

December 15, 2022

**Recycle BC**  
**405-221 West Esplanade**  
**North Vancouver BC**

Sent by Email: [consultation@recyclebc.ca](mailto:consultation@recyclebc.ca)

Dear Recycle BC,

**Re: Comments on Recycle BC Packaging and Printed Paper Extended Producer Responsibility Plan – Consultation Draft, September 29, 2022**

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On behalf of the Board of the Regional District of Kootenay Boundary, thank you very much for the opportunity to provide feedback on the Packaging and Printed Paper Extended Producer Responsibility Plan – Consultation Draft, September 29, 2022 document (Draft Program Plan). The Board discussed the draft at its meeting yesterday and has serious concerns which are outlined below.

**Background**

The RDKB operates four Recycle BC depots for the collection of residential recycling at the McKelvey Creek Landfill (Trail), Christina Lake Transfer Station, West Boundary Landfill (Greenwood) and Rock Creek Transfer Station. A private depot is located in Grand Forks.

The RDKB also operates a depot at the Beaverdell Transfer Station, which collects packaging and printed paper materials from residential sources. It is not funded by Recycle BC, even though for many years we have requested that this depot be included in our agreement.

Under your EPR program, Recycle BC is responsible for costs associated with collection, transportation, processing, etc. The RDKB is paid a financial incentive based on a per tonnage rate, to offset operational costs at the collection depot. However, the incentive is not sufficient to cover actual depot costs.

**Key Points and Associated Comments Identified in the Draft Program Plan:**

**1. Definition of Packaging and Printed Paper and Impacts of the 2020 amendments to BC Recycling Regulation**

- Beginning January 1, 2023, additional materials, including designated single-use products and designated packaging-like products, will be included in the definition of packaging and printed paper products.
- Comments:

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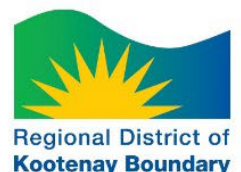
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- The definition of Packaging and Printed Paper encompasses a varied and significant product list for which materials are regularly and frequently purchased by residential customers and require frequent and ongoing access to recycling options.
- The collection of the most challenging products and those with the most significant and harmful impacts to the environment are completed primarily through the use of depot collection.
- The addition of these products to the BC Recycling Regulation is fully supported, and it is appreciated that Recycle BC is taking on the collection of these products.
- It is essential to maintain and or even expand the depot collection network to ensure that these problematic plastic products are collected appropriately for recycling.

## **2. New community eligibility criteria for Integrated Recycle BC Collection Services are being proposed, which apply to both new and existing depots.**

- Taken directly From the Draft Program Plan:
  - "At present, depot collection service (whether combined with curbside and multi-family collection or as a stand-alone service) is the primary method through which Recycle BC provides Integrated Recycle BC Collection Services."
  - "Recycle BC will honour existing depot agreements with collectors that provide collection services in communities that do not meet the eligibility criteria outlined in Appendix C but may not take steps to replace this service if the current collection partner decides to no longer provide this service."
  - "Recycle BC will also permit local governments to establish and operate satellite depots in communities that do not meet the eligibility criteria outlined in Appendix C, subject to Recycle BC review and approval. A satellite depot is an approved depot operating to specific standards, from which the collector (depot operator) transports the PPP to their principal depot for pick-up by the designated post-collection service provider."
- Comments:
  - As a result of the new criteria, a significant number of Recycle BC depots operated by local governments across the province are at risk of being eliminated from the program once existing agreements expire, including two in the Boundary region of the RDKB.
  - Should these depots be closed, it will create cascading impacts to surrounding depots, which may not be able to appropriately manage the additional materials. For example: increased traffic and line ups, greater volumes of materials to process, and complaints due to limited hours of operation, especially from residents who have had to travel 40km to access recycling opportunities.

- Closure of depots will also have the following unintended (or maybe intended) consequences: transfer of greenhouse gas emissions and fuel costs to residents and local governments.
- How exactly did Recycle BC determine that a 40km distance from an established depot was a reasonable distance to travel for recycling opportunities? If a resident has a grocery store (or equivalent place to purchase PPP) in their community, should they not be provided an equal opportunity for recycling?
- Utilizing population statistics in determining service level provision may not be a representative way of determining depot viability. We would like to see a breakdown of all of the depots across BC and the tonnages that have historically been diverted through these depots.

### **3. Financial Incentive Methodology**

- Taken directly from the Draft Program Plan:
  - "Costs associated with collection in communities that do not meet the eligibility criteria outlined in Appendix C, including the operation of applicable depots and satellite depots, will be excluded from collection cost studies."
  - "Once new collection service agreements have been published inclusive of the revised financial incentives, each applicable collector must then decide whether to renew its collection service agreement with Recycle BC."
- Comments:
  - It could be argued that the collection costs for existing depots that do not meet the eligibility criteria in Appendix C are higher than depots that would meet the criteria. Assuming costs are presented on a \$/tonne basis, and considering fixed costs of depot operation, those depots that collect lower tonnages would have higher operational costs. These costs will no longer be considered in collection cost studies.
  - Although Recycle BC has indicated an intent to honor existing depot agreements for those depots that do not meet the eligibility criteria, the language in the current Draft Program Plan would potentially allow Recycle BC to offer incentive rates that are significantly lower than would be acceptable to existing depots.
  - Once a depot has been established in a community it is almost impossible to remove that service without significant impact to residents. A local government would be placed in the position of having to accept the incentive rates from Recycle BC and ultimately pay a greater portion of the depot operating costs.
  - Should a private depot choose to not accept the incentives offered by Recycle BC, this would result in the local government having to step in to establish a satellite depot, wherein even more costs (capital, operations, transportation) are paid for by the general taxpayer. In addition, the local

government would also be obligated to track and report on the resulting green house gas emissions.

- The Recycle BC Program is already not a full producer-pay program and in essence, Recycle BC is setting up the ability to further transition costs to the taxpayer for the collection and recycling of packaging and printed paper. This is in direct conflict with the basic principle behind the BC Recycling Regulation.

#### **4. Performance Targets**

- Comments:
  - We appreciate that Recycle BC has been transparent in identifying the historical method for calculating recovery rate and the inclusion of collected non-program materials (garbage) in this analysis.
  - Looking at the program recovery rates presented in Appendix D of the Draft Program Plan, it appears that garbage (non-PPP) has been utilized in the past to inflate the recovery rate achieved for program materials. If garbage is removed from the calculation, Recycle BC did not meet the required 75% recovery rate for the years 2016-2019, as is legislated in the BC Recycling Regulation. While we appreciate that moving forward is potentially more important than focussing on the past, this accounting practice should be clearly addressed by the Ministry of Environment and Climate Change, to ensure that all Stewardship programs have a clear and equal understanding of how recovery rates are calculated and that all expectations are met. From a public perspective, the inclusion of non-product materials to artificially inflate recovery numbers creates a lack of trust in the system.
  - The RDKB supports the transition to utilizing an "Aligned RR methodology".
  - Recycle BC proposed recovery rates are dismal for the "hard to manage and collect" materials such as Styrofoam and flexible plastics. Furthermore, the majority of these types of materials cannot be effectively collected at curbside; as such, an extensive and comprehensive depot network is required to minimize the environmental impacts of mismanagement of this product.
  - In looking at the performance targets set, it seems that Recycle BC is setting the highest target rates for those products that are the easiest to collect (curbside) and have the greatest and most consistent market value. While it is appreciated that the market value of the products collected does have financial influence on program funding, more focus and effort (in the commitment to higher targets) should be put toward the collection of plastic film and Styrofoam products that have the greatest environmental impact when not managed properly. Given all the controversy and concerns surrounding plastic pollution, a proposed target of 25% by 2027 for Flexible Plastic would be viewed by many as sub-standard at best, especially since the previous target was 27% by 2023.

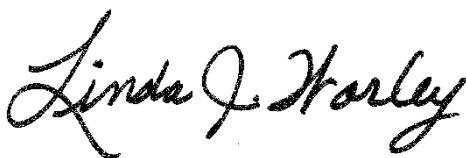
- Please confirm that the material category performance targets will be calculated similarly to the program recovery target in that collected “garbage” will not be utilized to arbitrarily inflate the recovery numbers.

## 5. General Comments

- The addition of single-use packaging and packaging-like products will increase the amount of materials generated by residents to be recycled. This is viewed as a positive; however, the accessibility outlined in the Draft Program Plan is far from adequate to provide reasonable access to recycling services.
- It is unacceptable for Recycle BC to reduce the depot collection network that already exists. The goal of continuous improvement should not be for Stewards to figure out innovative ways of transitioning costs back to the taxpayer.
- In various areas of the document, the language “reduce green house gas emissions” is utilized, but with no supporting evidence or examples of how this is to be achieved. It is suggested that greater clarity be provided around this, as one could interpret the potential closure of depots or transition of transportation requirements to local governments as one methodology being utilized. It would be more acceptable to have language such as “encouraging the use of electric or RNG vehicles for transportation as much as possible”
- Overall, the Draft Program Plan as currently worded does not meet the Program Delivery Principle of “enhance resident service levels”.

Thank you for the opportunity to provide comments. The RDKB looks forward to reviewing future versions of the Draft Program Plan wherein changes are made to adequately address the concerns identified in this letter.

Sincerely,



Linda Worley  
Board Chair

cc Mark Andison, CAO  
Janine Dougall, General Manager of Environmental Services  
Roly Russell, MLA—Boundary Similkameen  
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