



Reference: 359693

August 12, 2020

Brad Sperling, Chair
and Directors
Peace River Regional District
PO Box 810
1981 Alaska Avenue
Dawson Creek BC V1G 4H8

Sent via email: prrd.dc@prrd.bc.ca

Dear Chair Sperling and Directors:

Thank you for your letter of July 22, 2020, requesting provincial support for a hybrid recycling collection system for low population density regional districts. I appreciate the Peace River Regional District's (PRRD) commitment to recycling and I am aware of the challenges related to recycling in areas with lower population densities.

Recycling programs are operated by extended producer responsibility (EPR) agencies on behalf of their member businesses (producers), that are obligated under the Recycling Regulation. The producers are responsible for collecting and recycling the products they supply to the B.C. market and the associated costs. The ministry is responsible for approving program plans and performance measures such as ensuring that adequate service levels are being provided.

As EPR plans are renewed, the ministry is requiring programs to demonstrate continuous improvement, including expanding services to more communities. As you know, Recycle BC's renewed plan for packaging and paper products (PPP) was recently approved, and as part of its continuous improvement measures, Recycle BC (RBC) is conducting a depot accessibility study as well as studies to assess curbside collection criteria. Following consultation, such criteria will then be submitted to the ministry for approval. The current plan also provides greater flexibility in how services can be provided to smaller, rural and remote communities, such as options for satellite depots. As RBC continues to increase its various recovery rate targets, it will need to further expand its program.

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Regarding your request for me to support the PRRD to become the conduit for RBC to expand its service in the area, I encourage you to raise this matter once again directly with RBC as to which communities in the PRRD qualify under the current curbside eligibility criteria, as well as any additional opportunities to expand accessibility of RBC services in the PRRD through new criteria being developed. The criteria being developed will bring greater certainty for those wanting to access these services, while uniform collection standards will ensure what is collected can be properly marketed for recycling.

You may also be interested to know that the [CleanBC Plastics Action Plan](#), released in 2019, sought feedback on new policy opportunities and proposed amendments to the Recycling Regulation, including the expansion of EPR programs. Responses were welcomed from all sectors of B.C. including the public, local governments, Indigenous groups and a range of stakeholders. The ministry will be releasing a “What We Heard” report and this feedback will help inform the appropriate policy or regulatory response(s).

We appreciate the concerns you have raised regarding PPP material from the Industrial, Commercial and Institutional (ICI) sector and recognize that the proper management of ICI PPP is a challenge for local governments.

Work to explore new regulatory or policy approaches, including the PPP from the ICI sector, would be accompanied by further consultation with stakeholders, local governments, Indigenous groups and the public in advance of specific regulatory changes. We are committed to continuing and building on our continent-leading EPR program in a timely and effective way that responds to the clear message we have heard from local governments around B.C. about the importance of including the ICI sector.

I hope this provides you with some assurance that the EPR program for packaging in B.C. is continually evolving and improving, and that consideration is being given to expanding the Recycling Regulation to cover more materials.

Thank you again for taking the time to write.

Sincerely,



George Heyman
Minister



PEACE RIVER REGIONAL DISTRICT

July 22, 2020

The Honourable George Heyman
Minister of Environment and Climate Change Strategy
PO Box 9047 Stn Prov Govt
Room 112, Parliament Buildings,
Victoria, BC V8W 9E2
Via email: ENV.Minister@gov.bc.ca

Dear Minister Heyman:

Re: Hybrid Recycling Collection System for Low Population Density Regional Districts

As you are aware, collection of packaging and printed paper (PPP) from residential sources is handled by the stewardship organization, Recycle BC (RBC). While the RBC program services other regions of the province, only 2% of the recyclables in the Peace River Regional District (PRRD) are collected through RBC. This is due to the fact that:

- RBC has an agreement with the PRRD to receive PPP from 10 rural transfer stations.
- None of the member municipalities are signed on with RBC.
- Only two member municipalities (Dawson Creek and Fort St. John) meet the population criteria to participate in the RBC program for curbside collection but are not signed on.
- No RBC depots exist in any of the PRRD's member municipalities.

In 2019, the PRRD processed 4,530 tonnes of recyclables in the region via 3rd party contract for baling and shipping at a cost of \$2 million. Given the rising costs and the fact that 50% of this material is residential PPP, a business case (attached) was constructed which would allow region residents the opportunity to participate in the RBC program. In short, the PRRD would be the representative for all 63,000 residents of our incorporated and unincorporated communities as a direct point of contact with RBC. This business case was presented to RBC but was ultimately rejected as it did not fit with their current model of working directly with incorporated municipalities that meet section 4.3.5 of their program standards curbside collection. This unfortunately means that very few area residents will ever have access to the RBC stewardship program.

To that end, the Regional Board respectfully requests provincial support for a hybrid recycling collection system for low population density regional districts to work within current stewardship programs, based on the business case provided.

Yours truly,

Brad Sperling
Chair

Attach: RBC and Comingled Curbside Business Case

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PLEASE REPLY TO:

☒ Box 810, 1981 Alaska Ave, Dawson Creek, BC V1G 4H8 Tel: (250) 784-3200 or (800) 670-7773 Fax: (250) 784-3201 Email: prrd.dc@prrd.bc.ca
☐ 9505 100 St, Fort St. John, BC V1J 4N4 Tel: (250) 785-8084 Fax: (250) 785-1125 Email: prrd.fsj@prrd.bc.ca



PEACE RIVER REGIONAL DISTRICT

The Peace River Regional District (PRRD) has approximately 63,000 residents living in 120,000km². Recycling in the Region is handled two ways, either through a private contract, or through Recycle BC Depots. The PRRD has been a contractor on behalf of Recycle BC (RBC) since November 30, 2013. Currently there are 10 designated RBC Depots and 3 satellite sites that operate at Rural Transfer Station sites within the Region.

In 2019, a total of 4,657 tonnes of recyclables was diverted from landfills in the PRRD. Of that, only 130 tonnes or 2.8% was contributed from RBC depots in the region. The remaining 4,527 tonnes was processed by the PRRD's private recycling contractor and is split 50/50 from residential and commercial sources. Currently there are no RBC Depots in 6 of the 7 municipalities in the PRRD. The majority of the residential recycling stream within these municipalities are being handled by the private contractor outside of the RBC program. It is recognised that a successful model for Rural Regional Districts with low population densities, especially in northern BC, has been a challenge for RBC.

In an effort to address this challenge, and provide increased access to RBC in our region, the PRRD has a proposal to address service access challenges for our 65,000 residents. The idea is to establish the PRRD as a single source point of contact for RBC in the region. In this scenario, the PRRD would coordinate directly with RBC for the consolidation of residential recyclables from depots and curbside collection programs within the entire Region. The material processed by the private recycler on behalf of the PRRD is collected through:

1. Depot Collection (Residential/Commercial)
2. Commingled Curbside (Residential)

Recognising that the private contractor does collect materials from both residential and ICI sources, we believe that we should first target commingled curbside recyclables as they are strictly residential in nature and are easily isolated from ICI materials collected in the depots. Further, the recyclables collected in the commingled curbside programs are PPP materials and should be included in the RBC program. Below is an overview of curbside statistics and a framework of how the interaction between RBC, the PRRD, and remaining entities would work.

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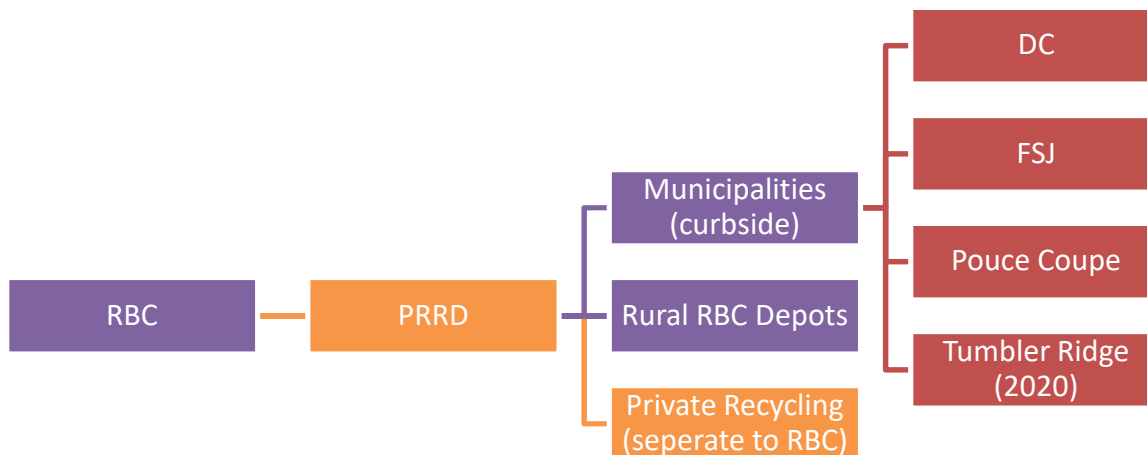
Commingled Curbside Collection in the PRRD

Currently there are 3 municipalities that offer curbside collection for commingled recycling in the Region since 2016. These programs closely follow the RBC program in that they do not allow plastic bags, films, glass, and styrofoam to be collected in the commingled curbside container. The 3 municipalities provide curbside collection for their residents (weather through a private contract or by municipal staff) which is consolidated at a central point. From there, the material becomes the responsibility of the PRRD. The material is sorted of contaminants, baled, and collected by a private contractor who then arranges to have it shipped to market. The table below illustrates the tonnages collected in 2019:

| Municipality | Population (Stats Canada 2016) | Households Served | Commingled Tonnage | Consolidation Point |
|---------------|--------------------------------------|----------------------|-----------------------|------------------------|
| Fort St. John | 20,155 | 6,816 | 716 | R3 Recycling |
| Dawson Creek | 12,178 | 4,694 | 458 | DC Recycling |
| Pouce Coupe | 792 | 350 | 34 | DC Recycling |
| Totals | 33,125 | 11,860 | 1,208 | |

Additionally, the District of Tumbler Ridge will begin to provide commingled curbside collection for their residents in 2020. At this time it is estimated that 190 tonnes of residential recyclables will be captured through their curbside program annually.

In order to capture these 1,400 tonnes under the RBC program, we proposed that the PRRD becomes the central point of contact for RBC as per the following structure:



The material will be collected, sorted, and baled by the private recycling contractor on behalf of the PRRD. The PRRD would look to RBC to market the baled material and provide the collection offset for the 11,860 (plus Tumbler Ridge) residential properties serviced in the region.

Depot Collection in the PRRD

The remaining 3,319 tonnes of recyclables collected by the private contract was done so through a series of depots in the region. This material is currently a mix between residential and ICI sources, in 2019 the composition was approximately 30% (996 tonnes) residential and 70% (2,323 tonnes) For the residential material collected, the total 996 tonnes PPP that could potentially be included into the RBC program. This additional material can be discussed at a later date.

In closing, the addition of the Region's commingled curbside material into the RBC program as described could prove to be a viable solution for low population density Regional Districts. The method proposed closely follows the "New Curbside Programs (4.3.5)" guideline from the Packaging and Paper Product Extended Producer Responsibility Plan as it meets all the criteria if we look at the Regional District as the community being serviced by RBC.

Additionally, the inclusion of this material would boost the Operational Effectiveness Indicator within the PRRD that RBC reports on annually. In 2019 the 130 tonnes of PPP material were collected in the PRRD through the current RBC program equates to a per capita rate of only 2.06kg/capita. The addition of the approximately 1,400 tonnes of commingled curbside material boosts the per capita rate to 22.7kg/capita captured in the PRRD. This also brings the RBC program significantly closer to the regional target of 40kg/capita.