

ENVIRONMENT COMMITTEE

*HIS WORSHIP, THE MAYOR
AND COUNCILLORS*

**SUBJECT: UBCM PACKAGING AND PRINTED PAPER WORKING GROUP
POLICY PAPER**

RECOMMENDATION:

1. THAT Council forward a copy of this report to the UBCM and BC MLAs for information.

REPORT

The Environment Committee, at its meeting held on 2012 September 11, received and adopted the *attached* report in response to the UBCM Packaging and Printed Paper Working Group Policy Paper. The Committee is generally supportive of the direction taken in the policy paper with suggested changes/additions to the key recommendations.

Arising from discussion, the Committee amended the recommendation to send the report to BC MLAs for information.

Respectfully submitted,

Councillor D. Johnston
Chair

Councillor A. Kang
Vice Chair

Councillor N. Volkow
Member

Copied to: City Manager Acting Director Engineering
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TO: CHAIR AND MEMBERS
ENVIRONMENT COMMITTEE

DATE: 2012 September 05

FROM: ACTING DIRECTOR ENGINEERING

SUBJECT: UBCM PACKAGING AND PRINTED PAPER WORKING GROUP
POLICY PAPER

PURPOSE: To inform the Committee and Council on staff response to the UBCM Packaging and Printed Paper Working Group Policy Paper.

RECOMMENDATION:

1. **THAT** The Committee recommend Council to forward a copy of this report to the UBCM for information.

REPORT**1.0 INTRODUCTION**

Staff are in receipt of the *attached* (see Attachment #1) correspondence from the UBCM requesting comments on the UBCM Packaging and Printed Paper Working Group Policy Paper in advance of consideration by membership at the 2012 UBCM Convention.

The purpose of this report is to inform the Committee and Council on staff response to the UBCM Packaging and Printed Paper Working Group Policy Paper.

2.0 BACKGROUND**2.1 Regulatory Requirement**

In 2011 May, the *B.C. Recycling Regulation* was amended to include collection and recycling of packaging and printed paper by the producer. Unlike such programs in other parts of Canada, this program is to be funded 100% by the producer.

Under Schedule 5 of the Regulations, printed paper is defined to include “*paper that is not packaging but is printed with text or graphics as a medium for communicating information and includes telephone directories but does not include other types of bound reference books, bound literary books or bound text books*”.

The Regulation requires the producer of the product to submit a product stewardship plan to the Province by 2012 November 19. Once approved by the Province, the Plan is to be implemented by 2014 May 19.

At present, in accordance with Section 5(d) of the *B.C. Recycling Regulation*, the collection and recycling of packaging and printed paper by the producer is only required to be undertaken from residential premises and from municipal property that is not industrial, commercial or institutional property.

2.2 Multi-Material BC

In response to the regulatory requirement, Multi-Material BC (MMBC) which is a not-for-profit organization was established under the *B.C. Society Act* to develop, submit and implement a stewardship plan for packaging and printed paper. MMBC represents the producers (i.e. brand owners and first sellers of packaging and printed paper in B.C). The founding Board Members of MMBC include: Retail Council of BC, Food and Consumer Products of Canada, Canadian Federation of Independent Grocers, and Canadian Restaurant and Food Services Association. The Canadian Newspaper Association was also the founding member of MMBC, however it is unknown at this time whether they will be part of MMBC program. In addition, some producers could choose to pursue their product stewardship obligations independently which may impact collection and recycling efforts on multiple levels.

MMBC is developing the product stewardship program in phases. The first phase, which took place between 2011 November and 2012 February, was to publish and consult on two technical reports. The first report establishes a baseline of current recycling services taking place in BC and the second report discusses program design considerations and sets out sixteen (16) possible financing options for carrying out the Packaging and Printed Paper (PPP) Extended Producer Responsibility (EPR) Program. Staff had responded to the first technical report and Metro Vancouver had responded on the second technical report on behalf of member municipalities to MMBC as a means of having a consistent service delivery model in the region.

In 2012 March, the MMBC Board of Directors decided that its upcoming Product Stewardship Plan for the management of PPP would be based on the combination of two options: 1) contracts for collectors who service single-family and/or multi-family residences and/or public places; and 2) financial incentives paid to processors based on the amount of material they process for recycling. Details on the status of this Phase 2 portion of the work, including consultation with the stakeholders, have not been publicly available from MMBC to date. As noted elsewhere in this report, the deadline for submission of the Plan to the Province is 2012 November 19 and until the details of Phase 2 are brought forward to the stakeholders through a comprehensive consultation process, the full implications of PPP to the City are unknown.

To: Environment Committee
From: Acting Director Engineering
Re: UBCM Packaging and Printed Paper Working
Group Policy Paper
2012 September 05 Page 3

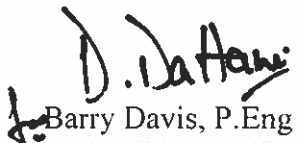
3.0 UBCM PACKAGING AND PRINTED PAPER WORKING GROUP POLICY PAPER

In 2011 November, the UBCM Executive approved the creation of a UBCM Packaging and Printed Paper (PPP) Working Group in response to the issues and concerns raised by some local governments with the inclusion of packaging and printed paper within the *B.C. Recycling Regulation*.

The UBCM Packaging and Printed Paper Working Group has now completed the policy paper and circulated it at local government staff level for comments in advance of consideration by membership at the 2012 UBCM Convention. In order to meet the tight response deadline of 2012 September 04, staff has forwarded the *attached* (see Attachment #2) response to UBCM on the subject policy paper. Staff is generally supportive of the direction taken in the policy paper with suggested changes/additions to the key recommendations.

4.0 CONCLUSION

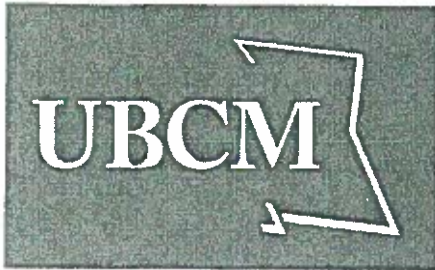
The UBCM Packaging and Printed Paper Working Group Policy Paper is supported with the suggested changes/additions to the key recommendation identified in staff correspondence to the UBCM. Staff will continue to monitor the outcome of Phase 2 work by MMBC and provide a separate comprehensive report to the Committee and Council.


Barry Davis, P.Eng
Acting Director Engineering

DD:br

Attachments

Copied to: City Manager



MEMO TO MEMBERS

August 13, 2012

RECEIVED IN
ENGINEERING DEPT.
FILE.

AUG 16 2012

COPY-REF:

City Manager
 Deputy City Managers
 - (C. Turpin & L. Chu)
 Dir. Eng. – for direct reply
 - Asst. Dir. Eng.
 Environ. Protection
 Dir. Planning & Bldg
 Dir. Finance
 Purchasing Manager

TO: Chief Administrative Officers
 FROM: UBCM Secretariat
 RE: UBCM Packing and Printed Paper Working Group Policy Paper

Refer To:	Noted
DJ	
ASST	✓

UBCM is distributing the attached policy paper for membership review in advance of consideration by the membership at the 2012 UBCM Convention. UBCM is seeking commentary at the staff level on whether the paper reflects the major issues and concerns of your community, particularly whether there are any major omissions from the policy paper.

At the November 2011 Executive meeting, the UBCM Executive approved the creation of a UBCM Packaging and Printed Paper (PPP) Working Group as part of the Environment Committee's 2011/2012 priorities. The PPP Working Group has been struck in response to local government concerns and issues with the inclusion of packaging and printer paper within the Recycling Regulation. The Working Group is designed to support a smooth transition in the responsibility of managing packaging and printed paper to producers.

The Working Group is comprised of six appointed local government staff representatives from all regions of the province, a UBCM staff representative, a representative from the BC Product Stewardship Council, and a Ministry of Environment staff member that sits as a subject matter expert on provincial policy and regulation.

Throughout Spring and Summer of 2012, the Working Group met to develop the enclosed policy paper. The purpose of the policy paper is to: identify key local government issues and concerns with the proposed product stewardship program for packaging and printed paper; propose recommendations for resolving potential local government issues with the implementation of the packaging and printed paper product stewardship program; build local government knowledge and capacity around packaging and printed paper product stewardship to assist in negotiations with producers; and support a smooth transition in the responsibility of managing packaging and printed paper (PPP) to producers.

For further information on either the policy paper or the Working Group, please contact Stacey Barker, Chair of the Working Group and Manager of Environmental Services, Fraser Valley Regional District at 604-702-5096, sbarker@fvrd.bc.ca, or Jared Wright, Senior Policy Analyst, UBCM at 604-270-8226 (ext.113), jwright@ubcm.ca

Please forward any comments on the policy paper to Jared Wright, Senior Policy Analyst, UBCM by email at jwright@ubcm.ca or by fax to 604-270-9116 by **Tuesday, September 4th, 2012.**

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TO: UBCM Members

FROM: ENVIRONMENT COMMITTEE

Director Rhona Martin, Chair
Mayor Sharon Gaetz
Chair Al Richmond
Chair Joe Stanhope
Councillor Lorrie Williams

**POLICY
PAPER(#1)**

2012 UBCM Convention

**RE: PACKAGING AND PRINTED PAPER
PRODUCT STEWARDSHIP**

1. DECISION REQUEST

That the paper be endorsed by the UBCM membership.

2. PURPOSE

The purpose of the policy paper is to:

- identify key local government issues and concerns with the proposed product stewardship program for packaging and printed paper;
- propose recommendations for resolving potential local government issues with the implementation of the packaging and printed paper product stewardship program;
- build local government knowledge and capacity around packaging and printed paper product stewardship to assist in negotiations with producers; and
- support a smooth transition in the responsibility of managing packaging and printed paper (PPP) to producers.

3. EXECUTIVE SUMMARY

The paper contains the following key recommendations for designing and implementing a packaging and printed paper (PPP) product stewardship program:

That producers are responsible for, and have an obligation to, manage one hundred percent (100%) of the packaging and printed paper waste in British Columbia. This obligation includes an extension of the PPP program to the industrial, commercial and institutional (ICI) sector within three (3) years, as well as local government compensation for the management of PPP materials that end up in local government waste streams.

That the packaging and printed paper product stewardship program provides an equitable level of service between urban and rural areas, and that existing levels of service be maintained or exceeded for those local governments that have established PPP programs in place.

That local governments be given the right of first refusal for providing packaging and printed paper product stewardship services under the new PPP program. This option would minimize and/or prevent any disruption to existing services, employment contracts, and community expectations.

That the design and implementation of the PPP program seek to minimize the program's environmental impact by eliminating the need for landfilling and/or incineration of program materials.

4. BACKGROUND

In May 2011, the Recycling Regulation was amended to include packaging and printed paper. The amendment shifts financial and administrative responsibility for managing these materials from local governments to the producers of packaging and printed paper (PPP). This transfer of responsibility is intended to incent producers of PPP to incorporate environmental considerations in the design of their products.

The addition of packaging, and to a lesser extent printed paper, is partly in response to local government requests. In particular, the UBCM membership has consistently endorsed resolutions calling for the development of strategies to reduce unnecessary product packaging, as well as the creation of product stewardship programs for packaging (1987-B69; 1990-A14; 1991-B18; 1995-B38; 1997-B11; 1999-B14; 2000-B20; 2004-B13; 2005-B115; 2006-B29; 2008-B31). Most recently, Resolution 2009-B39 called for all packaging to be placed under the BC product stewardship legislation. When considering packaging, the membership has similarly called for the addition of milk containers to the Recycling Regulation and the deposit refund system (2011- B38, 2010-B27).

The product stewardship program will be developed by five (5) key producers, which include: the Canada Food and Restaurant Services Association, Retail Council of Canada, Canada Newspaper Association, Food and Consumer Producers of Canada, and the Canadian Federation of Independent Grocers. The producers are represented by Multi Material British Columbia (MMBC), which is a not-for-profit agency established under the British Columbia *Society Act* formed in anticipation of the requirement to develop, submit and implement a stewardship plan for packaging and printed paper. MMBC's intention is to assume the role of a stewardship agency in order to discharge the obligations of PPP producers under Schedule 5 of the Recycling Regulation. However, some producers may choose to pursue their product stewardship obligations independently, which may impact collection and recycling efforts on multiple levels.

Since the amendment to the Regulation, several local governments have raised concerns over what service levels and targets will be included in the program. These concerns include, but are not limited to: how the program will work with local governments to ensure there is not a decline in service levels; how the interface with collection systems under union contracts will be managed; how collected materials will be managed; local capacity to manage any increase in collected materials; how the program will incent

more recyclable packaging; and how local governments could be compensated for the capital investments that have been made in the existing collection infrastructure.

In response to local government concerns and issues, the UBCM Executive approved the creation of a UBCM Packaging and Printed Paper Working Group, issued a call for nominations for representatives, and convened the first meeting in February 2012. The UBCM Packaging and Printed Paper Working Group is designed to provide a voice for local government on their expectations of an industry product stewardship program for PPP; provide information to build capacity in local government understanding of product stewardship as it applies to packaging and printed paper; and build local government capacity to effectively negotiate community interests with the producers.

In addition, the Working Group will: act as a forum for discussing local government issues, both individual and collective, with the producers; identify relevant issues pertinent to the materials/products and scope in the May 2011 amendment that may require negotiating with industry; and identify and propose recommendations to the producers for resolving potential local government issues with the PPP program implementation. The Working Group is comprised of six appointed local government staff representatives from all regions on the province, a UBCM staff representative, a representative from the BC Product Stewardship Council, and a Ministry of Environment staff member that sits as a subject matter expert on provincial policy and regulation.

Throughout the Winter and Spring of 2012, the Working Group met to finalize a terms of reference, identify local government concerns, and develop an issues compendium that would form the foundation of a policy paper. Delegations were also received from interested stakeholders, and communication materials about the efforts of the Working Group were distributed to local government area associations. The Working Group has sought to create recommendations that would advocate local government interests and positions, with the intent of having a policy paper considered by the membership prior to the producers' submission of a product stewardship plan in November 2012.

5. DISCUSSION

According to the 2007 Environment Action Plan, the provincial framework for any new or expanded product stewardship program must contain the following measures:

- be fully funded by the industry, in which the industry is responsible for all costs such as collection, transportation, and marketing of materials;
- maximizes the recovery rate of products from local landfills, with a recovery rate of 85% or higher;
- ensures the broadest choice of options for consumers, including the use of deposit refund systems and eco fees;
- ensures the operation of a mixed collection system, including return to retailer, curbside and depots; and
- links product stewardship programs to local solid waste management planning decisions of municipalities and regional districts.

The above position on product stewardship was endorsed by the full UBCM membership at the 2007 UBCM Convention, and acts as the foundation for discussion with the Province on all product stewardship programs, including packaging and printed paper.

Upon review of the amended Recycling Regulation, and as a result of Ministry of Environment information sessions, local governments have identified several key concerns and issues with respect to the new extended producer responsibility programs on packaging and printed paper. These concerns pertain to the scope of the program, program design, environmental impact, financial and service provision issues, as well as the role of local government.

Program Scope

While recognizing the functionality of focusing on residential collection, several local governments have identified concerns over the product stewardship program's focus on residential collection prior to industrial, commercial and institutional (ICI) collection. Local governments have invested heavily in the infrastructure, marketing and outreach of their existing collection and recycling programs, and some are concerned that producers may get to capitalize on the costly foundations they have laid. As such, local governments wish to see an expansion of the product stewardship program to the ICI sector as soon as possible, following the successful implementation of the program in the residential sector.

Local governments have also identified concerns over the seventy-five percent (75%) recovery rate identified within the amended Recycling Regulation. To maximize recovery rates, the rate should focus on specific material categories as opposed to overall packaging composite, and the rate should be applied to each local government to ensure equivalency between rural and urban areas. There is also the recognition that in spite of the target recovery rate, producers have an obligation to manage one hundred percent (100%) of the packaging and printed paper waste. This is consistent with the product stewardship model within BC where producers are responsible for the entire life cycle of products. In addition, the program should cover all areas that local governments are currently servicing.

Program Design

Local governments have identified the need to move beyond simply diverting PPP materials from local landfills and incinerators to actively putting in place incentives and measures to re-design and re-use packaging and printed paper materials. There is a recognition that in order to move up the pollution prevention hierarchy, the producers need to develop market based incentives and/or design requirements for their products. Such measures would diminish the potential for difficult to recycle or non-recyclable materials to be incinerated and/or landfilled, and would simultaneously reduce the carbon footprint of the product by minimizing production, storage, collection and transportation costs.

Built-in consultation mechanisms also need to be established with the product stewardship program. Local governments require meaningful consultation, both in

terms of time and opportunities, in the design of the PPP stewardship program as well as ongoing consultation and feedback mechanisms during the implementation of the program. Based on past experiences with product stewardship programs, local governments desire the opportunity to provide input on the program design if product stewards are not meeting their stated or expected service delivery levels. In particular, local governments require an enhanced dispute resolution process, whereby they have the right to receive compensation for impacted costs if producers are not providing adequate service levels that result in materials being sent to local landfills and/or incinerators.

More importantly, the product stewardship program should incorporate flexible options that local governments can select to best meet the needs and interests of their respective communities. Many local governments throughout BC have established collection systems for packaging and printed paper, each with a set of community expectations around service levels, as well as associated infrastructure and employment contracts. Some local governments have identified the potential for the product stewardship program to impact existing employment contracts, particularly if the producers decide to contract out collection services or rely on depots instead of using existing local government staff and curbside programs. Implementing a "one size fits all" approach will not yield the greatest results. To improve the effectiveness of the product stewardship program, local governments should have the choice of either continuing to deliver services with fair compensation or selecting the producer's contracted services for their communities. In effect, local governments should be given the right of first refusal for the provision of services. Similarly, the product stewardship program needs to be integrated with other waste management programs to create efficiencies, facilitate maximum recovery rates, and ensure high customer service.

Environmental Impacts

As stewards of their community, local governments are continuously implementing measures to protect the environment and address the impacts of climate change. Local governments believe that the product stewardship program should focus on clear environmental protection as opposed to simply the cost impacts on producers. The program should include measures and incentives for redesigning packaging, to ensure that the program moves up the pollution prevention hierarchy by eliminating the landfilling and/or incineration of collected program materials. Wherever possible, local governments maintain that producers should be seeking efficiencies within the collection, transportation and processing of materials to minimize the carbon footprint within affected communities.

Funding

Local governments have identified a wide range of costs associated with both their existing curbside collection programs for packaging as well as costs for the successful implementation of product stewardship programs. While British Columbia has a fully industry funded model for product stewardship, local governments have acknowledged that they have frequently incurred some management costs for existing product stewardship programs when materials end up in local waste streams. In light of this experience, local governments require reimbursement for the management of

any packaging and printed paper materials that end up in local government waste streams, which include garbage, public disposal facilities and illegal dumps. Compensation could be determined through standardized and industry funded waste audits that determine the amount of materials local governments handle. In addition, in accordance with the provincial product stewardship model, the producers must be responsible for all "hard" and "soft" program costs including collection, transportation, processing, and public outreach and education.

Recognizing that the producers may utilize either contracted services or existing local government infrastructure and collection programs, local governments have identified the need for fair compensation for their assistance in any packaging and printed paper product stewardship program. To date, it is unclear as to whether the producers will be providing compensation on a per household or service level basis, and on the level of compensation should local governments choose to participate in collection in the future. However, local governments maintain that compensation for participating in, or assisting with, the product stewardship program should be based on a local government's true operating costs (capital, operation, maintenance, contract administration, education and outreach, advertising and disposal costs).

Service Provision

The level of service to be provided under the proposed packaging and printed paper product stewardship program emerges as one of the biggest concerns and issues for local governments. Local governments continue to identify service provision challenges within existing provincial product stewardship programs, particularly within more rural and remote areas. The new PPP extended producer responsibility program should ensure that rural and remote areas receive an equitable level of service as their urban counterparts so that the additional costs of managing PPP materials are not incurred by local governments.

For those local governments that have established PPP programs in place, there is a concern that existing service levels and quality of service must be maintained or exceeded. Such local governments have invested significantly in the infrastructure of, and public education for, their PPP programs and have established community expectations around what constitutes quality service levels. As such, local governments require a seamless transition with the implementation of the new PPP program to prevent any disruptions to existing service levels, community expectations, and employment contracts. The latter is particularly important to several local governments, as there is concern that the new program could potentially impact existing employment contracts, both in terms timing with contract renewal, and with the failure to utilize existing union staff in providing the service. Moreover, there is a need for the producers to clarify how the PPP program will fit within existing solid waste management plans.

Local Government Role

All local governments will be directly impacted by the implementation of a new packaging and printed paper product stewardship program. However, to date, local governments are unclear as to role that local governments will play in managing PPP

materials, as well as the level of local government consultation in the design and implementation of the program. This lack of clarity extends to whether there will be potential partnerships with the producers as well as who has ownership over collected packaging and printed materials. In order to be successfully implemented, the new product stewardship program must provide options and opportunities for local governments to play an active role in managing PPP. This structural flexibility is required given local government's current administration of recycling and waste diversion programs, existing local government infrastructure, the linkage to solid waste management plans, and current community expectations around service levels.

6. RECOMMENDATIONS

That the following recommendations pertaining to the design and implementation of the packaging and printed paper product stewardship program be adopted by the UBCM membership.

That producers are responsible for, and have an obligation to, manage one hundred percent (100%) of the packaging and printed paper waste in British Columbia. This obligation includes an extension of the PPP program to the industrial, commercial and institutional (ICI) sector within three (3) years, as well as local government compensation for the management of PPP materials that end up in local government waste streams.

That the packaging and printed paper product stewardship program provides an equitable level of service between urban and rural areas, and that existing levels of service be maintained or exceeded for those local governments that have established PPP programs in place.

That local governments be given the right of first refusal for providing packaging and printed paper product stewardship services under the new PPP program. This option would minimize and/or prevent any disruption to existing services, employment contracts, and community expectations.

That the design and implementation of the PPP program seek to minimize the program's environmental impact by eliminating the need for landfilling and/or incineration of program materials.

That the supplementary recommendations contained within Appendix 1 be adopted as a tool for building local government knowledge and capacity to assist in local government discussions and negotiations with producers.

APPENDIX 1: RECOMMENDATIONS

Program Scope

That the PPP program be expanded within three years to cover the industrial, commercial and institutional (ICI) sector following the successful implementation of the program within the residential sector.

That the seventy-five percent (75%) target recovery rate identified in the Recycling Regulation apply to specific material categories as opposed to overall packaging composite.

That the seventy-five percent (75%) target recovery rate identified in the Recycling Regulation apply to each local government to ensure equivalent service levels between urban and rural areas.

That the PPP program seeks a recovery rate of eighty-five (85%) or higher, consistent with the principles adopted by the UBCM membership in the 2007 Environment Action Plan.

That the PPP program include the addition of milk containers to the deposit refund system.

That the PPP program apply to all areas that local governments are currently servicing.

Program Design

That producers develop market based incentives and/or design requirements to stimulate product redesign and re-use to diminish the potential for materials to be incinerated or landfilled.

That material specific targets and performance measures be developed by the producers and enforced by the Province.

That local governments be given meaningful consultation opportunities in the design of the program as well as ongoing consultative mechanisms during the implementation of the program.

That an enhanced dispute resolution process be incorporated into the program, whereby local governments have the right to receive compensation for impacted costs if producers are not providing adequate service levels that result in materials being sent to local landfills and/or incinerators.

That the product stewardship program incorporates flexible and scalable options for local government participation in the management of PPP materials.

That local governments be given the right of first refusal for providing packaging and printed paper product stewardship services under the new PPP product stewardship program.

Environmental Impact

That the design and implementation of the PPP program focus on seeking efficiencies within the collection, transportation and processing of materials to minimize the carbon footprint of the program.

That the product stewardship program include measures and incentives for redesigning packaging, which ensures that the program moves up the pollution prevention hierarchy by minimizing the landfilling and/or incineration of collected program materials.

Funding

That local government compensation for their assistance in, or management of, the product stewardship program be based on a local government's true operating costs.

That local government be compensated for the management of PPP materials that end up in local government waste streams, and that standardized and industry funded waste audits be conducted to help determine appropriate levels of compensation for such management.

That the product stewardship program be fully funded by industry, in which producers are responsible for all costs associated with the management of PPP materials including, but not limited to collection, transportation, processing, public outreach and education.

That local governments receive compensation for continued education and outreach activities following the implementation of the product stewardship program.

Service Provision

That rural and remote areas receive an equitable level of service as their urban counterparts under the PPP product stewardship program.

That existing service levels and quality of service be maintained or exceeded for those local governments that have established PPP programs in place.

That the implementation of the program seeks to provide a seamless transition for those local governments with established PPP programs, in order to minimize and/or prevent any disruptions to existing services, employment contracts, and community expectations.

Role of Local Government

That local governments be provided the option and opportunity to play an active role in the management of packaging and printed paper under the product stewardship program.

That the PPP program incorporate meaningful consultation opportunities in the design of the program as well as ongoing consultative mechanisms during the implementation of the program.

That local governments explore the creation of a local government product stewardship agency that would facilitate active engagement, and negotiation with, all product stewards on existing and new product stewardship programs.



Engineering Department

2012 September 04

Mr. Jared Wright, Senior Policy Analyst
 Union of British Columbia Municipalities
 Suite 60, 10551 Shellbridge Way
 Richmond, BC V6X 2W9

Dear Mr. Wright:

**SUBJECT: UBCM PACKAGING AND PRINTED PAPER WORKING GROUP
 POLICY PAPER**

Thank you for forwarding the policy paper on packaging and printed paper for staff review and comment in advance of consideration by the membership at the 2012 UBCM Convention.

The policy paper comprehensively identifies local government issues and concerns with the proposed product stewardship program for packaging and printed paper. However, in reviewing the key recommendations pertaining to the design and implementation of the PPP stewardship program, the following changes/additions are proposed for your consideration:

That producers are responsible for, and have an obligation to, manage one hundred percent (100%) of the packaging and printed paper waste in British Columbia. This obligation includes an extension of PPP programs to the industrial, commercial and institutional (ICI) sector by May 19, 2017, which is within three (3) years of the implementation of the program for the residential sector, as well as local government compensation for the management of PPP materials that end up in local government waste streams.

*That local governments be given the right of first refusal for providing **collection** services under the new PPP **EPR** programs. This option would minimize and/or prevent any disruption to existing services, employment and procured service contracts.*

That the design and implementation of PPP programs includes measures and incentives for redesigning packaging and printed paper, to ensure that the programs moves PPP up the pollution prevention hierarchy and eliminates the need for landfilling and/or incineration of program materials.

In addition, the following recommendations identified under *Program Scope, Program Design* and *Funding* in Appendix 1: Supplementary Recommendations of the policy paper be moved under key recommendations and read as follows:

That the minimum seventy-five percent (75%) target recovery rate identified in the Recycling Regulation apply to specific material categories as opposed to overall packaging composite, and that the rate apply to each local government to ensure equivalent performances between urban and rural areas. The programs should also commit to a schedule of continuously improving recovery rates such that it achieves 85% or higher within a specified time period.

That an enhanced dispute resolution process be incorporated into the programs whereby local governments have the right to receive compensation for impacted costs if producers are not providing adequate service levels that result in materials being sent to local landfills and/or incinerators.

That where local governments choose to provide recycling collection services to stewardship organizations that the local governments be compensated for those services.

Once again, thank you for providing an opportunity to comment on the policy paper. For any clarifications, please contact Dipak Dattani, Assistant Director Engineering, Environmental Protection at 604-294-7771.

Yours truly,



Barry Davis, P. Eng.
Acting Director Engineering

Copied to: City Manager

DD:dd

