



Recycling Regulation Policy Intentions Paper:
PRRD Comments for the Ministry of Environment & Climate Change Strategy

The following comments and questions from the MoECCS are broken into sections as per the Policy Intentions Paper released on September 12, 2020. Deadline for submission of comments is November 20, 2020:

New Schedule for Mattresses - The ministry is currently evaluating the opportunity to add more products to the Recycling Regulation, including mattresses and foundations.

Q: Do you have comments or suggestions on the intention to add mattresses and foundations to the regulation?

1. Noted that the paper reflects rural regions of BC where “cost of recycling is too high and mattresses are being landfilled.” EPR for this material must reflect true regional costs of processing and any eco-fee applied must have the same consideration.
2. Paper cites \$40 per mattress to recycle – how is this rate calculated?
3. This EPR program must apply to all sources (industrial, commercial, institutional AND residential).

Q: Are there exemptions to this new product category that you believe should be considered?

1. Exemptions for this product category should not be considered in order to ensure that consumers have a place to drop off mattresses, regardless of type. Exemptions in certain EPR programs can result in customers frustrated with being turned away from drop-off locations. Instances of illegal dumping may also result from such exemptions.

Update Existing Schedules and Product Categories –

The ministry is currently evaluating the opportunity to add more products to the Recycling Regulation, including the Residual Product Category, Schedule 2 (currently includes paint, solvents, gasoline, pesticides, and pharmaceuticals)

Q: Do you have comments or suggestions on the intention to regulate more product types?

1. Regulating additional residual products will provide more options for people in the rural areas where there currently are no takeback programs.
2. Recommend that this expanded EPR program must accept materials from all sources (industrial, commercial, institutional AND residential). Allows for more efficient collection and economies of scale while supporting true diversion from landfills.

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PLEASE REPLY TO:

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Q: What product types should be prioritized for regulation?

1. Product types listed must include the smaller volumes used by households to provide accessibility and prevent risk of illegal dumping.

Q: Do you have comments or suggestions on how to clearly define/classify product categories in the regulation that are user friendly?

1. No comment.

Q: Are there product types you believe should be exempt from the regulation, beyond products such as cleaners that are intended for use down the drain?

1. The product types covered must include both residential and ICI sources to allow for economies of scale and promote access to rural populations.

The ministry is currently evaluating the opportunity to add more products to the Recycling Regulation, including Schedule 3, the Electronic and Electrical product category.

Q: Do you have comments or suggestions on the intention to regulate more electronic and electrical products, including batteries?

1. No comments.

Q: What product types should be prioritized for regulation?

1. No comments.

Q: Are there product types you believe should be exempt from the regulation and may be better managed through alternative policy approaches?

1. The concern with exempting products is that there is a risk that if an individual is unable to drop off a broken/obsolete piece of electronics, this will result in illegal dumping. There has to be an option for the consumer to bring back the product, no matter what.
2. Policy updates must match the updated recycling regulation.

The ministry is currently evaluating the opportunity to add more products to the Recycling Regulation, including expanding Schedule 5 – Packaging and Paper Product Category beyond residential sources (applies to the RecycleBC program).

Q: While EPR for ICI packaging and paper has been suggested by some stakeholders, there are also other approaches that have been advanced for commercial business waste management. Do you have comments or suggestions on EPR or alternative policy approaches that address the need for greater diversion from landfills and to better manage ICI materials?

1. Increasing diversion of ICI materials from landfills is currently not practical for many businesses located in rural regional districts which is why said businesses default to bringing materials to the landfill. There are also challenges with increasing tipping fees to make

businesses prioritize waste diversion as there is a cost threshold where businesses may choose to send their waste across provincial borders because it is cheaper to do so.

2. Some rural regional districts collect 50% - 75% of packaging and printed paper from ICI sources and bale/transport those materials to market at their cost. To make EPR more practical, recyclables from all sources must be included to achieve economies of scale for collection in remote, rural areas.
3. Given the lack of access to EPR for remote, rural areas, the inclusion of ICI packaging and printed paper should be given higher priority.

Q: Are there sources of ICI waste that should be the primary focus for better management, such as food services, office buildings, or sports stadiums?

1. Construction and demolition companies generate large amounts of waste with very little sort before delivering to landfill in remote rural areas.

Marine Debris in B.C. – End-of-Life Management of Lost Fishing Gear- This Intentions Paper also provides further opportunity for people to provide feedback on approaches to improve fishing gear collection and management.

Q: Do you have comments or suggestions on policy approaches to better manage fishing gear?

1. N/A for the PRRD.

Implementation (of update to Recycling Regulation) - The ministry will review all consultation comments and feedback to inform the development of a multi-year strategy, including further outreach on proposed priorities.

Q: To help inform the development of the multi-year strategy, do you have comments or suggestions on what product categories outlined in this Intentions Paper should be prioritized for regulation?

1. Packaging and Printed Paper for ICI materials need to be top priority.
2. Soft Agricultural Plastics (Twine, bale wrap, silage film, feedbags) – while not outlined in the paper, this material is challenging to deal with and no program exists in BC with subsidy.