

Nov 30, 2022

## ZWBC Feedback for Clean BC's Plan to Expand the Recycling Regulation

Thank you for the opportunity to provide feedback on this five year action plan for EPR. 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. The Zero Waste Hierarchy which should be used to maximize the benefits of waste solutions can be found [here](#). The concept of Zero Waste closely aligns with that of a Circular Economy to which the Province has committed to develop a provincial strategy.

We are **very supportive** of the inclusion of more product categories in the Recycling Regulation. Our current resource consumption systems of linear take-make-waste not only create waste and pollute our environment but also generate a huge amount of greenhouse gases which constitute some of the discharges that threaten the environment and human health. All four categories long been requested for inclusion by local governments and others. Specific comments are:

1. Mattresses, box springs and foundations -we agree that all of the elements listed (futons, sofa bed mattresses, RV mattresses, crib-size mattresses, mattress toppers, upholstered foundations) should all be included however the province should do a review once the program has been running for two years to see what other forms should be regulated. This will ensure any gaps are covered and offer an opportunity to improve the program and ensure it is fulfilling the needs identified. The inclusion of pick-up service is essential for these items and should be extended to pick up of any old, unwanted mattresses (even if a new one has not been purchased) to help prevent the illegal dumping of these items. The collection of illegally dumped mattresses should be for the whole province, not just in municipal spaces. This will spur the program to develop robust collection services and alleviate a long standing issue of illegal dumping along the back roads of regional districts.
2. Compressed Canisters and Fire Extinguishers -the inclusion of all items listed (single use compressed canisters, fire extinguishers, refillable propane tanks, handheld fire extinguishers and spray foam/adhesives, bear spray and unregulated aerosols including remaining content) is welcome. It is particularly important to include the refillable propane tanks as their life span has become more limited and this may encourage producers to make them more durable or develop repair mechanisms. To exclude these items will only incur ongoing costs and risks to the local governments and the environment which the regulation aims to avoid. We also support the possibility of

adding further categories in 2026. The remaining automotive containers should be included as well to make it very clear that all of these can be returned.

3. Batteries and Electronic Accessories -we support the inclusion of all of these and a plan should be made for a review in 2026 to see what other forms may be missing.
4. Medical Sharps -all sharps used for medical purposes for humans and animals should be included. Harmonization is a good goal but should be superseded by the need to have regulations be as all-encompassing of product types as possible (especially for the same or similar products that may have different uses). The program should provide safe sharps containers. BC Health Authorities should be included and the program may choose to partner with some types of clinics as collection points from their patients. By including all sources in BC, it should make for a clear, transparent, level playing field and allow for better integration of collection into the flow of these materials.

We also support the regulatory amendments noted however more could be done to amend the regulation to have it meet the intended purposes, namely:

- Require producers to not just collect and manage products but also redesign systems to deliver the same services using fewer materials, less toxic materials and generating less waste. This should also include a real focus on reduction, reuse, refill and repair (depending on the nature of the product). Perhaps renaming the Regulation to be the Extended Producer Responsibility Regulation would make this clearer. Set targets for not just collection but also redesign, reuse, repair, refill. The *Recycling Regulation* requires everything to be done at a higher level of the pollution prevention hierarchy such as reduce then reuse before moving down to the next (recycling) however to date there has been very little action by EPR programs to do anything but collect and recycle or dispose.
- Targets for accessibility would ensure opportunities for recycling across the province.
- Targets for consumer awareness are also needed to reduce consumer confusion and increased participation.
- Reporting by programs of their economic input and job creation will negate the need for the province to conduct these.
- Other edits to ensure the regulation delivers the intended benefits towards a circular economy.
- Increased enforcement capacity with high fines for failure to comply similar to other provinces.

There is a strong need for the Province to consider additional tools and policies that could facilitate reuse, refill, and repair in the future. We think that this should include engaging with producers to support the move towards reuse, repair and refill. Additional measures should also be taken to drive redesign, reduction and reuse as intended in the CCME *Canada-wide Action Plan*.



Once again, thank you for the opportunity to provide feedback and we are happy to discuss these comments.

Sincerely,

Sue Maxwell  
Board Chair,  
Zero Waste BC