



December 21, 2022

Recycle BC Program Plan Feedback

To Whom It May Concern:

Thank you for the opportunity to comment on the draft plan. Zero Waste BC is a non-profit association dedicated to driving systemic change towards Zero Waste in BC. Zero Waste Canada is a non-profit grassroots organization and the Canadian national affiliate for the Zero Waste International Alliance dedicated to ending our age of wastefulness through improved industrial design, certification, and education. 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 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. EPR programs can play a key role in changing these consumption systems. For more information on Zero Waste, please see the Zero Waste Hierarchy.¹

We are pleased that Recycle BC will be submitting its plan which includes some improvements to its existing system but hope for many more. We submit these comments in hope that the program will show leadership in the realm of EPR to move it beyond mere recycling to actually changing the nature of the products and how the service is delivered, as envisioned in the Canadian Council of Ministers of Environment Canada-wide Action Plan for EPR. We also hope the program will aim to address the gaps noted in the Canadian Council of Academies circular economy study commissioned by Environment and Climate Change Canada.² Furthermore, Recycle BC is encouraged to raise the bar in educating society on the overarching outcomes it wishes to achieve in the next five years towards sustainability and measuring this against the United Nations Sustainable Development Goals (SDGs). This should become a new standard for EPR in measuring across the triple bottom line of social, environment and economic outcomes that advances the circular economy. The 17 SDGs aim for a healthy social fabric and new economic business models while protecting biodiversity, the environment and the climate.

Please see our comments by section below:

¹ Zero Waste Hierarchy: <https://zerowastecanada.ca/zero-waste-hierarchy/>.

² Canadian Council of Academies, (2021), Turning Point. <https://cca-reports.ca/reports/the-circular-economy-in-canada/>

Section 1. Context

We appreciate the Recycle BC program for providing collection and recycling services for residential packaging and paper products in a way that has weathered the change in global recycling patterns and offers some transparency into where the materials go. We hope that Recycle BC will go beyond furthering its producer members' plastic recycling objectives to actively working to decrease plastic flows starting with the hard to recycle, single use and low market value plastics.

Section 2. EPR agency

2.2 Administration

We appreciate that Recycle BC has an Advisory Committee and hope that there can be more transparency for this committee by including minutes, recommendations from the committee and how the Board has addressed them on the website. In addition to this, the Board would ideally represent a wider range of stakeholders including reuse and refill organizations, recyclers, other local governments, First Nations and environmental NGOs.

2.3 Producer Members and Definition

There is a definition of "small producer" in the Recycling Regulation that exempts producers with gross revenue of under \$1,000,000 but the packaging from these producers still flows into the waste and recycling system and the exemption allows small producers to use packaging without penalty and at a cost to the other producers. Recycle BC should work with the Ministry to lower the exemption amount step-wise over time to capture more producers, collect better data and even the playing field.

2.4 Program Financing

In addition to the factors noted, the program should also be funding education and incentives for the producers to offer refill and reuse systems and to decrease their packaging. Fees should reflect management costs but also be calculated to reflect environmental costs to drive a decrease in plastic packaging (particularly foam packaging and multi-material flexible packaging) and the use of more local, circular systems. Sufficient fees should be collected to pay the actual costs borne by collection partners and to build a reserve fund to prepare for the expected increase in severe weather and other events.

The program **needs to prove** that all collection sites are being adequately compensated for their services and in particular, that local and First Nation governments do not end up subsidizing the program (including for education services).

Transparency

The program should aim for full transparency, including information on these items:

- what percentage of producers are members
- how the materials were managed according to the hierarchy (and clarify the definitions being used)
- where the materials go
- of what organizations and lobby groups it is a member
- explain the relationship and role of the Canadian Stewardship Services Alliance (CSSA)
- producer fees - how they are calculated based on material type, including how the fees are encouraging design change
- how Board members are selected and if they are paid.

Third party verification of data should be provided wherever possible and not just for the elements required by the Ministry.

Environmental, Social and Governance (ESG) elements

Corporate ESG is now emerging. Publicly traded corporations will be required to report on environmental, social and governance policies and metrics. A new reporting regime of ESG needs to be incorporated into EPR plans voluntarily while the Ministry should make plans to update the Recycling Regulation and Guidance to accommodate ESG reporting. It is important to note that this will not be new to Recycle BC Board members and some are well positioned to support this type of reporting as it would add value to other corporate members, government, indigenous communities, academia.

Federal Plastics Registry

We encourage Recycle BC to collaborate with the upcoming Federal Plastics Registry to provide suitable data as well as to seek further benefits such as developing a better understanding of the full amount of packaging going into the market.

Governance

The following elements should be incorporated to improve the governance to the highest standards:

- A good balanced governance structure should be designed from an ESG perspective and the members participating should not be spectators but decision-makers and influencers in shaping a sustainable supply chain of materials into a circular economy with a goal to create cleaner sustainable packaging. Board members should be able to influence upstream design of packaging and to address problematic packaging.
- Increase transparency in selecting board members. Election of board members should occur at the Annual General Meeting.
- Members of Recycle BC should be invited to hear the results of its performance annually.
- There should be a sub-committee to deal with problematic plastics with low recovery rates. This is an opportunity to show continuous improvement and commitment to take on challenges to plastics.
- Another sub-committee should address free-riders.

- Board members should demonstrate their understanding of good corporate governance and have taken some basic training (accredited or non-accredited.) and this should be disclosed in the annual report. As the board has a fiduciary responsibility and executes the financial operations, having trained board members becomes critical and ethically sound.

Section 3. Packaging and Paper Product

We are pleased that the program covers all products defined in the *Recycling Regulation* but hope for completeness that the program would work with the Ministry to include books. The inclusion of the single use products and packaging-like products is a significant step forward.

The program should work with the Ministry to reconsider the exemption for time share and condominium residences that may be both part time residence and a vacation facility. Within one building, there may be owners who use their unit exclusively themselves and others who choose to rent them out. There is no difference in the types of packaging used in these units and it is no different to the numerous single family homes that are rented out as short-term rentals but that do receive service. Student housing, senior housing and all forms of housing should also be included. In addition, the program needs to address the fact that businesses purchasing items from producer members will have had a fee included in the price of the product but will not have access to the program.

Section 4. Program Design

4.1 Principles

The program should add a principle that the program will strive to meet the intent of the Canadian Council of Ministers of Environment Canada-wide Action Plan for EPR.

4.2 Program Delivery Overview

The program should offer full compensation for costs incurred to provide the services rather than just an incentive.

In smaller communities where the division of recycling services into residential (Recycle BC) and ICI (local government or private sector) has created a problem in marketing the remaining materials, Recycle BC should offer a service (for a fee) to transport, process and market the materials that end up at local government (or local government-approved) facilities. This would alleviate the challenges that local governments have experienced handling the smaller volume of materials and reduce redundancy of systems and services.

In regards to financing, Recycle BC should further develop variable environmental handling fees based on certain criteria such as lifespan, use of refillables and reusable containers, use of easy to recycle materials (versus materials that are wasted by being burned for energy), etc. to drive product design change as intended by the Canadian Council of Ministers of Environment. The

program could incentivize reusable containers and then those that are actually recyclable. try to prevent biodegradable forms of packaging from being used with prohibitive fees.

The fees should also be set at a higher level to pay for the improvements needed in understanding collection rates, providing more comprehensive collection networks, enhancing awareness and fulfilling the mandate for redesign and reuse.

4.3 Collection

4.3.2 Accepted Materials

The program is correct to charge fees for materials that are put into the marketplace but not collected. However, these fees should then go to local governments who end up with the responsibility of handling them. Fees for unaccepted materials should be high enough to drive design change. By doing this, the producers are incentivized to change design, local governments are compensated for their services and the program does not benefit from not collecting the materials (thus avoiding a perverse incentive).

The activities that Recycle BC will pursue (estimating percentage of not accepted materials, and composition audits) are good steps and the results should be made public. The other steps that look to try to recycle the non-recyclable, however, will only waste time and resources.

Following the principle to focus on outcomes and minimize complexity, the most suitable steps are to work to phase out the non-recyclables through producer engagement, education, eco-modulated fees and collaborations to ban problematic packaging. Facilitating claims that a material is recyclable when it is not truly recyclable such as allowing it as a contaminant in a plastic stream or hiding it in concrete will only exacerbate the public mistrust issue noted in the context (section 1).

Compostable PPP

We fully support compensation of local governments for their processing of the fibre-based elements but want to ensure that Recycle BC does not support the collection of any compostable plastics, nor fibre that has been treated in any way (such as coated with PFAS or any other potential contaminants). Recycle BC should develop stringent requirements to eliminate the use of PFAS (and other harmful chemicals) in packaging and printed paper. In addition, Recycle BC should ensure that the materials sent to a composting facility are able to break down under the actual operating conditions of the facility and that the facility wishes to accept them. If not, Recycle BC should consider developing its own collection and processing system.

4.3.3 Curbside Collection

Recycle BC has been doing well to expand its curbside collection offerings. It has been also working with First Nation communities to improve its collection infrastructure. However, the

criteria set out in Appendix B for which communities qualify for service do not meet the intention of the Recycling Regulation (which does not have these limits). Recycle BC services very small to very large communities so it has proven that the system can work in small communities. In addition, residents in small communities contribute to the producers coffers when they buy products and deserve equal access to the service. The services should be offered to any municipality, First Nation community or rural community that has or is planning to implement curbside garbage collection, regardless of size, density, if there is a grocery store or if the previous contract holder declined to renew. Once a community has signed up for the service, it should be delivered within a calendar year or to coincide with the rollout of curbside garbage service if that is being added. Recycle BC should pay for the bins. Only allow multistream collection for new services and increases.

4.3.4 Multifamily Collection

The incentive should be reframed as full compensation for the provision of services and the full costs paid. Transparency is needed to show the percentage of multifamily buildings in BC that receive services with a target to get to 100% of buildings that wish the service being serviced within 5 years. Communications should be direct to the building owner or strata as it is not clear if most are even aware of the obligation Recycle BC has to provide their services and that the Regulation would dictate that Recycle BC pay their full costs of recycling. The system and oversight of the collection from multifamily buildings needs significant strengthening. A building owner or strata should be able to opt in and then Recycle BC should be responsible for providing the service (regardless of if curbside service is offered in the community or not, or by their hauler). All areas of BC should be serviced by Recycle BC with a particular focus to quickly expand service in smaller communities where existing options for multi-family recycling do not exist.

4.3.5 Integrated Recycle BC Collection Services

Now that West Vancouver has piloted separate collection of foam and plastic and several communities have separate glass collection, Recycle BC should work to collect film plastics and glass separately through curbside (and also for multifamily) in all communities that choose to do so at Recycle BC's cost. Recycle BC should work to phase out the use of foam but as this transition takes place, it should also offer curbside and multifamily collection.

Similar to where curbside services should be provided where there is curbside garbage collection, depot service should be provided for communities where there is a staffed garbage drop off option, if they choose to participate and also provide service through all willing retailers. All costs for this service including the proportion for use of space, equipment and staff time should be covered by Recycle BC.

Recycle BC needs to increase service, not decrease it. It is inappropriate to suggest communities that currently have service could lose it should the current provider decide to no longer provide the service. We fully support the ability for local governments to operate satellite depots and

recommend that Recycle BC cover their fair share of the costs, and include the greenhouse gas calculations in the Recycle BC total.

4.3.6 First Nations Collection

We appreciate the work that Recycle BC has done to enhance the recycling options available in First Nation communities, for Recycle BC materials and also for other EPR program products through the First Nations Recycling Initiative. Recycle BC is also to be commended for its collaboration with the Indigenous Zero Waste Technical Advisory Group. We feel that Recycle BC can build on this work through, not just providing financial offers to those communities that have the recycling capacity, helping communities build that capacity, fully funding Recycle BC's portion of the costs and working to eliminate wait times to access service. The comments regarding accessibility noted in the above sections also apply to First Nation communities - where there is a service for garbage drop off or collection and the community wishes recycling services for PPP, Recycle BC should provide them at its cost and in a timely manner. Where collection services are provided jointly to both a municipality and a First Nation, additional resources should be provided to ensure a high standard of service can be maintained given the different systems that may be required.

It is also important that collection of materials from the depots is in a timely and frequent fashion to ensure that storage of the materials does not burden the community and impact its ability to collect these or other EPR materials.

The support for community clean ups is fantastic and should be offered to other communities as well given that packaging is usually a key component of the litter.

4.3.7 Streetscape Collection

Streetscape collection addresses the need created when producers provide disposable items. Best practices are to ensure a reduction in disposable items (such as single use items) and provide and service clusters of bins that have all the options in one place and are wildlife-resistant in all but the most urban of locations.

The following recommendations will enhance the streetscape program:

- All local and First Nation governments should have access to a fully funded, Recycle BC streetscape program where they provide garbage bins, regardless of size or density of community
- Recycle BC should pay the full cost of bins for recycling for all communities with streetscape garbage
- Recycle BC should pay for and add option to pour liquids into (like Encorp's city plaza bins)
- Recycle BC should mandate organics collection bins to be paired with the Recycle BC bin and a waste option
- Set goal to decrease single use beverage cups and incentivize reuse programs. Offer collection services for reuse programs.

- Recycle BC should pay the cost for its products that remain in the waste to provide an incentive to producers to redesign the system, packaging and products that results in streetscape waste
- Note that the culture around sorting streetscape waste into recyclables, liquids, organics and garbage will take time but can be accelerated through work that Recycle BC can do across the product lifecycle (from product redesign and retailer engagement to generator education)
- If/when compostable PPP materials are collected and processed by local governments, Recycle BC should pay for its share of the services. It should not be up to local governments to market these materials nor process it themselves provided the quality can be provided

4.3.8 Financial Incentive Methodology

Recycle BC should pay for **all** of the costs that are required to provide the service and to keep the payment levels up to the increase in costs for **all** of the communities that wish service (including provision of bins). We agree that there should be a premium paid for multi-stream collection over single stream and penalties for contamination. The cost studies show that Recycle BC is paying below even the average costs to provide the services, let alone covering the higher costs that some communities may experience. This means that communities continue to subsidize the program or may not have suitable services. This needs to be rectified.

In 2022, it appeared that producers were paid to produce HDPE bottles or use aluminum packaging.³ While we wish to incent easier to recycle materials over hard to recycle packaging, all recycling of packaging should carry a cost to drive reduction. The program should instead consider paying to incentivize reduction and reuse systems. This may highlight a problem with how fees are calculated where a sudden increase in commodity prices can skew fees and shows the need to revise how fees are calculated.

Compliance (Free-Riders)

Recycle BC's plan should have a section on free-riders and Recycle BC should outline the actions it is taking to address free-riding companies (those avoiding their legal responsibility to comply and pay into the program). Addressing this issue is key to ensuring fairness, a level-playing field, fair distribution of costs, full transparency and achieving the redesign goals of EPR. Recycle BC should ask the Ministry to embark on a compliance promotion initiative targeting key sub-sectors of the economy where packaging is used in order to achieve compliance outcomes.

³ Recycle BC Fee Schedule 2022. https://recyclebc.ca/wp-content/uploads/2021/11/Recycle-BC_Fee-Schedule_2022.png

Overall

Collection of PPP needs to be a service that is offered in conjunction with option to dispose of garbage and it is Recycle BC's responsibility to provide this -at home, in apartments, for communities including First Nation communities, and at streetscape. This service needs to be permanently or frequently available. Mobile depots should be used to raise awareness of what can be collected but not as an alternative to a staffed permanent depot or collection from homes as it is unreasonable to require citizens to store packaging at home waiting for an intermittent and infrequent option to occur and this is likely to increase materials going into the garbage. Local governments need to be allowed to switch to direct service with Recycle BC easily (particularly given the costs are not fully compensated), but local governments should be able to provide some direction on operational aspects to increase diversion, ensure harmonized schedules and maintain the connection to residents. Service needs to be provided by Recycle BC to match garbage services, even if the community does not have a grocery store or if there is not a local organization that will provide the service. This program handles the most ubiquitous and frequently discarded type of products/packaging so the accessibility of services should be the highest of any EPR program.

Landfill Audits and Uncollected Materials

The use of waste composition audits is useful to see what PPP remains uncollected by the program, and the program should partner with other programs to conduct composition studies annually across BC. The results should be published on the Recycle BC website, and the details of the studies should be included in the annual report to the BC Government and made public. This data should be used to understand the degree of success of collection given the data missing on materials from small producers. Any local government or First Nation's government who requests assistance in funding a waste audit that includes residential PPP should receive appropriate funds and not need to go through the SABC request system. The goal should be to increase the data available to show program performance.

In addition, the program should pay local governments for materials that end up in local government facilities to both compensate them for the services rendered (and often the filling up of remaining landfill space with inappropriate materials) and to further incentivize design change by producers.

Finally, data should be gathered on mismanaged and littered material. Data from groups like the Ocean Wise Shoreline Clean Up and other clean up efforts (like Pitch In Day) can help to identify how much packaging is ending up in the environment. Producers should pay their fair share of the costs to clean this up, similar to what is being proposed in Germany.⁴

4.4 Post Collection

The focus on investments in mechanical recycling infrastructure, efficiency, transparency and local end markets are appreciated but care should be taken that the work to minimize

⁴ Euro News. <https://www.euronews.com/green/2022/11/03/germanys-new-plastics-bill-could-see-businesses-contribute-450-million-per-year-to-litter->

redundancy does not make it challenging for Recycle BC to secure future contracts or impact the resiliency of the network. The focus on technology should not come at the expense of innovation in the systems that result in the materials being discarded in the first place.

An additional key outcome should be to include environmental outcome by using the material at the highest level of the waste hierarchy as possible to move towards reduction (both volumes and toxicity of materials), reuse, avoiding downcycling, minimizing disposal to landfill and eliminating the use of materials as fuel (whether burned on a site or sent as fuel to be burned elsewhere). The Zero Waste Hierarchy should be used to develop systems for the PPP to be redesigned, reduced, reused and recycled. Investments in or use of “chemical recycling” or “chemical processing of plastics to fuel” should be avoided in favour of steps further up the hierarchy. We appreciate Recycle BC’s diligence in overseeing end market destinations and processors, with a preference for OECD countries and processors that meet standards. This is essential to operating a quality program and building trust in the BC system.

4.5 Dispute Resolution

The concern with the dispute resolution process is the inherent imbalance of power between Recycle BC and what could be a fairly small collector or even a small local or First Nation government. Current contracts are take-it or leave-it for rates that Recycle BC acknowledges will not even pay for the average of costs incurred. With the advent of the program, there is even less ability for a community, collector or processor to go it alone and market the small amount of materials an individual community may collect. Meanwhile, Recycle BC has been failing to meet its mandate to provide service to all of BC and paying 100% of the costs. In this context, recognizing these imbalances, there needs to be far greater options available to collectors, processors, and most importantly communities (including First Nation communities) to access a fair dispute resolution process (possibly including coverage of all costs of mediation or arbitration).

4.6 Communications

The communications program should not only work to increase awareness and make correct decisions on collection and recycling through its existing strategies, but also aim to change behaviour and offer options to reduce the amount of PPP used in the first place.

Recycle BC should determine if it is most effective to try to raise collection rates of poorly performing materials (i.e. low collection rates, low awareness levels, low marketability of materials such as flexible plastics, foam and film plastics) or if it is better to try to phase their uses out through strong program incentives to switch to reusables or other materials that have a strong and established recycling market.

Over time, for materials that can be recycled and for which Recycle BC can collect, it should work with producers to ensure the recycling labels in packaging are accurate with regard to recycling claims.

The program may also wish to do user surveys to understand where and why materials may be uncollected, including looking at awareness, accessibility, convenience and other barriers that may exist to collection. A target to raise awareness as well as an annual survey to measure it would be useful to better understand barriers that the program should address.

A survey of the collection network should be done to understand what areas could be improved from both a collector and customer perspective. This network is an asset and using the collective knowledge would be advantageous. Metrics on customer satisfaction and collector satisfaction should be added to the program with targets suitably high for such an established program. A secret shopper (or dropper) program should be implemented to understand the consumer experience and if the collection sites are welcoming of products and providing correct information. Work should also be done to improve and enhance depot-based communications (signage, ease of finding location on the internet, accuracy of information provided, etc.).

The goal should be to get 95% of the population aware of the program by 2024 (and later 100%) with work done to increase awareness of the new range of products. To do otherwise is to continue to externalize costs to the public and the environment. The program could also pursue disposal bans with local governments as a way to ensure consumers do the right thing but also that they are aware that throwing these products away is not appropriate. More research should be done on the portion of product that is not collected to understand who is not participating in the program and what marketing and behaviour change initiatives are needed.

Recycle BC should consider the need to provide information in multiple languages based on the make-up of the communities in BC. Programs may also need to connect with different audiences if there are different kinds of products used by different markets. Consider the demographics of BC with regard to languages and ensure the materials are produced in the suite of languages needed to reach multiple demographics.

Section 5 Program Performance

5.1 Managing Environmental Impacts

We appreciate that the program is seeking to innovate and encourage reduction, reuse as well as recycling but the plan should spell out what new steps the program will take to achieve this such as noted above and engaging directly with producers to do so.

We appreciate the work done by the Canadian Plastics Pact but this program is responsible for more than the members of the CPP and more materials than just plastic (though this is the most problematic material). Most of the focus of CPP to date has been on recycling and how to include hard to recycle materials and is only recently looking at phasing out poor material choices and reuse. The Golden Design Rules look at using slightly less plastic in packaging and increasing the value of the some materials (including flexible packaging) but offer no guidance

on how to eliminate unnecessary packaging and foster reuse and refill instead. The program should be taking direct actions with the producers on these elements.

5.2 Pollution Prevention Hierarchy

As noted above, we encourage the program to use the Zero Waste Hierarchy and to go beyond hoping that producers are taking their own initiatives to actually drive, inspire and fund initiatives by producers. In particular, we would like to see a set of commitments and actions for how the program is going to drive rethinking PPP (such as eliminating plastic wrap on magazines and newspapers), eliminating harmful and hard to recycle forms, reducing environmental impacts, reducing toxicity of PPP (including inks and additives), and fostering reusables and refillables (for single use items associated with food or bags but also for delivery packaging).

The European Union recently announced targets for corporations to develop the reuse economy. Recycle BC members should be incentivized through its fee structure to move to reuse of packaging. Reuse potential is significant to slow down packaging consumption and allow for migration upwards in the pollution prevention hierarchy.

Note that although the products in the packaging are not part of the program, packaging and those products are closely linked and packaging can drive wasted food in particular (examples such as cucumbers packaged in a set of five -each individually wrapped in plastic and then in a plastic overbag which will inevitably result in wasted cucumbers as most families will only use one or two). Recycle BC should look to integrate the learnings from the recent WRAP report regarding produce, best before dates and consumer education on refrigeration.⁵ The program should work with producers to stop encasing food in plastic as much as possible and to ensure that consumers have choice of quantity of items purchased.

Use of material as engineered fuel is burning the material, not material recovery. Material recovery would be if Recycle BC screened mixed garbage to recover metal. Rather than investing in research to recover non-recyclable material, we would urge Recycle BC to use those funds to phase out those materials. We applaud Recycle BC for its continued stance not to use waste-to-energy facilities but encourage it to expand those exclusions to include all facilities that burn waste (such as cement kilns, use of engineered fuel or any other) to minimize environmental harms and build public trust. We also encourage Recycle BC to avoid including hard to recycle packaging in other products (such as adding plastic to concrete) where it results in a mixing of material types and makes the finished product hard to recycle and makes it very hard for a future owner of the material to know what materials are included in it.

Plastic

Plastic has numerous problems: it is from a non-renewable fossil fuel source, it breaks down into microplastics that do not disappear in the environment, it has properties where it attracts

⁵ WRAP (2022). No Plastic Packaging -Sell fresh uncut produce loose... <https://wrap.org.uk/media-centre/press-releases/no-plastic-packaging-sell-fresh-uncut-produce-loose-says-wrap-report>.

and holds toxic materials, it can enter the bodies of numerous species – just to name a few. It has recently been added to the list of materials under the Canadian Environmental Protection Act and there is existing research pointing to a myriad of potential problems for the use of plastic and the challenges in cleaning it up. With that in mind, Recycle BC should be minimizing its risk and exposure to changes in the allowable uses and perceptions of plastic and subsequent declines in markets for recycled plastics. Actions such as working with producers to increase the use of glass and other inert materials for more local, refillable loops should be pursued.

5.3 Performance Targets

5.3.1 Program Recovery Rates

The program is expected to meet a 75% recovery (or more accurately collection) rate or a higher target set by the Director. Given that this recycling system and program is well established, far higher targets are suitable. The change to aligned recovery rates is suitable as is the change to exclude non-PPP that is collected.

Further recommendations include:

- Including an estimate of the PPP introduced by small producers and adding that to the denominator for a more accurate representation of the PPP introduced to BC.
- Changing the recovery (collection) targets to 95% (including the addition of the small producers material and exclusion of the non-PPP) for 2023 reaching 100% by 2027. Every bit of PPP not collected continues to burden the environment as well as local and First Nations governments. Recycle BC has shown that these higher targets are more suitable and achievable. It is unclear in the plan why lower targets than what has already been achieved would be appropriate for a program aiming for continuous improvement, nor why they are labelled as ambitious.
- Providing an actual recovery rate (PPP recycled [not including the portion that is not sold to market for recycling or goes to landfill or other disposal]/ total PPP introduced to BC [including from small producers]) and set a clear, ambitious target of no lower than 75%.
- Developing a metric that shows the total PPP introduced to the market per capita and setting targets for improving collection in each regional district. Note currently Peace River, Northern Rockies, Central Coast and Bulkley-Nechako are well below the others and this may be in part due to the lack of sufficient infrastructure and suitable incentives for service provision.

5.3.2 Material Category Performance Targets

It is good to measure the performance by material category but given that there is such a variation in the performance of plastic types, the program should break these categories further into each type of plastic (1, 2, 3, 4, 5, 6, 7, foam, plastic bags and overwrap, and other flexible packaging).

When targets are achieved or not or metrics go over 100%, there should be some explanation of what is changing in the system to influence these numbers in the annual reports.

Targets for the recovery (collection) rate should be 95% in 2023 for all materials rising to 100% by 2027 with the exception of flexible plastic and foam which should have targets to decrease their use in packaging.

As noted above, the supply of PPP from small producers should be included in calculations of results for these targets as well. There should be actual recovery rates (how much of total PPP introduced into the market was recycled) with clear, ambitious targets no lower than 75%.

5.4 Performance Metrics

We support the collection/recovery rate metrics listed including reporting by Regional District but the program should also report by community (including contamination rates) and provide this data direct to each community.

The Accessibility metrics are also useful but should include a target to cover 100% of communities (including First Nation communities) with curbside or staffed drop off of garbage by 2027. Other metrics should show:

- the percentage of total population with service as well as percentage of communities (but not including communities served only with irregular, infrequent mobile collection events)
- Percentage of multifamily households serviced by community
- the percentage of each of total estimated costs that Recycle BC pays for collection (by curbside, multifamily, depot and streetscape), transport and processing as well as the total percent that Recycle BC pays for all of collection, transportation and processing

The Consumer Awareness Target should be 95% increasing to 100% by 2027. Metrics should include surveys to understand why residents do not use available systems.

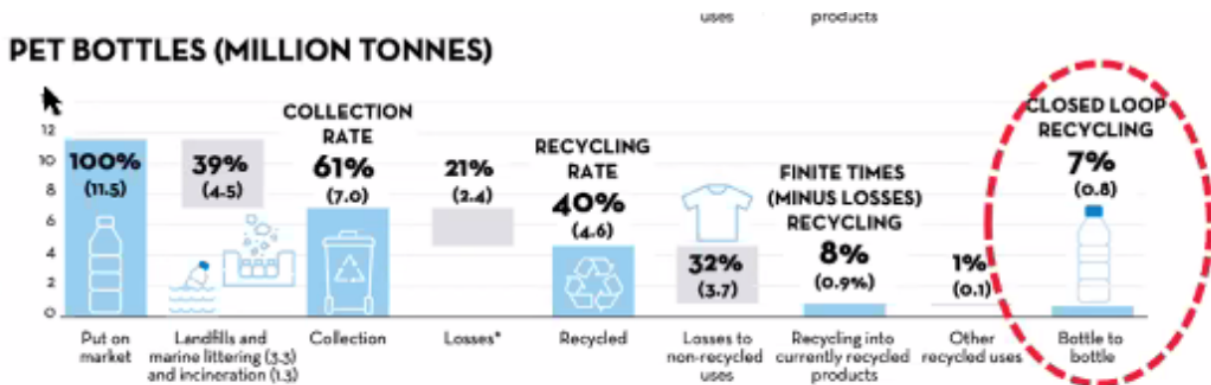
Pollution Prevention Hierarchy Targets should include targets for collected PPP to reuse and recycling commodity markets (excluding use as engineered fuel). Targets and metrics should be set for:

- The number of producers directly contacted and the changes producers made to their packaging (to increase each year)
- Reduction of PPP in total (mirroring or exceeding the legally binding reduction targets in the EU) and reduction of specific hard to manage types (all flexible plastics, expanded polystyrene, etc.)
- Amount of PPP that has been reused or refilled (mirroring or exceeding the legally binding reduction targets in the EU that include four sectors: takeaway hot/cold beverages 80%, takeaway food 40%, E-commerce 50% and transport packaging)
- Decreasing use of virgin fibre in printed products
- Decreasing toxic dyes and additives in PPP (including PFAS and similar)
- Decreasing the amount of material disposed aiming for zero by 2027

- Decreasing downcycling and increasing upcycling. The program should be more transparent about the retention of value in its materials
- Sector-specific recycled content
- Number of waste composition studies Recycle BC participated in and funded its share
- Decrease in amount of PPP found in waste composition audits
- Number of community clean ups funded and amount and type of materials collected (as well as a brand audit to help allocate costs fairly)
- A target of zero for engineered fuel, waste to energy and any other process that results in the destruction of the materials and report on any materials that go to these systems.

The program should report annually on:

- The percentage of the market not paying into BC’s recycling system (including the small producers) as well as:
 - Number of outstanding free-riders Recycle BC and CSSA are pursuing in its reporting cycle
 - Number of compliance referrals made by CSSA to the ministry for compliance follow-up
- The number of corporate members with ESG frameworks with annual reporting to support upstream corporate actions
- A list of incentives and programs that Recycle BC has undertaken to drive redesign, reduction and reuse/refill
- The results of these incentives and programs
- Comparison of communities with higher costs and the collection and recovery rates. Similarly for single stream versus multistream collection
- The circularity of its packaging (like-to-like) as in the figure⁶ below:



⁶ Credit: Zero Waste Europe.

Note that the 2021 Recycle BC Annual Report mentioned a 77% Provincial Recycling target. Is this a new target established by the statutory decision maker for Recycle BC to benchmark its performance recovery rate? Annual reports should explain the source of these numbers.

GHGs

Recycle BC has reported on its scope 1 and 2 emissions and some aspects of scope 3 but a further analysis of the full systemic GHGs from packaging (as well as the interrelationship with the products) should be done, followed by the development of a strategy to decrease the system-wide GHGs through less packaging, more reuse of packaging and more localized loops of product delivery.

GHG emissions should have a target to decline each year through smaller loops of materials, especially with reuse. Note that too often plastic is touted as a way to save GHGs over the use of glass but refills and reuse of glass in local loops is far preferable to plastic transported long distances. The measurement of GHGs should be for systemic emissions and not solely for direct program operations.

Costs are another important measure and should include costs saved by local governments (and their taxpayers) and from reduced environmental harms (as well as ongoing environmental harms). A measure should be presented for total costs and remaining externalized costs.

Financial transparency should be a goal and Recycle BC should provide detailed financial information annually.

As newspaper metrics are collected by another party, reporting of similar metrics to the above where suitable should be requested.⁷ Recycle BC and the MOECCS should work to ensure that newspapers and newsprint remain regulated items.

Section 6 Consultation

Recycle BC is to be commended for engagement with environmental groups as well as local governments, First Nations, Regional Districts and others and we hope that this raises the bar for other programs and engagement. We hope that the program will integrate the feedback to make as strong a program as possible.

⁷ While newspapers have a slightly different system, note that we fully support the inclusion of newspapers under the Regulation and the requirement to fully pay their full share of costs. While the industry may be experiencing challenges and is vital for a thriving democracy, allowing ongoing externalization of costs is not appropriate. The industry requires support by addressing the root causes of the current challenges instead rather than a free pass on pollution and producer responsibility.

Institutional, Commercial and Industrial (ICI) PPP

This material is not regulated yet but there is a very strong interest in having producer-funded systems to handle this material as well. Often the materials are exactly the same as the residential PPP with the same producers. In fact, items purchased in retail stores may have been accounted for in the Recycle BC program and end up in an ICI setting where it is not accepted for recycling as part of the program. There are many synergies that could be had from addressing all packaging and more opportunities that would open for redesign and reuse from an integrated comprehensive system. Small communities, in particular, that had collected recycling prior to the advent of residential PPP EPR were challenged to collect, market and transport the remaining portion which resulted in the cessation of ICI recycling in some cases. We recommend that Recycle BC examine the opportunities to bring about an integrated system and leverage its knowledge of recycling PPP in BC to be prepared to offer its services in advance of regulatory change.

In conclusion

The program plan needs stronger targets and more ambition in achieving the outcomes intended by the CCME Canada-wide Action Plan for EPR. This plan renewal, at a time when BC is planning to develop a Circular Economy Strategy and the recent UN Biodiversity agreement emphasizes the need to minimize our collective impact, is an opportunity to strengthen governance, reduce environmental impacts and the efforts and initiatives in this area should be strengthened, alongside the creation of related targets for redesign, reduction, reuse and refill. That said, we look forward to continued improvement of this program.

Sincerely,
Sue Maxwell,
On behalf of Zero Waste BC

Jamie Kaminski
On behalf of Zero Waste Canada