

STEWARDSHIP AGENCIES OF BC

ACTION PLAN TO ENHANCE EXTENDED
PRODUCER RESPONSIBILITY IN BC



**Stewardship Agencies
of British Columbia**

2013

Action Plan

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LETTER FROM THE CHAIR

Extended Producer Responsibility (EPR) is an environmental management strategy guided by the principle that whoever designs, produces, sells, or uses a product takes responsibility for minimizing that product's environmental impact at the end of its life. The idea behind EPR is sensible: the businesses that make products, and the users of these products, should pay for recovering and recycling materials.

In British Columbia (B.C.), industry's response to EPR is product stewardship. The product stewardship model is comprised of several key players – manufacturers, retailers, governments and consumers – working together, ultimately with the goal of diverting products from landfills and ensuring they are responsibly recycled at their end-of-life.

The Stewardship Agencies of British Columbia (SABC) members are fortunate in having a flexible, performance-based regulatory framework within which to operate. This B.C. model was recognized in 2012 with Canada's only 'A' grade by the not-for-profit group EPR Canada, and was tied for top spot in their 2013 report. The Ministry of Environment, as the regulator, plays a key role in ensuring that approved programs are moving in step with the principles that guide the B.C. government's EPR approach: producer/user responsibility; level playing field; results-based; and transparency and accountability.

The working groups that developed this Action Plan were carefully selected to reflect these principles. The working groups, comprised of individuals from SABC member agencies and led by Ministry of Environment staff, identified specific actions and accountabilities to be undertaken as the EPR model evolves that will provide a framework for the continued success of stewardship programs in the province. The outcomes of working groups, that is, the recommendations in this Action Plan, are proposed solutions put forward by SABC members. The Ministry of Environment may make policy recommendations based on this Action Plan; any policy decisions will be made by the BC government and in accordance with authorities delegated under the *Environmental Management Act*.

Industry has been supportive of the B.C. EPR model and is committed to ensuring the results-based approach to product and materials management is successful. Moving forward, we will continue to work closely with local governments, Regional Districts, retailers, producers and the Ministry of Environment to enhance product stewardship while maintaining an efficient system and consumer-friendly approach.

Craig Wisehart
Chair, SABC

EXECUTIVE SUMMARY

In October 2004, the Province of British Columbia enacted the Recycling Regulation (B.C. Reg. 449/2004), under authority of the *Environmental Management Act*. The Recycling Regulation (the Regulation) requires producers of prescribed products to take Extended Producer Responsibility (EPR) for the life cycle management of their products, including collection and recycling, so that products are diverted from landfills and disposed of in an environmentally friendly way at their end-of-life.

The intention of EPR strategy is to promote the integration of environmental costs associated with goods throughout their life cycles into the market price of the products, thereby motivating producers to make and sell products that are more durable, contain fewer toxins and never become waste at the end of their life.

The Ministry of Environment (the Ministry) and producers have enjoyed considerable success with EPR under the Regulation. Both industry and local government support the regulatory model and the stewardship programs generate environmental and economic benefits to British Columbia (B.C.).

The B.C. Government has developed four key principles that provide the strategic context for EPR programs:

1. **Producer/User Responsibility** - Responsibility for waste management is shifted from general taxpayers to producers and users. Responsibility is not shifted to other levels of government without consent.
2. **Level Playing Field** - All brand-owners for a particular product category are subject to the same stewardship responsibilities (including historical waste). All consumers have reasonable access to product collection facilities.
3. **Results-based** - Programs focus on results and provide brand owners with flexibility with minimum government involvement. Programs are tailored for individual products and encourage continued innovation by producers to minimize environmental impacts during all stages of the product lifecycle, from product design to end-of-life management.
4. **Transparency and Accountability** – The program development process is open and provides all stakeholders the opportunity for input. Industry is accountable to both government and consumers for environmental outcomes and allocation of revenue from fees/levies.

Over the next few years the scope of regulated products will grow significantly. This growth will bring with it significant increases in both the scale of EPR programs and the number of producers with responsibilities under the Regulation. As a result, this expansion will increase the volume of work required of Ministry staff who review plans, respond to correspondence from the public and conduct compliance promotion, verification and enforcement.

The growth of product stewardship also generates challenges including an increase in consumer confusion and impacts to local government. Product stewardship in the province has always existed in a state of evolution. The model must continue to evolve, with all stakeholders addressing the challenges encountered, to ensure future success.

Through a series of working groups, members of the Stewardship Agencies of British Columbia (SABC), facilitated by the Ministry, have brought forward solutions to existing, and some of the anticipated, challenges associated with EPR within the province. The working groups addressed:

1. **Program performance,**
2. **Collection and operational excellence,**
3. **Education and awareness and**
4. **Local government engagement and relationship building.**

Ministry staff may make policy recommendations based on working group outcomes, however, decisions will be made by government and in accordance with authorities delegated under the *Environmental Management Act*.

THE EPR ACTION PLAN

Overview of Product Stewardship in British Columbia

In October 2004, the Province of British Columbia enacted the Recycling Regulation (B.C. Reg. 449/2004), under authority of the *Environmental Management Act*. The Recycling Regulation (the Regulation) requires producers of prescribed products to take Extended Producer Responsibility (EPR) for the life cycle management of their products, including collection and recycling, so that products are diverted from landfills and disposed of in an environmentally friendly way at their end of life.

The intention of EPR strategy is to promote the integration of environmental costs associated with goods throughout their life cycles into the market price of the products, thereby motivating producers to make and sell products that are more durable, contain few toxins and never become waste at the end of their life.

A product stewardship agency may be appointed by a producer, to act on its behalf, to undertake duties that include, but are not limited to, preparing a stewardship plan, implementing and managing a program and reporting on progress. The governance structure, operational systems, and fee structures of an agency are determined by the producers as members of the agency.

The Ministry of Environment (the Ministry) and producers have enjoyed considerable success with EPR under the Regulation. Both industry and local government support the regulatory model and the stewardship programs generate environmental and economic benefits to British Columbia (B.C.).

Over the last few years, stewardship agencies began working together in a more unified fashion where there were issues that were of common interest to all B.C. stewards; they did so as the Stewardship Agencies of British Columbia (SABC). Members of SABC include:

- B.C. Used Oil Management Association
- Brewers Distributor Limited
- Call2Recycle
- Canadian Battery Association
- Electronic Products Recycling Association
- ElectroRecycle Small Appliance Recycling Program
- Encorp Pacific (Canada)
- Heating, Refrigeration, and Air Conditioning Institute of Canada
- LightRecycle
- Major Appliance Recycling Roundtable
- Multi Material BC
- Post-Consumer Pharmaceutical Stewardship Association
- Outdoor Power Equipment Institute of Canada
- Product Care
- Canadian Wireless Telecommunications Association
- Switch the 'Stat
- Tire Stewardship B.C.

Over the next few years the scope of regulated products will grow to meet the performance commitments for product stewardship outlined in the Ministry 2012/13 – 2014/15 Service Plan. This growth will bring with it an

increase in both the scale of EPR programs in operation and the number of producers with responsibilities under the Regulation.

This expansion increases the volume of work required of ministry staff in reviewing plans, responding to correspondence from the public and conducting compliance promotion, verification and enforcement. The growth of product stewardship also generates challenges including a potential increase in consumer confusion and impacts to local government. Product stewardship in B.C. has always existed in a state of evolution. The model must continue to evolve, with all stakeholders addressing the challenges encountered, to ensure its future success.

B.C. is a recognized leader in the development and implementation of EPR, with more programs than any other jurisdiction in the world. The B.C. Government has developed four key principles that provide the strategic context for EPR programs:

1. **Producer/User Responsibility** - Responsibility for waste management is shifted from general taxpayers to producers and users. Responsibility is not shifted to other levels of government without consent.
2. **Level Playing Field** - All brand-owners for a particular product category are subject to the same stewardship responsibilities (including historical waste). All consumers have reasonable access to product collection facilities.
3. **Results-based** - Programs focus on results and provide brand owners with flexibility with minimum government involvement. Programs are tailored for individual products and encourage continued innovation by producers to minimize environmental impacts during all stages of the product lifecycle, from product design to end-of-life management.
4. **Transparency and Accountability** – The program development process is open and provides the opportunity for input to all stakeholders. Industry is accountable to both government and consumers for environmental outcomes and allocation of revenue from fees/levies.

Industry has been supportive of the B.C. model, and has a vested interest in ensuring this results-based approach to product and materials management is successful.

Purpose of the Action Plan

With the recent expansion of EPR programs in B.C., growing pains are being experienced by all stakeholders, particularly stewardship agencies, local governments and the Ministry. The Action Plan will address the EPR program challenges in a manner consistent with the key program principles noted above.

Development of the Action Plan

Process and Parties Involved

The Ministry identified the following four areas of concern that need to be addressed in order to ensure the success of B.C.'s EPR programs and regulatory approach:

1. Program performance,
2. Collection and operational excellence,
3. Education and awareness and
4. Local government engagement and relationship building.

The Ministry engaged with the stewards through SABC and our working groups. These groups were composed of SABC member representatives and were facilitated by Ministry staff. These working groups were established to develop and recommend solutions and actions to the above noted areas of concern. All stewardship agencies had an opportunity to participate; however, the size of the working groups was designed to support project efficiency. Each working group included a cross-section of program and product types.

Working group leads ensured that outcome-focused records of discussion were agreed to by group members. The working groups met established targets and timelines, and outcomes were circulated to all stewardship agencies.

The recommendations in this Action Plan are SABC member representatives' proposed solutions to improving EPR in the province. The Ministry has signaled to SABC that they will be considering policy recommendations to address the outstanding EPR issues/pressures not covered by the SABC action plan.

1. PROGRAM PERFORMANCE

Situational Analysis

The Ministry identified the need to: improve compliance and enforcement, and foster continuous improvement and efficiency across stewardship programs. This strategy ensures that approved programs continue to effectively meet their obligations as outlined in their respective Stewardship Plans, as per the Regulation.

Working Group Terms of Reference

Activities in three key areas were identified.

1. Third Party Assurance - The third party assurance requirement on non-financial information regarding collection sites, recovery rate data and material management (end fate).
2. Consistent Annual Reporting - Provide a template annual report for approved programs to adopt to promote consistent reporting among stewards.
3. Performance Incentives (Dispute Resolution) - If programs underperform and leave products/materials to be managed by local governments or other producers there should be a mechanism for cost remediation.

SABC Recommendations

1. **Third Party Assurance: require stewardship organizations to undertake Third Party Assurance for non-financial information (collection sites, recovery rate data and material management (end fate)).**

Stewardship agencies have adopted Third Party Assurance requirements as outlined in a letter from the Ministry to stewardship agencies:

- Stewardship agencies agree to conduct pre-audits of material management and report to the Ministry on progress and these pre-audits, with an Audit Assurance report including product management due **July 1, 2015 (reporting year 2014)**; or
 - Stewardship agencies agree to provide an Audit Assurance report including product management due **July 1, 2014 (reporting year 2013)**. (Progress reports are not required.)
2. **Consistent Annual Reporting: require stewardship organizations to use a template annual report format to promote consistent reporting.**
 - Through the SABC, stewardship agencies have developed and adopted an Annual Reporting Template¹ that summarizes the program performance (under Section 8 annual reporting requirements of the Recycling Regulation).
 - SABC has recommended to its members that they use the Annual Reporting Template to report on their programs in a consistent manner and in an accessible format for the Ministry, the public and interest groups.
 3. **Performance Incentives (Dispute Resolution): require stewardship organizations to develop a mechanism to deal with products/materials that are inadvertently managed by local governments or other producers.**

¹ Refer to Appendix A.

- Through the SABC, stewardship agencies have developed a framework on Performance Incentives (Dispute Resolution).²
- It is recommended that a committee be set up specifically to address the matter of program-to-program 'free riding'.

² Other elements of Performance Incentives are covered in the Working Group 2 & 4 sections of this document.

2. COLLECTION & OPERATIONAL EXCELLENCE

Situational Analysis

The Ministry identified a need to improve service levels in terms of access to collection facilities for stewarded products to ensure consumers have convenient access to collection points. Convenient access to collection will facilitate recycling of stewarded products throughout the province. Currently, 97% or more of the province's population has access to a collection facility under the SABC standard (September, 2012).

Working Group Terms of Reference

There is a need to provide the consumer with a good experience and a high level of satisfaction when dealing with the EPR program. It must be simple, convenient and pleasant for consumers to recycle. They must have convenient access to depots or collection facilities and a positive experience with the program interface when they return products for recycling. Use of super depots, also known as multi-program free-standing collection facilities,³ are one option to support this. A minimum remote or rural accessibility target should also be explored. Specific criteria or expectations from local government may assist in establishing performance standards.

SABC Recommendations

1. Develop a policy on multi-program collection facilities.

Policy Objective: Multi-Program Free-Standing, Collection Facility

- Stewardship agencies seek to increase consumer convenience for recycling by providing consumers with multi-program collection facilities among programs using depots, where practical.
- Multi-program depots will be located in or close to locations with high population densities, providing greater consumer accessibility and affording higher traffic for the depots. As such, the focus for locations of multi-program depots will be based on serving larger consumer populations where large amounts of material for diversion can be collected.
- Not all materials that are part of stewardship programs can safely be collected in the same location. Similarly, due to a variety of environmental and zoning regulations, it may not be possible to collect some materials that are considered hazardous waste in certain retail-situated depots..
- SABC has compiled a listing of all multi-program depots and further commits to provide Ministry officials, as well as municipal representatives, with a plan to address existing gaps.
- As more retail locations look to expand the number and types of material they collect from the consumer, the term multi-program collection facility may be expanded to include those retail locations that accept materials from multiple stewardship programs.
- Additional stewardship program materials may also be included in multi-program collection facilities as new programs are implemented, at the request of the stewardship agency.

³ A multi-program free-standing collection facility (Multi-Program Depot) is any collection facility location that is approved to accept materials from the public from more than two stewardship programs. Identification of Multi-Program Depot is tiered based on the number of stewardship program materials that are accepted at the particular location (often dependent on specific criteria for that depot, such as existing depot size, location, zoning, contractual territories or other internal program criteria).

- Each approved stewardship agency will retain final decision on whether or not their program product is approved as part of a multi-program collection facility.
- Stewardship agencies will explore potential depot partnerships with municipalities where they comply with the policy and operational objectives outlined in the Action Plan (including economic requirements) and the business models of SABC agencies.

2. Establish a common standard on accessibility for both rural and urban areas.

Accessibility Standard for approved product stewardship plans:

- For rural communities with a population of 4000 or more, a 45 minute drive to a collection facility.
- For urban communities with a population of 4000 or more, a 30 minute drive to a collection facility.

For purposes of the depot service standard, rural communities are defined as cities, towns, resort municipalities and district municipalities with a population of between 4,000 and 29,999 outside the Metro Vancouver and Capital Regional Districts. Urban communities are defined as cities, district municipalities and towns within the Metro Vancouver and Capital Regional Districts with a population of 4,000 or more and cities and district municipalities with a population of 30,000 or more in the remainder of the province.

3. Increase depot convenience in rural service areas.

Network Enhancement:

Regularly Scheduled Collection Facility (Underserved Areas)

- Stewardship agencies that utilize depots for collection will establish where possible “regularly scheduled collection facilities” at a third party location. An initial list of potential locations has been compiled by SABC, found in Appendix C, and agencies are coordinating efforts to operate jointly in as many locations as practical.
- Locations have to be staffed, with security and appropriate space for consumer access.
- The Ministry has confirmed that regularly scheduled collection facilities may replace current one-off collection event commitments in stewardship plans and this will be noted in the Annual Report, performance against targets.

Return-to-Retail Locations

- Stewardship agencies will actively expand their current return-to-retail partnerships as a second layer of accessibility as appropriate.

4. Accommodate additional programs in free-standing collection.

As referenced in Section 3 above, the working group has undertaken an exploration of existing free-standing collection facilities, which could expand to accommodate other program products. In this exploration the following items have been taken into consideration:

- Necessary product handling process requirements to meet end fate audit reporting requirements,
- Health and safety issues related to the handling of specific product categories,
- Current product category weight ratios and
- Material available for collection in specific territories.

5. Clarify steward compensation to Regional Districts and local government.

Compensation to Local Government

- Municipally-run collection facilities may participate in a stewardship program and receive the same compensation as provided to other program collection facilities.
- Approved stewardship programs pay market rates for collection based on each program's own criteria for the establishment of a financially viable free-standing collection facility.
- Funding public infrastructure is not the mandate of stewardship programs.
- The additional cost of funding a more expensive municipal collection facility would dilute the material collection at the for-profit free-standing collection facility and thus would make them more inefficient and would increase costs.
- As the regulated stewards, each program has a fiduciary responsibility to manage funds and to maximize diversion costs effectively.

6. Further initiatives:

- Develop an inventory of collection facilities (identify the number of total drop-off locations for all programs with a regional district breakdown).
- Amend the definition of depot to include single- or multi-program, and/or independent and free-standing collection facilities, which include not-for-profit organizations and community groups.
- Recognize the critical role of return-to-retail locations for certain stewardship programs, and that such locations are part of the inventory of collection facilities but are limited to certain product categories, taking into account the economic, regulatory, accessibility, operational and safety considerations of the facility.
- Investigate a consumer-facing program gap analysis (see EPRA GIS Study, Fig. 2 in Appendix C as an example) of accessibility.
- For those using depots, demonstrate to regional districts, the Ministry and other stakeholders that depot accessibility standards are being met, as appropriate, including:
 - Map of current free-standing collection facilities locations by program, including free-standing multi program collection facilities where applicable,
 - Standards of accessibility and
 - Percent conformance to the standard as per the timeline and methodology identified above.

3. EDUCATION & AWARENESS

Situational Analysis

There exists a need to improve education and awareness of stewardship programs in B.C. in order for citizens to be well situated to take advantage of existing and pending stewardship programs. This strategy will ensure that consumers are aware of the recycling programs available so stewarded products are diverted from landfills in an environmentally responsible way.

Working Group Terms of Reference

There exists a need to improve public consultations and engagement in establishing (and renewing) stewardship plans; a need to educate B.C. citizens so they know about and use the recycling programs available, and a need to enhance consultation and communication between stewardship agencies, producers and within the supply chain.

Consumers need to be made aware of which products they can return for reuse or recycling and how to do this.

SABC Recommendations

Recognizing that public awareness levels can be improved to facilitate the use of stewardship programs, the following five initiatives and tactics are proposed to improve education and awareness. Further clarification is provided below for each of these five initiatives and tactics to provide a better understanding of what is meant, and to alleviate concerns that these initiatives will over-ride or negate initiatives undertaken by the individual stewardship agencies.

1. Consumer Facing.

Stewardship agencies working as part of SABC currently support a common website (BCstewards.com) which includes a searchable common collection facility locator and a hotline for answering consumer questions.

Recycle BC was chosen as the common public mark to be used as the single public-facing “brand” that is easily recognizable by all British Columbians and synonymous with recycling excellence. SABC has begun the process of registering this mark. The current website will be rebranded as Recycle BC and will provide access to the common location finder, hotline number and flipbook application for “BC’s Recycling Handbook.” Those requiring additional information about individual programs will be able to access stewardship agency websites via links from Recycle BC.

In addition, there are a number of means to use the mark to enhance public awareness of BC residents’ recycling opportunities:

- Rename bcstewards.com site to Recycle BC (with all available derivations);
- Use the mark (in addition to but not in place of an agency’s consumer/corporate brand identifiers) on individual agency information vehicles such as web sites, trade/consumer signage/brochures, print media and public event marketing materials;
- Adopt the mark to identify our location finder app, now known as Recyclepedia; and
- Attach the mark to all correspondence from and on behalf of SABC.

While the Recycle BC mark will be public-facing through these various uses, it is not practical for the mark to act as an identifier of existing or new collection facilities.

2. Consumer Response Services.

Stewardship agencies have contracted RCBC for delivery of certain consumer response services, including the hotline and the "Recyclepedia;" RCBC will answer the consumer questions about what is recyclable and where the closest place is to drop off their recyclables.

3. Joint Public Awareness Initiatives.

Through SABC, stewardship agencies will plan and implement joint public awareness initiatives for SABC drop-off collection events and ambassador program community events (handing out the Recycling Handbook and promote other joint SABC initiatives). In addition, all interested SABC member agencies will promote common or shared tools. In order to avoid consumer confusion, it will be important for local governments to point to the initiatives being developed by the stewardship agencies instead of developing their own.

4. Promotion of Common Collection Facility Network.

A number of existing stewardship agencies already share a common collection network. This will be enhanced as new stewards develop their collection network. Programs that use a common collection facility network may plan joint public awareness campaigns to inform the public of the common collection network.

As noted above, it is not practical to rebrand existing collection facilities with the new Recycle BC mark.

5. Benchmark Consumer Awareness Levels.

Stewardship agencies have identified concerns with the Ministry's suggested 85% consumer awareness target across all programs. Stewardship programs are at different levels of maturity and public awareness; in addition, the material collected by each program may impact the level of awareness for that program.

Through SABC, stewardship agencies will develop and fund jointly a Benchmark Consumer Awareness study for 2013. Questions for the survey will be built upon the 2009 Ministry survey, which gauged:

- The survey participant's level of awareness of stewardship programs,
- Their participation,
- The perceived level of convenience,
- Understanding of who to contact for recycling information and
- Knowledge of how to find the nearest collection facility.

Specific questions developed from the joint benchmark study may also be incorporated into individual SABC member program awareness studies to continually measure and report on results attained. For those who do not conduct annual benchmark studies an Omnibus can be used, where deemed appropriate, to provide results and measurements.

Following the 2013 Benchmark Study, SABC proposes that further Benchmark Consumer Awareness studies be undertaken every 3 years.

4. LOCAL GOVERNMENT RELATIONS

Situational Analysis

There exists a need to improve local government relations in program operations, and to address or clarify issues relating to ownership of stewarded products, particularly as it applies to the costs of managing products that may enter municipal landfills. This strategy aims to ensure that all stakeholders work together in support of EPR.

Working Group Terms of Reference

Stewardship agencies need to engage with local governments and ensure an ongoing dialogue. A stronger and more enhanced collaborative relationship between producers, local governments and the Ministry is necessary.

SABC Recommendations

The group is proposing three items to address local government relations:

1. Two-tiered approach to engagement.

SABC recommends a two-tiered approach to local government engagement which would involve (a) working with a Union of B.C. Municipalities (UBCM) group to address stewardship issues and (b) facilitating direct dialogue with local government on specific regional district and municipal issues.

On behalf of stewardship agencies, SABC is currently working with the UBCM to establish an interface group to work on municipal and regional issues. This group would be comprised of senior staff or elected officials with the ability to speak for and make decisions on behalf of their representative groups. Representation will reflect rural districts and Metro Vancouver.

The purpose of the UBCM group will be to:

- Be the primary group to discuss and negotiate high level standards, such as accessibility;
- Serve as the primary channel for regional district and municipality issues, addressing and potentially resolving issues directly between the SABC and local parties instead of moving these issues to the Ministry; and
- Serve as a channel for SABC to raise issues concerning zoning policies within specific municipalities that create barriers to opening up collection sites and to develop actions to overcome these barriers.

2. Commitment to reaching out to rural regional districts.

In addition to the steps outlined in item 1, SABC recommends outreach to rural regional districts, a proactive step stewards could take that would be effective in dealing with specific local issues that are not necessarily relevant to other areas of the province. SABC commits to having a member meet with two rural RD boards per year as well as consulting as needed on specific issues.

3. Managing costs of stewarded products in municipal landfills.

Issues relating to ownership of stewarded products, specifically the costs to manage products that end up in municipal landfills, should be clarified. At a high level it does not appear reasonable to assign ownership of the products to stewardship agencies. Many of the stewarded products have commercially viable take-back streams that operate outside of the approved programs' networks. All programs have collection targets that they have committed to meeting and in order to meet those targets, agencies take back what they can reasonably control. The Regulation was not intended to (nor could it reasonably) include all of the products in the province.

As such, SABC proposes:

- I. **A standardized waste composition study to help establish the scope of stewarded products in landfills.** SABC members have reviewed the waste composition study previously commissioned by the Ministry and are working with the contractor (TRI) on the changes needed to allow one study to serve both purposes. A draft of the waste audit is found in Appendix D.
- II. **Landfill bans where appropriate coverage for recycling is available.** Where bans are enacted and enforced, costs of products entering the landfill should already be paid for by the fines levied on those responsible for introducing the banned products into the landfill. Paying the regional districts and municipalities for the products that are allowed into landfills discourages recycling and facilitates consumers not properly disposing of the material through established systems.
- III. **Compensation for local government landfills.** SABC agencies generally compensate local government at their current market rate for uncontaminated durable and semi-durable goods that are collected, stored and packaged separately from the waste stream, according to the steward's specifications. In product areas that are highly susceptible to contamination this would not be applicable, for example with printed paper and packaging and refillable bottles.
- IV. **Discussing issues with representatives of local government through the UBCM joint advisory committee once established.**

[Stewardship Agency]

Annual Report to the Director

[20xx Calendar Year]

Submitted to: David Ranson
Director, Waste Management
PO Box 9341, STN PROV GOVT
Victoria, B.C. V8W 9M1

Prepared by: [Steward Contact Name & Title]
[Stewardship Agency/Company]
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[Phone #]

[Date]

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<Agency Name> [20xx] Report to Director, Waste Management

1. Executive Summary

The table below should concisely summarize program performance for the section 8 annual reporting requirements such that ministry staff and the public can easily understand whether reporting requirements and stewardship plan targets have been met.

Products within plan	
Program website	

Recycling Regulation Reference	Topic	Summary (5-bullet maximum)
Part 2, section 8(2)(a)	Public Education Materials and Strategies	
Part 2, section 8(2)(b)	Collection System and Facilities	
Part 2, section 8(2)(c)	Product Environmental Impact Reduction, Reusability and Recyclability	
Part 2, section 8(2)(d)	Pollution Prevention Hierarchy and Product / Component Management	
Part 2, section 8(2)(e)	Product Sold and Collected and Recovery Rate	
Part 2, section 8(2)(e.1)		See Section 7 for breakdown per regional district
Part 2, section 8(2)(f)	Summary of Deposits, Refunds, Revenues and Expenses	<i>[Provide report reference to the independently audited financial statements]</i>

Comparison of Key Performance Targets		
Part 2 section 8(2)(g); See full list of targets in Plan Performance		
Priority Stewardship Plan Targets (as agreed with ministry file lead)	Performance	Strategies for Improvement
1.		<i>[N/A if target met]</i>
2.		
3.		
4.		

Comparison of Key Performance Targets		
Part 2 section 8(2)(g); See full list of targets in Plan Performance		
Priority Stewardship Plan Targets (as agreed with ministry file lead)	Performance	Strategies for Improvement
5.		

2. Program Outline

Provide a brief (1 page) overview of the stewardship agency/company and their members [website link], program inclusions, collection approach and any other high level information relative to the annual report e.g. studies completed, new targets set, consultations or surveys conducted.

3. Public Education Materials and Strategies

Provide a brief overview of the key materials and strategies used to promote awareness of the program. Identify the various types of outreach (i.e. face to face, social media, traditional media, etc.) utilized.

Reference: Recycling Regulation – Part 2, section 8(2)

(a) a description of educational materials and educational strategies the producer uses for the purposes of this Part

4. Collection System and Facilities

Provide a brief overview of the way in which the stewardship agency collects the products from the consumer (i.e. depots, return to retailer, collection events, etc.). If available, list the number of collection facilities in each regional district and identify changes in the number, location, and method of collection from the previous year to the present year. If the list is extensive, consider including a summary and attaching a separate document or URL.

Reference: Recycling Regulation – Part 2, section 8(2)

(b) the location of its collection facilities, and any changes in the number and location of collection facilities from the previous report;

5. Product Environmental Impact Reduction, Reusability and Recyclability

Identify ways in which producers or the agency contributes to the reduction of environmental impact. For example, utilization of certified processors, R&D performed to improve recyclability / reuse of the product or components, examples of design for environment mechanisms used by producer members of the agency, reduction of greenhouse gas emissions. The producer may also wish to report on the status of any studies being undertaken to assist with the measurement of environmental impacts. Identifying successes is encouraged.

Reference: Recycling Regulation – Part 2, section 8(2)

(c) efforts taken by or on behalf of the producer to reduce environmental impacts throughout the product life cycle and to increase reusability or recyclability at the end of the life cycle;

6. Pollution Prevention Hierarchy and Product / Component Management

Provide a brief overview of the way in which the collected product is managed and how those outcomes relate to the pollution prevention hierarchy. Provide breakdowns by weight or percentage of product managed at each level. Please also refer to third party assurance FAQs (original version dated November 22, 2012), distributed to stewardship programs by the Ministry.

Reference: Recycling Regulation – Part 2, section 8(2)

(d) a description of how the recovered product was managed in accordance with the pollution prevention hierarchy;

7. Product Sold and Collected and Recovery Rate

Provide a summary of the total amount of product sold, collection volumes and, if applicable, recovery rates achieved by the program based on the approach included in the approved program plan. Also provide a summary of total product recovered by regional district.

Reference: Recycling Regulation – Part 2, section 8(2)

- (e) the total amount of the producer's product sold and collected and, if applicable, the producer's recovery rate;
- (e.1) effective for a report required on or before July 1, 2013 and for every report required under subsection (1) after that date, the total amount of the producer's product recovered in each regional district;

8. Summary of Deposits, Refunds, Revenues and Expenditures

For those programs that charge deposits only:

Include a summary of deposits received and refunds paid in British Columbia by the producers (by plan if agency manages more than one plan). Attach a copy of the current year's independently audited financial statements as an appendix.

For those programs that charge a visible ecofee only:

Include a summary of fees / rates charged by the agency and provide a summary of total revenues and expenses in British Columbia (by plan if agency manages more than one plan). Attach a copy of the current year's independently audited financial statements as an appendix.

Reference: Recycling Regulation – Part 2, Section 8(2)

- (f) independently audited financial statements detailing
 - (i) all deposits received and refunds paid by the producers covered by the approved plan, and
 - (ii) revenues and expenditures for any fees associated with the approved plan that are charged separately and identified on the consumer receipt of sale;

9. Plan Performance

Using the table below, provide a brief overview of the performance of the plan for the current year compared to the stated performance requirements and targets specified in the approved plan. If no specific targets have been set (e.g. new plans in first year of operation), specify baseline results, significant achievements and identify when targets will be set.

Reference: Recycling Regulation – Part 2, section 8(2)

- (g) a comparison of the approved plan's performance for the year with the performance requirements and targets in this regulation and the approved plan

Plan Target	20xx Results	Strategies for Improvement
1.	<i>[Result and supporting detail if appropriate and/or rationalization if target not met]</i>	<i>[N/A if target met]</i>
2.		
3.		
4.		
5.		

Appendices / Additional Information and Third Party Assurance

Attach any additional documentation that is required.

Include:

- *Financial Statements (if applicable),*
- *Third Party Assurance Statement for Non-Financial Information, and*
- *Other items related to plan commitments such as greenhouse gas or other studies, consumer awareness surveys, detailed information on depot locations, etc.*

Reference: Recycling Regulation – Part 2, section 8(2)

Including section 8(2)(h), any other information specified by the director

APPENDIX B (WORKING GROUP 1)

PROGRAM PERFORMANCE FRAMEWORK

Potential Dispute by a Party (Party to be defined)

Actions to be taken: Results discussed with the Stewardship Agency (“Steward”)

Results

Meets Performance Criteria

Actions to be taken: *No further Action*

Does not meet Performance Criteria



Acceptable deficiency plan in place with time frames

Action to be taken: *Continued monitoring until plan is complete*



Action to be taken:

1. Ministry will conduct an assessment and issue a letter informing the Steward they do not meet the Performance Criteria. The Steward will respond within xx days with an action plan on how the deficiencies are going to be remediated.
2. If an acceptable plan has not been submitted to the Ministry within xx days, a letter outlining all deficiencies along with expected completion dates will be sent to the Steward.
3. The Steward may request a second assessment. If a written request were received, the Ministry would complete another assessment of the Steward. The written request notice must be received within xx days after the initial assessment was completed. The Ministry will work with the Steward in an attempt to reach a satisfactory deficiency correction plan. The Steward, may request Stewardship Agencies of B.C. (“SABC”) to assist in the development of this plan.
4. If a second assessment results in deficiencies still identified, the Ministry will issue a letter informing the Steward that it is deficient in carrying out its obligation under Enhancing EPR Project Plan and/or its Stewardship Plan.
5. If the deficiency plan is still not received written correspondence from the Ministry will be sent informing the Steward is deficient in carrying out its Stewardship Plan.

6. In the event that no communication of corrective action is undertaken by the Steward and received by Ministry, it will be deemed that the Steward is deficient in carrying out its obligation under its Stewardship Plan. Further, the Ministry may require that the Steward notify each producer for whom the agency acts.

Results of 2012 Collection Events:

EPRA (2012)

- 21 events
- Collection tonnage ranged from 623 kg to 4.5 tonnes
- Cost per tonne ranged from \$ 382 per tonne to \$ 5482 per tonne – average of \$1448 a tonne.
- Promotion and organization implemented by EPRA

CESA (2012)

- 11 events
- 5 out of the 11 events did not even collect a pallet or mega bag full (all 5 collected <12 pieces)
- Tonnage ranged from 8kg to a high of 372kg
- Cost per tonne ranges from \$972 to \$107,500 – average of \$5,880 a tonne.

PCA (2011)

- 26 events
- Only 9 out of the 26 events collected any pesticides/solvents/gasoline, even though collection services for those products were provided at all 26 events
- Number of collection containers ranged from <1 to a high of 62
- Promotion and organization implemented by local government

TIRE STEWARDSHIP B.C.

- 9 events
- Tires collected ranged from 148 to 1047
- Events include collection of program and non program tires
- Promotion and organization in partnership with tire retailers and local government

Summary of Collection Events:

- Collection events are not cost effective.
- Collection volumes are lower than a traditional depot.
- Where local government was responsible for promotion and organization, where they believed this was conducive to local needs, there was little to no demand for service as demonstrated by low volumes

APPENDIX D (WORKING GROUP 4)

SABC and Regional Districts Waste Audit Proposal

1.0 Introduction

SABC is a not-for-profit organization established by stewardship agencies in British Columbia with plans approved by the B.C. Ministry of Environment (MINISTRY OF ENVIRONMENT) to operate designated programs within the province under the Recycling Regulation. SABC wishes to formalize a working partnership with regional districts to conduct detailed waste audits to determine the makeup of the waste stream in five regions including Metro Vancouver, the CRD, Interior B.C., and Northern B.C. which represent the full spectrum of regional districts in the province.

The reports derived from these audits will be analyzed and used as one of many tools by SABC members to establish the effectiveness of their programs in accordance with the requirements of the Recycling Regulation. The resulting information will assist the partners in achieving the long term goal of zero waste.

2.0 Waste Audits

Waste audits, as a monitoring and analytical tool, can effectively and systematically characterize waste streams received at landfill sites. Data compiled during these audits can provide both SABC members and municipal recycling coordinators with valuable information and insight. “Waste audits” or “waste characterization studies” have been utilized by municipal recycling coordinators to assess their successes and/or failures in properly diverting waste from the residential and the industrial, commercial and institutional (ICI) sectors in compliance with their waste management plans and Part 3 of the Environmental Management Act for many years.

Waste audits are used by the stewardship programs as a tool to monitor the effectiveness of their efforts to divert regulated materials from the waste stream.

3.0 Objective

SABC is seeking to establish a partnership agreement for participating in scheduled waste audits performed in five regional districts.

SABC proposes to work with the organization representing municipalities and regional districts to develop a generic guide or template, which details the methodology to be utilized by the jointly selected regional districts when conducting waste audits (the “Guide”). The Guide will enable the partner regional districts to conduct similar audits in the same manner. SABC proposes using the most recent CRD waste composition study as the starting point for the development of the Guide.

The Guide will include detailed sampling protocols, which will provide:

1. Separate profiles of residential waste, single and multi-family, and industrial, commercial and institutional (ICI) waste for each of the participating steward’s streams as identified by each, as well as the general waste stream.
2. Overall confidence intervals that are the same for the residential and ICI streams at each of the five municipal solid waste disposal sites
3. A composite profile of all (residential and ICI) waste received at each waste management region
4. Specifics regarding sampling origin, frequency, weight, general methodology,
5. Categorization, etc. are provided in the Scope of Work below

Scope of Work

4.0 Development of the Guide

The Guide will document all procedures, processes, protocols and forms utilized in conducting waste audits for this project in a manual format. The Guide will provide a clear framework for replicating the methodology for all future waste audits.

Subsequent waste audits reports will include, but not be limited to:

- Table of Contents;
- List of Appendices;
- List of Acronyms and Abbreviations;
- Sections delineating components of the methodology
- Appendices – to include forms and other relevant materials, Bibliography and Footnotes
- Waste Audit Findings in detail, including statistical data analysis and supporting documentation (e.g. tables, charts, etc.)
- Categorizations for each participating steward based on the SABC member's individual requirements (i.e. number and description of product breakdown, weight vs. unit counts, etc.) See for example the attached Appendix "A"
- Observations and Recommendations;
- One double-sided print unbound original of the approved final report must be provided to each steward plus one electronic version (on disc or other storage format)

4.1 Defining Waste Audit Areas, Timelines & Implementation Schedule

The residential and ICI waste to be sampled will originate from each of the five chosen areas within the province. A waste audit will be conducted in each of the five regions over the next 5 year period. Specific regional districts may be identified and established at a later date.

Region 1 - Metro Vancouver

Region 2 - CRD

Region 3 - Interior B.C.

Region 4 - Northern B.C.

Region 5 - To be determined in consultation with the regional districts

5.0 Funding Formula Options

SABC agrees to fund a total of 5 waste audits in the five year period on a 50/50 cost share basis with the specific regional district to a maximum to be determined.