs due to additional collection trucks on the street, additional separate collection, increased GHGs, etc. This must be considered in the overall definition.

When considering any type of EPR in the IC&I sector, it must be open and competitive versus the monopoly that is the current residential PPP EPR program. When MMBC now RecycleBC first came into play 10 years ago, many private or non-profit depots closed due to the materials no longer coming to them. This was particularly true in the rural jurisdictions and immediately affected ICI collections. Additionally, many service providers would or could not participate as collectors due to the restrictive nature of the collector contract. In relation to competition, the majority of these IC&I customers have contracts with their service providers and any new policy or regulation could be considered to induce breach of contract.

It is important to consider competition in drafting policy. Government policy almost always affects how businesses in Canada can compete. Government policies can impact:

- how easily new firms enter and expand;
- how freely firms set the price, quality, and quantity of their products and services;
- the incentives firms have to compete; and
- how easily consumers can switch between competitive alternatives.

## DISCUSSION PAPER QUESTIONS

### Preventing Packaging Waste

**In reference to the Pollution Prevention Hierarchy**, we have not seen a reduction in packaging waste entering the market, only limited capacity options for reuse, recycling and ultimately recovery. Producers of these materials should be making a concerted effort to reduce overall packaging that enters the market, while funding end of life costs. This is a responsibility of the producers that they have failed at.

## **Proposed Outcomes**

**Prevention-first approach:** The prevention-first approach, while is a priority, does not address the above comment of reducing packaging waste from first entering the marketplace.

**Consistency and confidence:** Consistency comes from having capacity and viable end markets available province wide or availability of transport options. Incentives for investment in the processing sector will help provide the consistent availability for materials recycling.

**Accountability and transparency:** Agree

**Access:** The IC&I sector is well serviced by the private sector in urban centers and those regions in closer proximity to urban centers such as the FVRD, central Island regions, etc. It isn't that services are not available to the IC&I sector but participating in recycling usually comes down to cost of services. As with any business costs, this too is a cost of doing business. Service providers work with their IC&I customers to tailor their waste & recycling needs to their businesses as well as work on cost savings wherever possible. Indigenous and rural and remote communities hold unique challenges and will require alternative options.

**Economic benefits for a strong circular economy:** agree

**Maximize material recovery:** Incentives to attract investment and innovation are needed.

In some regions, the availability and prohibitive cost of industrial lands to host waste processing activities is often exacerbated by restrictive bylaws governing the issuance and longevity of building permits.

For example, in some regions, a building permit for public sector entities is granted in perpetuity, while the same license for private sector proponents can be as low as five years. This makes it virtually impossible for the financing of these important infrastructure projects.

*Q. Are there any desired outcomes missing from this list?*

As has been included above, keeping a competitive and open market must be included and considered.

*Q. What outcomes are most relevant to your business, organization, or community?*

Economic benefits and maximum material recovery are most relevant to our members, along with affordability.

## **Opportunities**

The WMABC supports outcome-based approaches that are not prescriptive allowing the private market latitude to bring innovation technologies and services forward. These programs should be regulated by the province to create a level playing field as well as allow for synergies between regions.

*Q. Should non-residential packaging targets be the same, or better than existing residential packaging targets? Why or why not?*

These targets must consider the unique landscape of the IC&I sector and it must be determined what those targets would look like for individual sectors within IC&I.

*Q. What types of targets would be most useful? Reduction targets; reuse targets; recycling targets; diversion targets?*

Reduction targets, recycling targets and diversion targets will achieve best desired outcomes.

## **Supporting regional planning and local actions**

**Q. What actions are best suited at the local, regional, or provincial level of government?**

- allowing for source separation policies at the generator level
- not dictating regional boundaries to allow for best use opportunities for processing, including costs associated with processing (no hauler licensing schemes)
- setting final disposal restrictions on outgoing materials from processing facilities. Enforces maximum material separation.

**Q. What factors should be taken into consideration if the Province enables or promotes local actions?**

Competitive and open market. Local capacity and infrastructure.

## **Policy approaches to address non-residential packaging**

Policy option: List of designated recycled materials and supporting actions

RE: Oregon Recycling Modernization Act example. This is a major piece of legislation and one distinction between Oregon's EPR and other states is that Oregon's requires the Producer Responsibility Organization to be a non-profit. This went from 4 companies interested, to only one. This speaks to how complicated and cumbersome the act is and to competition issues. Some concerns that have been raised are contaminations, enforcement, timing of funding, educational outreach, burdens on processors, haulers, and local government for compliance. Many of the smaller cities don't have staff to manage such robust recycling programs, so as you can imagine it is being pushed onto the haulers. Oregon service providers are currently in the process of filling out a 100-question survey for most jurisdictions for the PRO.

Any option should not be this much of a burden to those involved.

Policy option: Disposal bans for packaging materials

We have advocated for a provincial disposal ban vs a patchwork of regional and municipal bans. Any disposal ban program needs to focus on generator accountability to ensure compliance. Start where it begins in the hands of the consumer. This supports the initiative to remove these materials. Along with producers funding the collection and processing in the R&R communities, this allows for more diversion of materials out landfills.

Policy option: Reuse requirements for specific sectors

Sectors such as hospitals already require unique disposal options, and these have been taken up by the private sector.

Other select sectors may not require all recycling services and so the private sector usually tailors the services to these needs.

Events and dine-in would be able to better institute re-use options

Policy option: Standardized waste prevention and management actions for businesses and institutions.

Example: Ontario – O.Reg 102/94 – \*\* please see note below

Policy option: Provincial data standardization and sharing

Example: California – Solid Waste Characterization

The California waste landscape is very different from BC and has extremely cumbersome policies in place. More research into those differences will establish what will not work for BC.

*Q. What is already working to prevent packaging waste – for businesses, institutions, haulers, local governments?*

We are seeing minor packaging changes coming from businesses, for example Amazon recent policies. These are a small needed change but we are not seeing this uptake at scale.

Hauling service providers offer the services to their customers along with the education needed and do see participation levels increasing. With innovative investment in capacity infrastructure, this will allow for more competitive services to be offered.

## **Extended Producer Responsibility Programs**

### **EPR approaches to address non-residential packaging**

*Q. What are the benefits or limitations of expanded EPR options?*

Targeting a specific sector such as agriculture would be an opportunity to pilot, evaluate and reproduce for additional sectors. Increased costs to the specified sector must be considered. Is the service readily available?

*Q. How ready are organizations, businesses, and governments to implement an Expanded form of EPR?*

There must be adequate capacity for these materials, reasonable access and not add to the affordability issue.

*Q. How should implementation of EPR actions be prioritized (e.g. by sector, by material, by geographic location)?*

Each implementation action has its own unique challenges and must be considered. Capacity for identified materials must be in place. Geographical location restricts access to facilities. Separate sectors potential for increased costs must be considered.

**\*\*** We would like to take some time to delve into this policy option to better understand the policy and provide our comments at a later date. We understand this is after the feedback deadline.

RE: Preventing Waste Outside the Home

Hi there,

I'm writing on behalf of BC Green Business – a non-profit program that works with small to medium sized businesses across the province on identifying and implementing tangible initiatives to reduce their environmental impact. BC Green Business has assessed and provided recommendations for over 300 businesses across the province in numerous sectors including office, retail, F&B processing, restaurants, accommodations, fleet-based businesses, spas/salons, manufacturing, agriculture, and more. As a result, we have a unique perspective on the needs of the SME community across the province as well as the regional trends and challenges that businesses face.

The following is a list of items that we see as crucial for the province to address in order to reduce waste across the province:

- Flexible plastic collection facilities that accept materials from commercial sources (often only accept residential waste/small quantities)
- Accessible and affordable collection services for businesses for flexible plastics & organics (only available in Metro Vancouver and the CRD)
- Accessible and affordable access to basic blue bin recycling services for businesses in ALL rural communities
- Availability of reliable and affordable food packaging options including reusables and "backyard" compostables/fiber-based containers
- Fund the R&D of packaging innovation
- Funds to pilot, promote, and educate regional reuse programs
- Accessible signage templates that businesses can use to educate their staff & customers on proper waste diversion practices
- Textile recycling drop-off and processing facilities
- Access to clean and potable tap water and encouragement to switch away from bottled water
- Creating a circular economy platform for material reuse and exchange
- Action plan to incorporate a minimum recycled materials content in all paper and plastic products being produced or sold in BC.

As a large network of highly motivated and values-driven businesses, it's apparent to us that businesses are willing to do the work to reduce and divert waste but they need access to services that enable this work to be done.

We would welcome further conversation with the Provincial Government of BC as you continue to strategize for waste reduction.

Thanks for considering our input,

Jarret Klim, Program Manager

BC Green Business



July 23, 2024

## ZWBC Feedback for Clean BC's Preventing Waste in BC – Non-residential PPP Discussion Paper

Thank you for the opportunity to provide feedback on this discussion paper for which the need is becoming more urgent every day as the throughput of material grows. We are **very supportive** of regulations to address non-residential packaging and paper products. Our current resource consumption systems of linear-take-make-waste not only create waste but also generate a huge amount of greenhouse gases which constitute some of the discharges that threaten the environment and human health. In addition, the production of all of this material contributes to loss of habitat and biodiversity.

Zero Waste BC is a non-profit association dedicated to driving systemic change towards Zero Waste in BC. Zero Waste is the conservation of all resources by means of responsible production, consumption, reuse, and recovery of products, packaging, and materials without burning and with no discharges to land, water, or air that threaten the environment or human health. Our feedback is based on this definition and the [Zero Waste Hierarchy](#).

### 1 Framing

We concur that disposal includes both landfilling and incineration (definition page 5) but raise the concern that while correctly outlining the concerns about landfills (page 7), without also noting the even greater harms caused by waste to energy that some may conclude that system is preferable. Ideally the province would adopt the Zero Waste Hierarchy (instead of the pollution prevention hierarchy shown on page 11) and ban the use of waste to energy for mixed municipal solid waste and EPR programs to ensure that the highest and best use of materials is pursued, rather than providing a loophole for waste. A significant amount of time and resources continue to be spent on seeking to destroy materials instead of prevention of waste. Inclusion of the Rethink/Redesign step in the hierarchy at the top will ensure systems start to look at the areas that can have maximum impact.

The Circular Economy inset on page 7 is a good outline but should include the fundamental first step which is to reduce the throughput and use of material and reduce the use and creation of toxic materials.

The guiding principles (page 16) are sound but need to include the words “are used” in the second bullet.

## 2 Outcomes

We make the following recommendations:

- Prevention-first - “Actions are prioritized using the **Zero Waste** hierarchy, resulting in a focus on **reduced consumption, lower toxicity**, waste reduction and materials reuse over recycling, and recycling over energy recovery or disposal. Materials are kept out of landfills, **incinerators** and the environment and are used at their highest value to support a circular economy.
- Consistency -we are pleased to see the mention of paper so that a focus on phasing out some uses of plastics does not just result in the substitution of single use items made of paper.
- Accountability and transparency – while producers may be considered covered under the term “businesses”, adding the term “producers” may make it clearer that they have a particular role to play.
- Access -we fully support the focus in First Nation communities. We also think that small communities also need equitable access to services.
- Maximize material recovery -the inclusion of recovery of products for reuse should be included here as well where collection systems may also be used to support broad reuse systems (like beer bottle, but expand to reuseable cup programs, wine bottles and others).

## Discussion Questions

1. Are there any desired outcomes missing from this list?
  - There is a need to emphasize reduced use of packaging overall, minimize the use of packaging, and decreasing overall material throughput. Our research for the [ZW Agenda for BC](#) report showed that despite an increase in diversion from 2008 to 2018, there was an even more significant increase in the consumption of materials, leaving the disposal weights very similar.
  - An additional outcome should be Zero Waste of packaging with none of it going to landfill, waste to energy, cement kilns, pulp mills or any other form of destruction or disposal.
  - Producers need to take responsibility and be held to account for what they create and sell.
  - Small communities need access and measures that drive collection/service in areas outside of the large urban areas. Service should be paid for by producers and not require subsidies from local governments.
  - There is a need to make it simple and clear for businesses to reduce their waste and ensure what remains is sorted into at least three streams (organics, recycling, disposal) and note that it may be more cost effective to work at scale
  - Hard to recycle items -need to drive change and reduction, not just more expense for those (e.g. C&D strapping is hard to recycle so a different system should be encouraged for holding materials together)
  - Focus on reuse and reusable packaging, will reduce volume and also quality issues



- While not noted specifically, there is a concern that requirements for recycled content should not be a method to continue to allow unsuitable packaging; policy needs to tie back to producers to drive systemic change.
  - The quality of material when using recycled content needs to be considered to ensure there are no health or toxicity problems, no impacts on durability, and no unintended consequences of being forced to use recycled content (plastics)
  - There is the need to avoid a monopoly/monopsony for key services by a privately -led entity.
2. What outcomes are most relevant to your business, organization, or community?  
All are important.
3. How would you prioritize these outcomes?  
We would prioritize in the order of 1,2,3,4 and 6
4. Are there indicators or measures of success you would suggest are used to determine if an outcome is achieved or is achievable?
- Plastics registry data on total plastics used (aim to get similar info on other materials) which needs to be decreased, then % of what is out there reused/recycle/captured. Include how much is captured by EPR programs and how much was not returned
  - Details on kinds of materials per type (how much is designed for reuse and recycling for plastic, paper, glass, metal, etc.) and degree of recycled content
  - Packaging use per capita
  - Possibly some measure of packaging use per industry sector
  - Reductions in use of virgin packaging
  - Use of reusable packaging and cycles of use
  - Disposal of packaging (total and per capita)
  - Total disposal of all waste per capita (with a series of decreasing targets) of waste
  - Number of ICI locations without three stream systems
  - Reporting (verified by third party if possible) about where materials go (similar to existing EPR program requirements but a bit more stringent)
  - Reporting on processing systems within BC (number, types, changes or improvements)
5. Should non-residential packaging targets be the same, or better than existing residential packaging targets? Why or why not?
- They should be higher because the residential ones are too low. It is unfortunate that 75% remains a static goal in the Recycling Regulation when many programs have achieved far more and been allowed to decline in capture. The ultimate target for all systems should be 100% capture by 2035 with interim targets. Have penalties to producers for failure (which are set higher than the cost of complying). There needs to be a strong focus on enforcement and having more control with ICI, using the learnings from the rollout of MultiMaterial BC. There

should also be a goal of 20% reduction in total materials throughout every five years.

6. What types of targets would be most useful? Reduction targets; reuse targets; recycling targets; diversion targets?

- There should not be targets for diversion (though it should be reported), but reduction, reuse, recycling (both capture and ultimate recycling when sold as a material to be put back into similar products), and awareness among the ICI sector. There should also be targets for coverage (ultimately set at 100% with interim targets). There should also be targets provincially for positive regulations (similar to the provincial target for population covered by organics disposal bans) that could cover the % of population with dine in requirements, deconstruction bylaws, three stream sorting requirements, etc.).
- There could also be goals to support local circulation of food and products.

7. Should there be regional or business specific targets in addition to provincial targets? Why or why not?

- Yes, there should be targets by sectors that produce certain kinds of materials, as well as regional targets to ensure that it is not just urban areas that get action and service. Access measures -there should be targets to ensure all municipalities, and First Nation communities that opt in, get fulsome services.
- New targets should get added as the situation evolves, such as for bans in certain single use items (not already covered) or restriction on the use of single use water bottles). There also needs to be an incentive to change behaviour and locations that offer free disposal undermine policy s there should be a target to have 100% of locations charge for disposal and then a subtarget on those that have different forms of Pay As You Throw. A policy and target supporting the use of clear bags for disposal should also be added
- Targets are important to motivate action and to be measure progress against.
- Targets that get watered down over time (previous commitment to 350 kg/capita by 2020) or disappear (75% of population covered by organics disposal ban was considered complete rather than raise it once reached) create disillusionment.

8. How can we measure success or progress against established targets?

- It is important to gather the correct data and then make it public for transparency. There are serious data gaps in the existing system that need to be rectified. Data that needs improved is the total waste disposed. The province should license all haulers and require data reporting by material type, customer type and any materials that cross regional or provincial borders. From a producer perspective, the federal plastics registry will cover one material but the province could also consider tracking the other materials to have a more complete picture and understand shifts in the material flows and types.

9. What actions are best suited at the local, regional, or provincial level of government?
- Ideally the provincial government would look at what materials and products are for a province-wide ban. This will save local government from needing to enact it locally and should drive materials to EPR programs (rather than the existing system of local governments waiting for EPR programs to provide adequate service locally before enacting bans). The province should require the service. Consideration of enforcement (and by whom) and perhaps a phased approach - starting with audits, education, warnings and then later, penalties is suggested.
  - Also at the provincial level: waste hauler licensing, waste hauler mandatory reporting (with data anonymized but made public for all province, by municipality, First Nation community and RD), action on online deliveries and packaging. Where cross community services make data reporting difficult, a system to provide estimates based on a sound method should be used.
  - The province should enact requirements for solid waste reduction plans as part of business licensing (including provisions to fill in gaps for areas where regional districts may not license businesses).
  - If any of the above are not pursued at the provincial level, empower local governments (including regional districts) to do them plus enact requirements for three stream source separation or more mandatory services, packaged services for all waste hauling, franchising areas, and bans of any type of single use item
  - Develop provincial templates so mostly harmonized and pre-approved for local governments to enact (including RDs).
  - Provide support to switch to reusable beverage and takeout ware systems province-wide.
  - Empower local governments to make their own bylaws regarding this without requiring each one to get provincial approval.
10. What factors should be taken into consideration if the Province enables or promotes local actions?
- If the Province plans to take an action soon, then it should set out the scope for local governments to adopt the policy early (as occurred for many single use items); if not, empower local governments to regulate as they choose. Set up a policy working group so different municipalities can test out policy on different items and collective wisdom can be shared.
  - The Province should consider the following: what crosses boundaries and is better done at the provincial level and data needs.
11. What is already working to prevent packaging waste – for businesses, institutions, haulers, local governments?
- EPR for residential PPP with mandatory reporting and third-party audits is working to have an established program with verifiable data and producers paying a significant amount of the costs.

- Product bans at different regulatory levels are working and should be expanded. Similarly, some disposal bans are having an impact as well as three stream sorting requirements.
  - Voluntary actions by some businesses and industry have also had an impact but need to be regulated to level the playing field.
12. Are there other actions that should be considered? What are they?
- EPR is needed for ICI PPP
  - Possible additional taxes on problematic products or materials.
  - There should be a clear bag mandate province-wide.
  - A provincial levy on all disposal should be added to fund these provincial programs (and encourage all disposal sites to charge fees and have staff oversight of disposal).
  - Three stream (or more) collection should be mandated.
  - Systems should support cameras and scales on hauler trucks to capture better information
  - A comprehensive provincial education and communications system on waste.
13. What are the benefits or limitations of these waste prevention options?
- We need all of them. As noted in the CCME Canada-wide Action Plan for EPR, EPR is not meant to be a stand-alone solution but part of a suite of policy that drives design and production in the right direction, helping to internalize many of the costs currently externalized today. We cannot just continue with siloed action but instead must implement a comprehensive, systemic plan.
14. How ready are organizations, businesses, governments to implement?
- Some more than others so requirements should be phased in.
15. How should implementation be prioritized?
- Each of these actions are key priorities but the phasing may look different and should be coordinated. Focus on the large distributors for key impact- for example -food suppliers - like GFD, and Sodexo. It is important to make sure small businesses see EPR regulation as a benefit that will save time and money and be implemented in better way (The Province should build the cost-benefit case for the transition for the businesses). There is a need to ensure smaller communities get service from EPR programs and not require local governments subsidize services. Where enforcement is required, consider the ability to enforce it and if there is a burden on bylaw enforcement. The system also needs to be robust -for example consider the impact of market value change where cardboard is now much less valuable so there is a need to market-proof the systems and go beyond recycling. Note that recycling costs continue to increase and allocating these costs to producers (not end users) is essential.
- List of designated recycled material and supporting actions -should also include designate reusable products with supporting action.

- Disposal bans should be enhanced by creating a maps showing which areas have specific bans in place and working with RDs and local governments to ask who wants to be next to roll out new ones. Work to have a uniform map by 2030. That includes all easily recycled materials and all EPR programs. Include First Nation communities where they opt in and it is feasible based on waste systems. There is a need for fines and enforcement plus better solid waste composition audits as noted below).
- Reuse requirements will require the development of a specific plan that will be voluntary (with provincial support) to start and become mandatory by 2030. Single use items in foodservices including dine in requirements) should be the starting place and include the sources noted in the discussion paper. There should be strong incentives to start with.
- Waste prevention plans will also require the development of a specific plan that will be voluntary (with provincial support) to start and become mandatory by 2030 and include targets and ongoing development of tools and support (such as coaching and template plans by business type) based on the results. Reduction should be given a higher priority than recycling and organics composting and waste to energy should not be supported. It is key that this is paired with EPR of non-residential packaging so that there are incentives for producers to change design and offerings. This policy option could be phased in starting with audits then support for developing plans with standardized expertise and eventually making it a requirement (with some benefit for early adopters). It could be modelled on the Canadian Digital Adoption Program for improving marketing and technology with a list of qualified service providers to help develop plans, where organizations sign up for it and it may be subsidized by government and producers. Create a similar track for Small/ Medium business to encourage service providers and help businesses. Several non-profits and local governments have already assisted with aspects of this (e.g. Synergy, Ocean Ambassadors, District of North Vancouver, Squamish for waste audits and support).
- Provincial data standardization and sharing should start with licensing all waste haulers/facilities, plus requiring EPR for ICI PPP and improved data collection from local governments. The database of this information will be required for waste planning at all levels and to set and monitor progress on targets. Data on reuse, and waste prevention initiatives and services should also be included.

The Province should standardize the waste audit system and get funding from SABC. The Province should coordinate waste audits to ensure coverage across the Province and adequate funding from the stewards while the Province and local government should divide up the non-EPR material costs. The Province should work with local governments on data collection, rotation around the province to ensure sound data. Local governments who wish to conduct waste audits more often than 5 years can Data needs to made public and transparent.

16. What are the benefits or limitations of expanded EPR options?

- The benefits could be myriad: synergies with existing programs and systems, costs driven back to producers so possibly gains in prevention and design change, especially if the program plan is actually required to follow the hierarchy (such as supporting reusable grocery containers like crates, bread trays, etc.). There is a need to ensure efficiencies by pairing with Recycle BC collection (allow small business to use residential systems where suitable), transport (particularly for smaller communities and First Nation communities), and possibly processing (regional, not program specific). There is a need to make the PRO a utility to ensure the best system and not prone to competition/non-competition issues. Ideally a new Crown Corporation is created to run the program to ensure that the issues identified in the roll out of the Multi Material BC program do not reoccur (disappearance of some well-qualified small businesses, lack of service in some areas, not adequately compensating local government service providers, challenges with access to markets for non-participants, lack of competition among service providers, etc.). By ensuring an EPR program, the costs are borne by the producers, not each small business and public institution (and fees on products may incent lower consumption). It follows the premise of no charge at end of use. When all ICI organizations have service, there could be synergies in the routes. There could be consideration of ensuring that waste hauling always includes a single rate that always includes all three streams (recycling options, organics collection and disposal) instead of allowing for selecting only some services. A bounty for the services could be offered to service providers instead of awarding winner take all contracts and allow service providers to compete based on service.

17. How ready are organizations, businesses, and governments to implement an expanded form of EPR?
  - Many are ready already but others less so. There is a need for a widespread education campaign to ensure businesses, institutions and local governments understand their roles (as an end user or as a producer).
18. Are there sectors or materials that should be prioritized to be included or excluded?
  - None should be excluded but if there are some that are more challenging than others for specific producers, those could be phased in later -aim to get the easy work done first and iron out the wrinkles later.
  - There needs to be support for reusables in EPR systems and an assurance that reuse is rewarded, not penalized.

19. How should implementation of EPR actions be prioritized (e.g. by sector, by material, by geographic location)?

Policy Option 1. Expansion of EPR to include packaging and paper products from more sources. If needed, this could start with all areas outside urban areas in Metro Vancouver, Capital Regional District and the Fraser Valley Regional District (essentially where services may already be more robust). It is needed in these more rural areas as there are fewer waste haulers and often no ICI recycling. It needs to be paired with hauling /collection for Recycle BC for efficiency/central locations and possibly processing.

- PPP for all ICI packaging should be implemented (with an option to include a phase for the geography above or just do it all at once).
- It should include service to all retailers, accommodations, food services and offices.
- There could be possibly some kind of franchising to protect small haulers' access to market but also get rid of multiple trucks running in areas every day when one would do. Creative thinking and a Crown Corporation (instead of industry-led PRO) is needed to ensure the key outcomes are reached without the acknowledge pitfalls of the existing system.
- Pallets should be included
- Consideration of a de minimus clause to ensure small organizations are not targeted initially but with a clear schedule for onboarding those businesses in later years and Recycle BC requirements should be changed in concert with this.

Policy Option 2. EPR stewardship for a specific sector

- The Clean Farms program should be regulated quickly.
- Health care could be its own sector for certain products.
- 

20. Other issues identified:

- Some costs have shifted but there is still a significant subsidy from local governments for facility costs and services
- EPR cannot solely focus on a collection rate, it needs to support full access to services and prioritize redesign, reuse and then actual recycling (not just collection).
- some ICI businesses are already paying for system when they buy products intended for residential market
- Need for ecomodulated non-visible fees
- Need for EPR programs to invest in R&D -support innovation
- The Recycling Regulation needs an update to require programs and measurement for the upper part of hierarchy.
- Advocate for a strong plastics treaty that includes a significant decrease in plastic production.
- Do not allow new plastics production facilities in BC.

Once again, thank you for the opportunity to provide feedback and we are happy to discuss these comments.

Sincerely,

Sue Maxwell  
Director,  
Zero Waste BC

August 7, 2024

Circular Communities | Environmental Policy & Initiatives Branch  
Ministry of Environment and Climate Change Strategy

Sent via email: [circularcommunities@gov.bc.ca](mailto:circularcommunities@gov.bc.ca)

Dear Director,

**Re: Non-Residential Packaging & Paper Products (PPP) Discussion Paper**

Thank you for the opportunity to provide feedback on the Province's discussion paper: *Preventing Waste in British Columbia: Non-Residential Packaging & Paper Products (PPP)*. City of Victoria staff commend the Province of BC on initiating this important consultation phase as part of the Plastics Action Plan and Circular Communities Strategy.

City of Victoria staff support the Province's objective to continue advancing strategies that place the full responsibility for the collection and recycling of materials onto the producers who introduce these products into our community, while also recognizing that prevention, reduction and reuse should be prioritized over recycling and recovery.

As an island community surrounded by ocean on three sides and the business and tourism hub of the region, the City of Victoria plays an important role in both reducing the environmental impact of unnecessary packaging and supporting our community's transition to a circular economy.

Municipalities like ours have a unique opportunity to work closely with our business community on solutions that reduce packaging waste—actions that can be expediated with provincial support and enabling legislation. The vision for *Zero Waste Victoria*, the City of Victoria's plan to reduce the volume of waste sent to landfill by 2040, is a future community where nothing is wasted; where reducing, reusing, and repurposing materials is the norm and residual materials are managed responsibly.

**ALIGNMENT WITH ZERO WASTE VICTORIA**

City staff have identified key takeaways in your discussion paper that complement current City of Victoria initiatives to reduce industrial, commercial and institutional (ICI) waste under *Zero Waste Victoria*. These initiatives and directives include:

- Introduce bans and/or fees for single-use items with proven sustainable alternatives.
- Facilitate the establishment of reusable container services.
- Reduce and divert waste at special events.
- Require the source separation of recyclable materials across the community.
- Improve access to recycling depots.



- Ensure the corporation leads the community in packaging and paper reduction and diversion.

City staff support and encourage a provincial circular packaging strategy that follows the pollution prevention hierarchy by prioritizing waste avoidance, reduction and reuse before diversion and recommend the following key actions and considerations. Responses to the specific questions outlined in the discussion paper are listed later in this letter.

## **RECOMMENDATIONS**

Our recommendations are separated into two categories. The first focuses on opportunities the Province has to improve the management of non-residential packaging waste, while the second describes opportunities to support and empower local governments.

It is important to emphasise that local government action should not be a substitution for robust provincial programs. The Province has a much broader range of policy tools and authority and can leverage larger economies of scale than the sphere of influence of any specific municipality. However, local governments often have better access or direct connections with their business and institutional communities and, in some cases, can provide locally or regionally scaled services.

### **Provincial Opportunities**

#### **1) EPR prioritized for provincially regulated institutions (e.g. hospitals, schools, post-secondary institutions, government buildings).**

Other provinces have Extended Producer Responsibility (EPR) for PPP from institutions either in place or planned which the Province could replicate. For example, Nova Scotia's new EPR for PPP Regulations includes schools under the targets for materials from residential sources.

As the discussion paper highlights, Quebec's new PPP EPR framework will include all generators, not just residential, public space, and school sectors as it currently does. To prepare for this, producers will have to report materials destined for the ICI sector, something the Province could consider employing as a first step to expanded PPP EPR for the ICI sector.

*(Please see responses to discussion questions 16, 18 and 19 for more details.)*

#### **2) Reuse requirements for business-to-business packaging (pallets, totes, wraps, etc.).**

In their baseline data collection, the Canadian Plastics Pact (CPP) found there to be a significant amount of reusable PPP employed in the ICI sector already, including totes, pallets, crates, trays and pressurized containers that account for hundreds of thousands of uses per year.

Consequently, there is scope to prioritize business-to-business (B2B) reusable packaging thanks to the action already taken and the advantage of this being a more controlled closed-loop operating model. Reuse requirements for items such as wood pallets would also help take the burden off local governments to ban and/or find processors and end markets for these materials. The initial B2B reuse practices identified by the CPP indicate an opportunity for the Province to investigate how common these practices are, opportunities to scale through regulation or incentives, and learn what makes these practices successful and what infrastructure or service would allow B2B reuse to expand into new areas.

The Province could also consider adding criteria in the *Recycling Regulation* for stewardship plans to both include specific requirements for producers to invest in reuse infrastructure and

incorporate financial incentives for producers to transition to reusables. Once infrastructure is in place and efficiencies are achieved, reuse will be the obvious best financial and sustainable option.

(Please see responses to discussion questions 6 and 8 for more details.)

### **3) Need to ensure PPP materials are consistently collected and managed responsibly.**

The Province needs to ensure the full responsibility of materials recovery is placed on the producers when considering expansion to the ICI sector.

## **Opportunities to Empower Local Governments**

### **1) Enable requirements for reusable products for jurisdictions with community readiness.**

Many progressive municipalities have communities that are ready to implement reusable programs in a number of settings, including on-site dining in restaurants and at event venues and sports stadiums. The regulations that are developed at the municipal level can inform model bylaws and encourage other jurisdictions to adopt similar policies, potentially leading to these waste reduction measures being harmonized across the province.

The Province can enable this action by further amending the Minister's Regulation to allow reuse-ready municipalities to enact bylaws that are already in place in another BC municipality without needing to seek Ministerial approval.

Public perceptions about convenience, hard-to-recycle materials and resource constraints will continue to pose challenges for waste reduction targets and circular packaging strategies. Local governments alone cannot change these forces, and any provincial policy direction must include a comprehensive system for ensuring compliance, monitoring progress and reporting results.

(Please see responses to discussion questions 10, 11, 13 and 14 for more details.)

## **DISCUSSION PAPER QUESTION RESPONSES**

*Note: Questions have been selected for response according to City staff experience with and understanding of the subject matter.*

### **2. What outcomes are most relevant to your business, organization, or community?**

The City of Victoria's Zero Waste strategies prioritize circular systems that keep materials at their highest and best use for as long as possible, and advocate for better management of materials across their entire life cycle. Relevant outcomes to support this work include:

- Applying a waste prevention-first approach, including a circular packaging strategy that prioritizes reduction and reuse over diversion (versus simply expanding EPR).
- Continuing to place the full financial responsibility of end-of-life packaging management on producers.
- Reuse initiatives, enabling legislation and target setting to scale-up reuse infrastructure.
- Confidence that programs will be available and materials are being reused and recycled at their highest value regardless of where they are generated.
- Reliable, transparent systems of collecting data to show progress towards targets.

### **3. How would you prioritize these outcomes?**

As the first outcome listed, pollution prevention should always be prioritized and any policies to manage materials need to achieve the highest and best use of these materials. Outcomes should follow this priority order:

- Reducing packaging where possible—including setting up systems for reusable packaging—should be the primary goal for a provincial circular packaging strategy.
- Provincial leadership and financial support for reuse infrastructure to move from single-use to reuse models is one of the biggest opportunities to reduce waste from packaging at the source.
- Placing the full financial responsibility of recycling residual materials from the ICI sector on the producer.
- Setting stringent reporting requirements to create transparent systems for collecting data, displaying progress in waste prevention and assurance that materials collected are being recycled as intended.
- Removing obstacles for municipalities to implement policies mandating reuse.

### **4. Are there indicators or measures of success you would suggest are used to determine if an outcome is achieved or is achievable?**

If actions are to be prioritized using the pollution prevention hierarchy with a focus on waste prevention, reduction and reuse over recycling, some key indicators to measure success could include:

- The number of single-use items eliminated from distribution.
- The volume of unnecessary packaging eliminated from the market.
- The volume of hard-to-recycle packaging (e.g. multilaminate and composite packaging) reduced, redesigned or eliminated.
- The number of reuse or refill options in grocery and retail stores.
- The number of jurisdictions with reuse requirements.
- The number of businesses and institutions submitting pollution prevention plans.

### **5. Should non-residential packaging targets be the same, or better than existing residential packaging targets? Why or why not?**

It is difficult to set targets without rigorous baseline data, including both material volume and the diversion potential for each stream to work from, therefore City staff recommend the Province focus on gathering more material and sector-specific data before setting targets to ensure that:

- Targets for non-residential packaging are ambitious and data-driven but feasible, increasing over time as the capacity to achieve them improves.
- EPR policy targets are designed to prioritise actions at the top of the waste hierarchy and should include a clear and detailed set of quantitative targets for reduction, reuse and recycling.
- The Province could consider setting requirements for large-scale businesses and institutions to provide waste prevention plans, and report on specific waste management data annually as a tool to assist with target setting.

Along with the example given from Ontario in the discussion paper, several jurisdictions in the United States require large and medium-sized businesses to develop waste prevention plans and to report non-proprietary information regarding waste generation, waste management, and recycling on an annual basis to monitor waste reduction progress and more accurately measure diversion targets.

## **6. What types of targets would be most useful? Reduction targets; reuse targets; recycling targets; diversion targets?**

Since the diversion potential varies greatly by material stream, existing processing infrastructure and end markets, City staff recommend the Province work closely with current recycling facilities, haulers and processors to determine capacity first before setting recycling and diversion targets.

Setting ambitious reduction and reuse targets should follow a prevention-first approach. To incorporate reduction and reuse targets, the Province could potentially replicate the targets set out in the European Union (EU) Packaging and Packaging Waste Regulation (PPWR) aimed at preventing the generation of packaging waste, reducing it in quantity, promoting reuse and refill options by setting mandatory reuse targets, restricting over-packaging and unnecessary packaging and establishing design criteria so all packaging can be recycled.

## **8. How can we measure success or progress against established targets?**

The EU PPWR<sup>1</sup> aims to avoid unnecessary packaging and advance recycling. Under the regulation, manufacturers and importers must ensure that the packaging they place on the market is designed so that “its weight and volume is reduced to the minimum necessary for ensuring its functionality”.

Additionally, the PPWR includes substantial B2B and retail reuse targets, including:

- Operators using transport packaging or sales packaging for transport (pallets, plastic crates, pails, and trays) need to ensure that at least 40% of the packaging used is reusable packaging within a system for re-use (rising to 70% in 2024).
- Distributors selling alcoholic and non-alcoholic beverages in sales packaging shall ensure that at least 10% of the packaging made available is reusable packaging within a system for re-use (rising to 40% in 2040).

Reuse targets in EPR programs can be achieved by requiring producers to invest in reuse infrastructure and by incorporating financial incentives for producers to transition to reusables.<sup>2</sup>

In BC, measuring success against established targets is difficult given the unknown destination of some materials generated across the community. City of Victoria staff are aware that a portion of the waste generated by the ICI sector is disposed outside the region, resulting in an incomplete picture of the true volumes and flow of materials in the province.

To both mitigate this and complement waste-reporting requirements for businesses, the Province could consider implementing waste hauler licensing across BC, requiring haulers to report on materials collected and disposed to fill existing data gaps, create accountability and ensure transparency.

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<sup>1</sup> Packaging and Packaging Waste Regulation. (2024). European Parliament. Retrieved from: [https://www.europarl.europa.eu/doceo/document/TA-9-2024-0318\\_EN.pdf](https://www.europarl.europa.eu/doceo/document/TA-9-2024-0318_EN.pdf)

<sup>2</sup> Principles for Reuse in EPR & DRS. (2024). Upstream. Retrieved from: <https://upstreamolutions.org/blog/epr-policy-principles>

## 9. What actions are best suited at the local, regional, or provincial level of government?

The following actions are best handled at a provincial level and must include a comprehensive system for reporting on compliance and monitoring progress:

- EPR programs
- Recyclable materials lists
- Waste hauler licensing and reporting
- Material bans

Regional districts typically operate landfills and facilitate enforcement therefore are suitable for actions such as:

- Disposal bans
- Setting requirements for source separation of recyclable materials

Local governments are best situated for actions such as:

- Requirements for reusable food service ware for dine-in services
- Waste reduction and reuse requirements for events and entertainment venues

However, province-wide reuse requirements across sectors would level the playing field and may help to expediate the scalability of reuse programs and infrastructure, especially if there is sufficient funding allocated.

## 10. What factors should be taken into consideration if the Province enables or promotes local actions?

Local governments continue to shoulder the high cost of managing waste associated with the overproduction of packaging. Enabling local governments to enact bylaws that restrict unnecessary single-use packaging and require the use of reusable products is within the scope of municipal strategies to address local waste challenges.

However, the task of reducing waste from unnecessary packaging should not fall completely on local governments, especially those with limited resources to implement programs and enforce regulations. Local governments require financial resources given the limited options available for municipalities to generate revenue that offsets the rising costs of downloaded responsibilities.

The current Spheres of Concurrent Jurisdiction in the *Community Charter* make it burdensome and uncertain for local government to design regulations for the protection of the natural environment. The Province could consider amending the Community Charter or, at minimum, document a clear process to follow when seeking provincial approval on a regulation.

In the meantime, the Province should develop an expediated review process for regulations requiring Ministerial approval that supports the significant municipal work done to date and results in an impactful and consistent regulatory approach that realizes the environmental and economic benefits of single-use packaging reduction across communities.

## 11. What is already working to prevent packaging waste – for businesses, institutions, haulers, local governments?

Local governments have a unique relationship with their licensed business sector to work on waste reduction solutions together that meet individual communities where they're at.

Many local governments have implemented bylaws that limit single-use packaging distribution, encourage proper disposal of packaging waste, and phase out the most problematic packaging items. The City of Victoria developed one of the most comprehensive checkout bag regulations - now replicated in the provincial *Single-Use and Plastic Waste Prevention Regulation* (SUPWR) - that reduced the waste from approximately 7 million single-use plastic bags annually.

The City's new *Single-Use Items Reduction Bylaw* is anticipated to prevent the waste from up to 60 million single-use items disposed annually across the community by requiring businesses to use reusable products for on-site dining. City staff have noticed some businesses already making the switch to reusable products ahead of the bylaw implementation.

However, the social values and the systems required to meet local waste management issues, as well as community readiness for waste reduction policies will vary across jurisdictions.

## **12. Are there other actions that should be considered? What are they?**

City staff recommend the Province consider the following additional actions to expediate the prevention and reduction of unnecessary packaging and to better manage non-residential packaging:

### **A. Amendments to the SUPWR or Minister's Regulation to further reuse initiatives**

City of Victoria staff recommend expanding the provincial *Single-Use and Plastic Waste Prevention Regulation* (SUPWR) to include requirements for food and beverage service providers to use reusable products for on-site dining, or further amending the Minister's Regulation to allow reusables for on-site dining requirements in municipal bylaws.

### **B. Province-wide reuse requirements for hotels**

The province could consider following similar policies of the EU PPWR<sup>3</sup> to further reduce unnecessary single-use packaging waste by prohibiting all single-use packaging for cosmetics, hygiene and toiletry products for use in the accommodation sector (e.g., shampoo bottles in hotels).

### **C. Flow control measures**

Local governments have identified waste flow management as a critical issue impacting each regional district's ability to regulate the movement of solid waste and recyclable materials as outlined in the *Environmental Management Act* (EMA). Flow control is an important regulatory tool to support the implementation of solid waste management plans, ensure the long-term financial sustainability of the system and guarantee feedstock for the establishment of new facilities.

Requiring haulers to transport locally-generated waste to transfer stations, landfills or other sites chosen by local officials would guarantee feedstock and provide valuable waste stream data. The Province could engage the federal government to consider introducing a waste export levy to disincentivize BC-generated waste from being shipped to the US and overseas.

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<sup>3</sup> Packaging and Packaging Waste Regulation. (2024). European Parliament. Retrieved from: [https://www.europarl.europa.eu/doceo/document/TA-9-2024-0318\\_EN.pdf](https://www.europarl.europa.eu/doceo/document/TA-9-2024-0318_EN.pdf)

#### D. Shared, interoperable system for reuse and recycling

One of the barriers to successfully scaling reusable packaging programs is ensuring that the packaging gets returned through a user-friendly experience. A concept that co-mingles returnable, reusable packaging with recyclables has been piloted in the US that shows this solution is possible, where modifications to the existing recycling infrastructure can be made to make the recovery of reusable materials viable.<sup>4</sup> This model could be replicated in BC through a partnership between local governments, tech companies and recycling facilities with support from the provincial Circular Economy Innovation Category (CEI) category of the Clean BC Plastic Actions Fund.

### **13. What are the benefits or limitations of these waste prevention options?**

#### Benefits of reusable packaging systems

- Over their life cycle, most reusable products have lower greenhouse gas emissions compared to disposable alternatives.
- When materials are reused, there is a reduction in lifecycle energy use and the associated GHG emissions.<sup>5</sup>
- Reusable packaging can help lower municipal costs for providing street cleaning and waste collection, litter pickup in parks and beaches, and limit impacts to sanitary and storm infrastructure.
- There is a documented cost-savings for businesses switching to reusable packaging.<sup>6</sup>
- While some operational challenges exist to transition to reusables, restaurants in Europe, the USA and Canada, including fast food establishments, have proven that it is achievable.

#### Improved waste data collection and tracking through standardization

- Requiring businesses and institutions to submit waste prevention plans would help identify priority areas for waste reduction, reuse opportunities and expanded recycling.
- Requirements for large-scale businesses and institutions to report on specific waste management data annually would help to monitor waste reduction progress and more accurately measure diversion targets.

The Province could consider providing guidance for waste prevention plans and waste audits to businesses and institutions to improve consistency and reduce the burden of waste planning.

### **14. How ready are organizations, businesses, governments to implement?**

As a service provider, the City of Victoria's solid waste collection and planning teams have been effective in leading material reuse, diversion and waste reduction initiatives in the community through strategic service enhancement, policy changes and infrastructure investments.

The City of Victoria has a number of circular packaging initiatives as directed by Council to accelerate the community transition to reusable alternatives by:

- Advocating for onsite reusable dining policies
- Providing guidance on circular solutions for take-out containers

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<sup>4</sup> The Recirculation Project. (2019). Don't Waste Durham. Retrieved from: <http://www.dontwastedurham.org/the-recirculation-project>

<sup>5</sup> Reuse Wins Report, Upstream. (2021). Retrieved from: <https://upstreamolutions.org/reuse-wins-report>

<sup>6</sup> Rethink Disposables. Reusable Food Serviceware Guide 2015 Case Studies. Stop Waste & Clean Water Action CA <http://www.rethinkdisposable.org/resources>

- Delivering reuse marketing campaigns
- Collaborating with hospitality partners to reduce the impact of single-use items from this sector and;
- Contributing to broader federal and international circular packaging strategies.

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.

During engagement for the *Single Use Items Reduction Bylaw*, City of Victoria staff heard from several food service businesses that voiced their support for policies that set reusable requirements to level the playing field and ensure all businesses are working towards mutual sustainability goals. City staff also heard from businesses a desire for a more streamlined approach to recycling packaging and a desire for transparency about the end use of materials.

Several food service businesses in Victoria have already initiated reuse for patrons dining on the premises ahead of formal regulations, including franchise chains Starbucks and A&W. Additionally, some local coffee roasteries in Victoria already employ B2B reusable packaging solutions by using returnable and refillable totes for wholesale retail clients.

### **15. How should implementation be prioritized?**

As emphasized in the discussion paper, a range of policy actions will be necessary to manage non-residential PPP. City staff recommend the policy considerations be prioritised by:

- Improving provincial baseline data to more effectively select policies and set targets
- Initially expanding EPR PPP for provincially regulated institutions (e.g., hospitals, schools, government buildings).
- Waste reporting and waste prevention planning requirements for large businesses and institutions.
- Reuse requirements for business-to-business packaging (e.g., pallets, totes, wraps).
- Enabling reuse requirements for dine-in services and venues for jurisdictions with community readiness.

### **16. What are the benefits or limitations of expanded EPR options?**

Successfully implementing EPR for PPP from the ICI sector may decrease contamination in the waste stream, potentially encourage fewer non-recyclable or hard-to-recycle products entering the waste stream, and decrease the cost of collecting, sorting, and processing waste.

However, there is a high potential to overwhelm collection systems and recycling infrastructure if this program is not phased in.

One problematic outcome of the current model of EPR for residential PPP is that producers tend to collect and recycle the materials that are most cost-effective, while the remaining materials are landfilled or enter the environment, both of which incur a high cost to manage.

The Province needs to ensure the full financial responsibility of material recovery is placed on the producers when considering expansion to the ICI sector so that municipalities and regional districts are not left to manage and pay for residual materials, as is often the case with current EPR programs. Prioritizing reduction and reuse while at the same time putting measures in place to ensure expanded EPR programs successfully capture all materials will be necessary to reduce the financial burden for local governments.



## **18. Are there sectors or materials that should be prioritized to be included or excluded?**

An EPR PPP program for provincially regulated institutions (e.g., hospitals, schools, government buildings) should be prioritized. If expanded EPR will obligate specific materials, the Province would need to identify materials that are generated in sufficient quantity and that can be recovered successfully with existing waste management infrastructure.

## **19. How should implementation of EPR actions be prioritized (e.g. by sector, by material, by geographic location)?**

City staff recommend prioritizing EPR for PPP in institutions such as schools, hospitals, care facilities and government buildings as a first phase as this can be implemented province-wide. The program could then be expanded to event and entertainment venues and other commercial closed-loop sectors, including airports and ferry services.

## **Concluding Remarks**

City staff applaud the Province for prioritizing policy approaches that focus on waste prevention, reduction and reuse as well as exploring the expansion of EPR to ensure the full responsibility for the collection and recycling of packaging is placed on producers.

We understand that managing non-residential PPP is a complex issue with many possible opportunities that will require a strategic combination of actions and a phased approach to be successful. To best achieve the policy outcomes identified in the discussion paper, City staff recommend the following priority actions:

- Require waste reporting and waste prevention planning for large-scale businesses and institutions to fill data gaps, set realistic targets and monitor progress.
- Prioritize provincially regulated institutions for initial EPR expansions to better understand material volumes, flow and both hauler and processing facility capacity.
- Set reuse requirements for B2B packaging.
- Require producers to invest in reusable packaging infrastructure.
- Enable local reuse requirements for a range of business settings, including dine-in services and entertainment venues, for jurisdictions with community readiness.

The City of Victoria has continued to demonstrate its commitment to reducing problematic single-use items and unnecessary packaging and fully supports the Province's intention to develop policy approaches that will improve the prevention and recycling of non-residential (ICI) packaging waste in communities across BC.

Thank you for considering our input and we look forward to supporting with the next steps

Sincerely,



William Doyle  
Acting Director, Engineering and Public Works  
City of Victoria



## **B.C Health Authorities response to the open engagement on non-residential plastic packaging.**

Written Submission response to the questions posed in the Discussion Paper [Preventing Waste in British Columbia: Non-Residential Packaging and Paper Products Discussion Paper \(gov.bc.ca\)](#)

*Response compiled by Sarah Scanlan Regional Sustainability Consultant, Energy and Environmental Sustainability Team ([sarah.scanlan@vch.ca](mailto:sarah.scanlan@vch.ca)).*

*We would like to acknowledge the subject matter expertise contributions of Marianne Dawson, Sustainability Advisor PHSA Procurement, Colin Chan, Regional Leader Sustainable Clinical Services & Cameron Lock Waste Lead Interior Health, Provincial Waste Technical Services Team Lead.*

August 6<sup>th</sup>, 2024.

### **Background**

The health sector in Canada is one of the greatest polluting industries globally contributing to every class of waste and 4.6% of greenhouse gas emissions, making it one of the worst health systems per capita in terms of environmental impact. The climate crisis is a health crisis, described in the research as the ‘greatest public health threat of the 21st century’.

While the intensity of high-quality care delivery in Canada contributes to the impacts of climate change, as a sector it is also extremely vulnerable to the impacts. Infrastructural damage to facilities from extreme weather events, increased patient presentations for climate related illnesses such as respiratory illnesses due to air pollution from wildfire smoke or heat stroke/cardiovascular illnesses from increased temperatures add stress to an already stretched health system as was witnessed in B.C with the heat dome of 2021. The increase demand for care also further increases pollution, exacerbating the problem. The principle of ‘First do no harm’ needs to extend to the planet, as planetary health is essential for human health.

The COVID-19 pandemic exacerbated the need and market for single-use plastic items in healthcare, leaving behind a legacy of throw away plastic products. Waste segregation in healthcare has not recovered with many of these plastic items still ending up in biomedical waste or garbage destined for incineration or landfill. Strict infection prevention and control policies post the pandemic in some areas of healthcare are making the transition (back) from single-use plastic products to reusable items challenging. With the majority of health authorities in B.C. adopting planetary health strategies there is buy in and senior leadership support to improve the sustainability of the health system in B.C. However, provincial



government support with service delivery and direction will be pivotal in ensuring standardized sustainable change to plastic waste management.

## Section 1

### 1. Are there any desired outcomes missing from this list?

The list of outcomes provided is comprehensive. We have a few recommendations on the extension of the outcomes for the health care setting. A further recommendation for consideration would be the benefits of plastic waste reduction and appropriate management to the natural environment and to human health.

- Benefits to the Natural Environment and Human Health.

Many plastics contain toxic chemicals which are extremely damaging to human and environmental health. Many plastics utilized have endocrine disruption, carcinogenic and reprotoxic properties. Microplastics have been found in humans including in blood, lungs and placentas. This means that before a baby is born, they have already been exposed to plastic pollution. The report linked below by Healthcare Without Harm goes into the detailed impacts of plastic pollution on human health. Hospitals use high volumes of single-use plastics to treat vulnerable populations such as children, the elderly and the immunocompromised. These groups are more susceptible to the toxic chemicals in plastics and are already recognized as disproportionately impacted by climate change.

The report also references a journal article in the American Chemical Society's Journal concluding we have crossed a planetary boundary in terms of chemical pollution to the environment and to threatening human rights including our right to reproductive health. Our demands in healthcare for plastic products are leading to further production and consumption which is further fueling the climate crisis and extending the pollution problem.

[Plastics and health - An urgent environmental, climate and health issue | Health Care Without Harm \(noharm.org\)](#)

[2023-05-Towards-PVC-free-healthcare\\_0.pdf \(noharm-global.org\)](#)

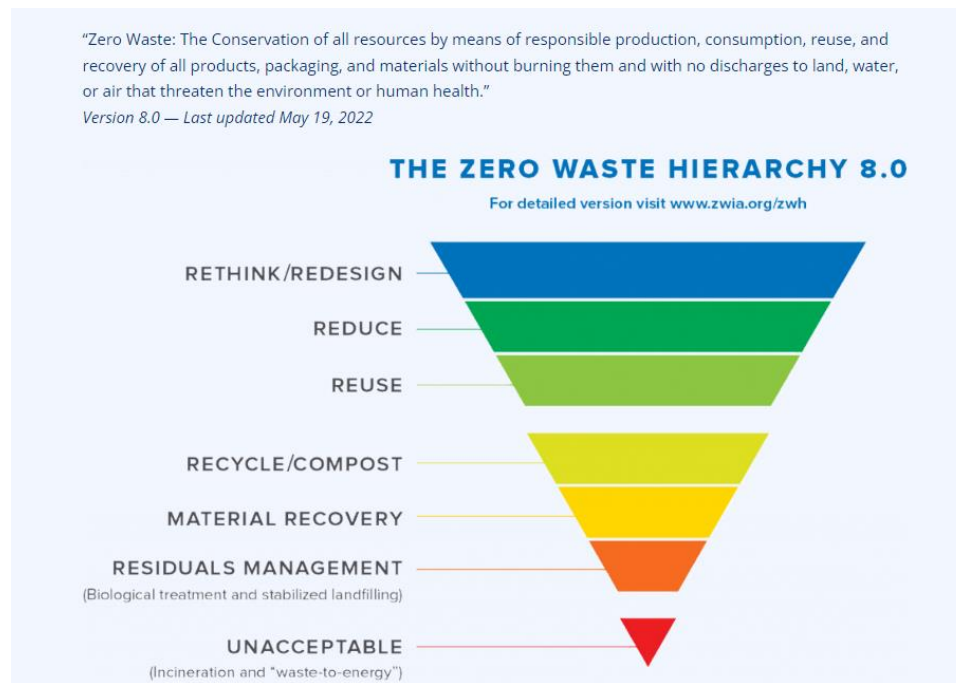
Plastics do not break down in the environment, forcing them to accumulate in air, waterways, agricultural soils, rivers, and oceans. Concern for the impact of plastics on ecosystems, food and water supplies, and human health have rapidly increased. Research now shows that microplastics and nanoplastics have penetrated every system and every environment including the Arctic, Antarctic and coral reefs. Macro plastic strangulation, plastic ingestion and microplastic leaching into waterways is having devastating impacts on animal life.

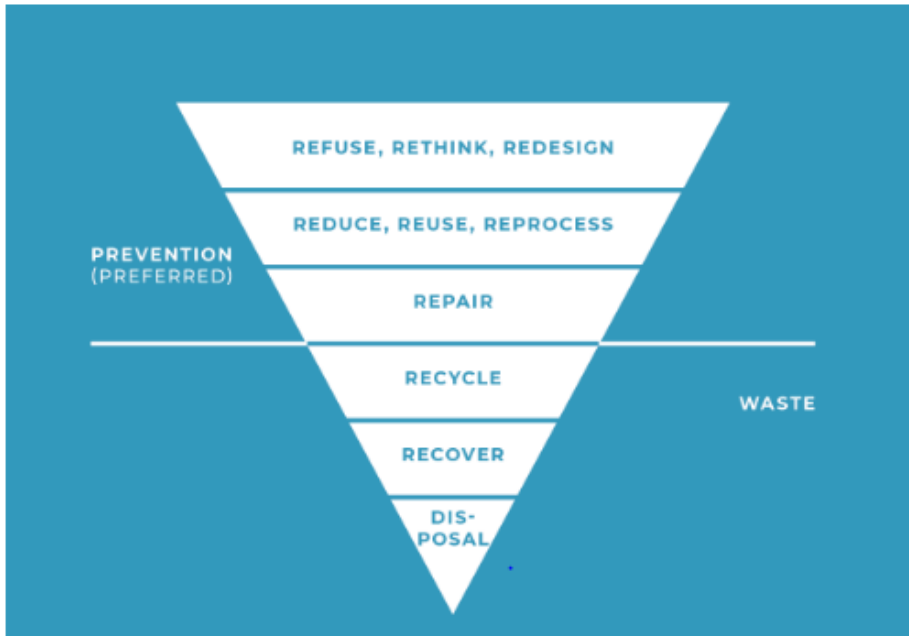


- Prevention-first approach

The discussion paper recommends following ‘The Pollution Prevention Hierarchy’. We recommend considering the Zero waste Hierarchy below for more comprehensive circular approach to waste management.

[Zero Waste Hierarchy of Highest and Best Use 8.0 - Zero Waste International Alliance \(zwia.org\)](https://www.zwia.org)





The waste hierarchy. P.11, *Measuring and reducing plastics in the healthcare sector* (2021)

[Towards plastic-free healthcare in Europe | Health Care Without Harm \(noharm-europe.org\)](https://www.noharm-europe.org/)

The addition of a ‘repair’ option in the ‘Healthcare Without Harm’ waste hierarchy above is beneficial and relevant to healthcare. The incoming ‘Right to Repair’ legislation in B.C. Bill C-244 ([C-244 \(44-1\) - LEGISinfo - Parliament of Canada](https://www.legisinfo.ca/parliament/canada/bills/244/)) will be hugely beneficial to the circularity of healthcare if implemented.

- Consistency and confidence:

From 2011-2013 a standardized recycling renewal project was launched across the lower mainland health authorities by the Energy and Environmental sustainability team (EES). Glass and soft plastic recycling were introduced then subsequently removed with changing recycling markets and a change in governance of the program from EES to the Business Initiatives and Support Services (BISS) -an organization responsible for provision of quality support services for care providers and patients across four health authorities; Vancouver Coastal Health (VCH), Fraser Health (FH), Providence Health Care (PHC) and Provincial Health Services Authority (PHSA). This governance structure subsequently changed again last year (2023) from a centralized management by BISS to being the responsibility of waste contract management teams at each of the four lower mainland health authorities (PH, PHC, PHSA & VCH) supported again by EES.

In Interior Health (IH), Island Health (VIHA) and Northern Health (NH) Authorities waste is managed by their Environmental Support Services Teams. The difference in governance between



the lower mainland sites (with support of EES – remote locations are outside of EES scope), remote locations of the Island, Northern and Interior Health Authorities have required different approaches to manage their unique challenges such as extreme weather events, geographical remit, wildlife and limited availability of certain waste streams.

The changing ownership and governance of recycling and the variation in the streams available has led to a lot of variation in bins, signage, education and understanding of waste management in healthcare in B.C. There have been reports of medical staff bringing soft plastics to local collection centers when the stream is not offered in their facilities as they feel so strongly about this.

In the B.C. health authorities (NH, IH, VIHA, VCH, PHSA, PHC, FH) an active effort is being made to standardize waste management through the development of a *Provincial Waste Technical Support Services Team* chaired by the waste management lead at Interior Health Cameron Lock.

Due to the challenges outlined above provincial support with availability of recycling and organic waste streams in the more remote regions and best practice guidance on governance – such as mandated waste reporting similar to that of energy and travel related emissions is required.

An onus on vendors and waste haulers to provide journeys of waste for their partners would also be hugely beneficial to promote confidence in the recycling programs in place and dispel the narrative of BC exporting our problem overseas.

- Accountability and transparency:

Currently there are waste reduction targets set by the health authorities.

For the lower mainland the current waste reduction targets are set by EES and benchmarked off of Practice GreenHealth North American best practice standards. NH, IH and VIHA all have their own environmental targets.

To enable standardization, an agreed upon target provincially reported to the Ministry would be beneficial with clear guidance on inclusion criteria. For example if waste intensity is chosen as a metric do we capture biomedical waste or do we use the core waste streams of organics, recycling and garbage to enable comparison with other ICI's or will healthcare have a unique target? Given the scale of waste in the industry it may require one.

## 2. What outcomes are most relevant to your business, organization, or community?

- Prevention First Approach
- Consistency and Confidence
- Accountability and Transparency



- Access
- Natural Environments and Human Health (recommended).

### 3. How would you prioritize these outcomes?

- Prevention First Approach – let's get the waste out of the system.
- Natural Environments and Human Health
- Consistency and Confidence
- Accountability and Transparency

### 4. Are there indicators or measures of success you would suggest are used to determine if an outcome is achieved or is achievable?

- Measure of success would include the number of switches from single-use plastic items to sustainable, clinically safe, reusable alternatives.
- Number of vendors offering 'closed loop' recycling solutions.
- Waste diversion rates.
- Weighting in product contracts for planetary health with a focus on packaging being recyclable in Canada.
- Full cost-benefit analysis of proposed solutions. The travel related emissions of driving waste to a port to be recycled overseas probably will be worse than managing that waste as 'garbage' locally. We need to ensure the solutions imposed are actually beneficial to the environment and not just optically 'greener'.

The scale of plastic usage in healthcare is immense and measuring the success of outcomes may be slow and challenging due to the significant changes required in purchasing, human behavior and waste management standard operating procedures (SOPs). Collaboration with Infection Prevention and Control (IPAC) teams, PHSA procurement (particularly their sustainability advisor), environmental services teams and waste contract managers. Healthcare is a complex industry with healthcare waste being even more complicated.

Number of vendors utilized who offer closed loop recycling services.

## **Section 2**

5. Should non-residential packaging targets be the same, or better than existing residential packaging targets? Why or why not?



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- Targets should be dependent on the specific sectors. The context of the non-residential sector varies significantly i.e. schools will have more control over their waste than healthcare will.

6. What types of targets would be most useful? Reduction targets; reuse targets; recycling targets; diversion targets?

- In healthcare we primarily look at intensity and diversion as our waste management metrics. These targets vary across the province. Diversion metrics/targets need to be carefully selected so as to incentivize desired outcomes. For example, if landfill diversion % is to be maximized, that may be counter to reduction efforts upstream, which will reduce overall landfill diversion %. We need to follow the waste hierarchy and reduce overall waste generation. Multiple metrics should be used to get a fuller picture of progress. An overall reduction target is priority which is standardised to each sector. It would not be comparable to have the same target for the whole non-residential sector.
- Also good to consider targets for different tiers of packaging. Secondary/tertiary packaging for health care is much easier to make a case for recycled content compared to primary packaging with sterility requirements.

7. Should there be regional or business specific targets in addition to provincial targets? Why or why not?

- It should be both.
- Different sectors/regions/businesses will be able to achieve different targets. Northern Health does not have the same infrastructure as Vancouver Coastal, for example.

8. How can we measure success or progress against established targets?

- Pick a baseline year, utilise the metrics that make the most sense in capturing the activity and changes which occur in healthcare i.e. Patient bed days, FTEs, radiology exams etc. Utilise international best standards and benchmarks to devise targets.  
Capture data on the metrics i.e. weight of waste diverted, weight of waste to landfill etc.

### **Section 3**

9. What actions are best suited at the local, regional, or provincial level of government?

The health authorities collaborate in B.C through a provincial Waste Management Tech Team chaired by the Waste Management Lead for Interior Health Cameron Lock.

We are trying to standardise our waste management practices (as much as is possible) across the province of B.C. For us, waste management at provincial level of government makes the most sense as a sector as we work on collaboration and standardisation.





We recognise and respect the unique challenges that climate and geography can present across the province. A regional lens may be required for emergency responses for waste management during extreme weather events where haulers may not be able to access sites due to wildfires, heavy snowfall, avalanches, flooding, stormy seas etc.

Depending on the remoteness of regions a local level of government may be better suited to weigh up the best options out of service availability. For example if a remote area has no recycling facilities in the jurisdiction but has a local waste to energy plant, weighing up the environmental impact of driving that waste across the province to potentially ship overseas compared to utilising the local waste to energy plant to manage the waste. A cost benefit analysis would be beneficial.

10. What factors should be taken into consideration if the Province enables or promotes local actions?

Healthcare can often receive blanket exemptions to local, regional or provincial plastic management directives due to the nature of the work with patients and with infection prevention and control standards.

We appreciate there are exemptions required for certain disciplines in healthcare however, blanket bans for such a large wasteful sector should not be made. We need to embed sustainability into the sector and any local, regional or provincial level exemptions need to be evidence based.

Local actions should be utilized where there are unique criteria which make provincial recommendations unsuitable. There should be governance of these actions feeding into regional/provincial plastic management goals.

Local actions need to be equitable with the more remote regions being supported with service availability similar to the more urban centers (as much as is available). Where services do not exist for these regions in the current market, provincial incentives and mentorship from the Ministry to support waste management in these areas should occur.

If local action is supported there should be a reporting forum to capture the good work happening and scale to other municipalities. We do not need to be reinventing the wheel but sharing our successes and learning from one another.

Local knowledge should be explored especially indigenous knowledge of the land, sea ice and air. Transparency at each level is very important.

**Section 4**

11. What is already working to prevent packaging waste – for businesses, institutions, haulers, local governments?

- Working directly with suppliers on packaging reduction opportunities.



- Bulk buying.
- Identification of items which can be included in customised packs i.e. wound dressing packs rather than items being sourced, transferred, packaged with each producing waste.
- Inclusion of planetary health considerations related to packaging in the RfP questions for new contracts. Provides weighting and an expectation for this to be a focus.
- Supporting switches from single-use to reusable items.

12. Are there other actions that should be considered? What are they?

- Comprehensive list. Potentially an incentive for reusables or penalties for unnecessary excessive packaging for vendors. Ideally a grant to incentivise approach such as a tax break, additional scoring in RfPs for vendors who comply. In healthcare we are incorporating planetary health questions and weighting into our RfP process. Marianne Dawson in PHSA procurement is spearheading this impactful work.

13. What are the benefits or limitations of these waste prevention options?

- Incentives are a better approach for buy in than penalties. Want sustainability to be the positive choice and to not arouse negative emotions or push back. We also do not want to marginalise or punish startups or smaller businesses who may not be able to invest in changing packaging for example.

14. How ready are organizations, businesses, governments to implement?

- I imagine each sector is at a different starting point. Even within sectors there will be variation. Each health authority is at a different stage of their sustainability journey with some incorporating planetary health teams into their organisations which can leverage senior leadership support and funding.
- There are a lot of moving pieces to consider for this engagement inclusive of international recycling markets, political landscapes provincially, nationally and internationally. Provincial permits and vendor service availability for more geographically remote areas. Changing climates and climate adaptation and mitigation also need to be considered in terms of logistics and timelines to remove plastic waste and reduce oil extraction in Canada (economic and social considerations of this).

15. How should implementation be prioritized?

- A good communications campaign as to why a change is needed.
- Focus on the priorities sectors highlighted in engagement workshops.



Providence  
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- Begin with the low hanging fruit where a win and success are visible, celebrate the wins.
- Prioritise projects less reliant on human behaviour and more on a process change as this is easier to control and implement.

## **Section 5**

6. What are the benefits or limitations of expanded EPR options?

Benefits:

- Research and development funding from these generally large multinational corporations towards more sustainable solutions.
- Funding towards Life Cycle Assessments (LCAs) for medical products which are often timely and expensive. (Caution re internal bias from the company with these).
- Having producers responsible for recycling materials where we currently do not have options (e.g. PVC, or in rural areas there aren't many recycling streams due to market unavailability).

Limitation:

- Requirement for additional bins to store waste for return to vendor. Need for storage for these bins, space in loading dock, vendor pick-ups or logistics of transporting waste back to the vendor. Travel related emissions from rural areas.

17. How ready are organizations, businesses, and governments to implement an expanded form of EPR?

- The Sustainability Advisor in PHSA Supply chain is incorporating EPR into the planetary health questions which are currently being embedded into our RfP processes within the health authorities. The health authorities all have planetary health and sustainability strategies or goals they are working towards. There is an appetite for our producers to do more.

18. Are there sectors or materials that should be prioritized to be included or excluded? |

- Hospitals and hospitality utilise huge volumes of single-use plastics and we would be high impact sectors to begin with.
- Institutional sectors like hospitals would benefit from a reusable food service container mandate. Almost always this food is consumed on campus and hence containers do not leave the premises. This can facilitate on-site collection/cleaning and reuse. Support or guidance for necessary infrastructure to support this would benefit the Food Services teams.
- Working with the procurement teams of these sectors to identify the high-volume items would create a starting point of high impact items to address which could be realistically replaced with a reusable alternative or have the potential for reduced plastic waste. PHSA sustainability advisor



Marianne Dawson and Leader in Sustainable Clinical Services Colin Chan at VCH spearheaded the 'Reusables First' project presented at the N.American CleanMed conference earlier this year.

19. How should implementation of EPR actions be prioritized (e.g. by sector, by material, by geographic location)

- By material be the most standardised approach however this would need sectorial context & consideration.

Thank you for your consideration of our response.

Signed:



**Robert Bradley**

Regional Director, Energy & Environmental Sustainability

Facilities Management

[Fraser Health](#) | [Providence Health Care](#) | [Provincial Health Services Authority](#) | [Vancouver Coastal Health](#)



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July 23, 2024

To: [CircularCommunities@gov.bc.ca](mailto:CircularCommunities@gov.bc.ca)

Re: Preventing Waste In British Columbia

The Biodegradable Products Institute (BPI) is North America's leading certifier of compostable materials, products, and packaging, with over 500 member companies worldwide, including many in Canada and specifically British Columbia. As a science-driven organization, BPI supports a shift to the circular economy by promoting the production, use, and appropriate end of life for materials and products that are designed to fully biodegrade in specific biologically active environments. Our certification program has verified thousands of items using ASTM standards as a baseline, plus additional requirements on PFAS, labeling, and eligibility criteria, all to help to keep organic waste out of landfills.

We appreciate CleanBC's effort to promote discussion with its [paper](#) focused on non-residential packaging and paper products, however we'd note that the desired outcomes fail to include certified compostable products as an important way to maximize material recovery. As the report states, the urgency for ensuring organics are diverted from landfill is critical; food and green waste create methane that contributes to climate change and takes up nearly half of BC's limited landfill capacity. Across the globe, we have seen certified compostable products help facilitate the diversion of food waste, in particular food scraps, from landfill, used in applications associated with food and food waste, and are therefore often not suitable for recycling.

Given the non-residential scope of this paper, we feel compelled to note that collecting and processing organics from ICI sector is one of the most important for increasing organics diversion. While post-consumer residential organics programs can be challenging due to the diversity of waste generators, lack of harmonized education, and varied levels of contamination, ICI streams typically generate large volumes of organic waste in a single location, allowing a composter to more easily identify any sources of contamination. Furthermore, the large and predictable volumes of organics support the economic development of compost facilities. Finally, ICI streams are often part of a closed loop system, meaning that the physical inputs such as compostable food service ware and packaging are controlled by a single entity, making handling and training consistent for personnel.

In response to some of the specific questions asked by the discussion paper: **1. Are there any desired outcomes missing from this list?**

Yes, maximizing material recovery should include maximizing the diversion of food scraps and other organic waste to composting, using certified compostable products as effective tools to facilitate collection and reduce contamination from non-compostables. Several U.S. states require ([example](#)) organics diversion for venues of a certain size, often employing certified compostable products to achieve best results.

## **6. What types of targets would be most useful? Reduction targets; reuse targets; recycling targets; diversion targets?**

We support the Canada Plastics Pact targets for 100% of plastic packaging to be designed to be reusable, recyclable, or compostable, for 50% of plastic packaging is effectively recycled or composted, and for 30% recycled content across all plastic packaging, \*exempting compostable plastic products\* as they aren't designed to be recycled.

## **11. What is already working to prevent packaging waste – for businesses, institutions, haulers, local governments?**

Geographies across the world have prevented packaging waste by strategically supporting the use of certified compostable products in instances where, in addition to diverting food and organic waste, those products are otherwise not reusable or recyclable.

The city of Seattle, Washington, for example, requires certain to-go food ware items in restaurants and other venues to be certified compostable, reducing contamination for the facility servicing those areas. Similarly, both the [state of California](#) and the [city of Milan, Italy](#) require 'pre-checkout' grocery bags in produce and bulk sections to be made from paper or certified compostable film plastic so customers can collect their apples and compost their apple cores using the same bag. The European Union may require single serve coffee and tea products to be certified compostable, as the pods and bags aren't recyclable and the spent grounds and leaves can be composted. Finally, ECCC Canada has proposed in draft for a requirement that would make conventional plastic PLU produce stickers compostable by a future date.

In addition to supporting these specific and beneficial use cases, the passage of on-product labeling laws, including in BC's southern neighbor Washington state, have created requirement to ensure than compostable products are certified by and independent third party to disintegrate and biodegrade in compost facilities, and to be free of PFAS and other toxic chemicals, meanwhile prohibiting misleading and unsubstantiated terms like 'biodegradable' that cause consumer confusion and lead to contamination. ECCC Canada is considering [similar requirements](#).

## **13. What are the benefits or limitations of these waste prevention options?**

Product bans, like those in the province's [Single-Use and Plastic Waste Prevention Regulation](#) inflict unintended consequences. In this case, the regulation excludes certified compostable plastic products that have been tested for toxic chemicals including PFAS and can support the diversion of organic waste. Their replacements, if paper, are not required to be certified compostable and therefore may be introducing PFAS chemicals to consumers and/or finished compost.

#### **14. How ready are organizations, businesses, governments to implement?**

We find that organics diversion programs in the ICI sector are relatively easily implemented once key stakeholders are identified. Basic education programs must be created and implemented, however industrial and commercial audiences tend to change less over time compared to residential programs, allowing for clear feedback and sophistication over time.

#### **16. What are the benefits or limitations of expanded EPR options?**

Expanding EPR for organics in the ICI sector is critical to facilitate the diversion of organics from landfill. A recent [regulatory impact analysis](#) has estimated landfills generate 19% of methane in Canada. Many of these emissions can be avoided by using fees paid by the producers of certified compostable covered products in EPR programs to support the collection and processing of organic waste.

#### **18. Are there sectors or materials that should be prioritized to be included or excluded?**

Well-designed EPR programs that thoughtfully integrate compostable products can help provide composters with the funding they need to accept and process covered materials and their complex accompanying food feedstocks. Additionally, funding from EPR can support education for consumers and the affected waste generators to ensure maximum diversion with minimum contamination.

Most EPR programs in Canada have failed to include funding for or representation from the compost industry, despite compostable product-makers paying into the system. However, more recent laws in Colorado, Minnesota, and California as well as international programs such as in Italy have dedicated support to build systems accepting and processing compostable products. It is most equitable for certified compostable products to pay into an EPR program whose funds support their desired end of life, which is composting. Through EPR, providing composters with tools and capabilities to build compost facilities for the future is an urgent need, and we respectfully ask that you please include certified compostable products and the composting value chain in your program, just as you've included recyclable products and recycling.



Please reach out to us with any questions.

Sincerely,

Alexander Truelove

Biodegradable Products Institute

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