

Consultation Summary for Packaging and Printed Paper Stewardship Plan

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1. Consultation Approach

For purposes of consultation on the Draft Packaging and Printed Paper (PPP) Stewardship Plan, the following are considered stakeholders:

- Residents;
- Producers of PPP supplied to residents in British Columbia (BC);
- Those currently delivering PPP services including local governments, not-for-profit organizations, private companies, First Nations governments;
- Those potentially interested in delivering services under the PPP Stewardship Plan including local governments, not-for-profit organizations, private companies, First Nations governments; and
- Those with an interest in the management of PPP.

Multi-Material British Columbia (MMBC) has used a combination of mechanisms to consult with stakeholders during development of the PPP Stewardship Plan.

2. Consultation Activities

In February 2012, MMBC provided opportunities for stakeholders to:

- Review and propose corrections to data presented in the draft version of the report titled *Current System for Managing Residential Packaging and Printed Paper in British Columbia* dated February 2012; and
- Review and provide comments on the draft version of the report titled *Packaging and Printed Paper Stewardship Program Design Options* dated February 2012.

MMBC has been meeting with producers, local governments, not-for-profit organizations, private sector companies and public interest groups to provide opportunities to hear directly from stakeholders and to discuss possible approaches to the PPP Stewardship Plan.

Meetings with local governments, not-for-profit organizations, private sector companies and public interest groups will continue into December 2012.

MMBC also developed a website that was launched on October 10, 2012 as a mechanism to provide information to stakeholders and for stakeholders to submit comments to and ask questions of MMBC.

A Draft PPP Stewardship Plan was posted on October 23, 2012 and MMBC held a consultation workshop with simultaneous webcast on October 29, 2012. Stakeholders were encouraged to submit written comments on the draft plan following the workshop.

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MMBC also presented information about the Draft PPP Stewardship Plan at the Coast Waste Management Association Conference on October 26, 2012 and the Canadian Waste Sector Symposium on November 14, 2012.

Comments received by November 9, 2012 are summarized in this document together with responses from MMBC describing if and how the comments have been addressed in the PPP Stewardship Plan when submitted to the Ministry of the Environment.

MMBC will continue to receive and consider comments on the PPP Stewardship Plan until December 14, 2012. The plan may be refined based on written submissions received and stakeholders meetings between November 12 and December 14, 2012. Written submissions received between November 12 and December 14, 2012 will be added to the Consultation Summary together with responses from MMBC describing if and how the comments were addressed in the updated version of the PPP Stewardship Plan which, if prepared, would be submitted to the Director in January 2013.

3. Summary of Stakeholder Comments

Stakeholders have provided comments through a number of mechanisms:

- Participation in the workshop and webcast held on October 29, 2012;
- Submission of questions and comments using the feedback form available on the MMBC website;
- Submission of comments by email to consultation@multimaterialbc.ca;
- Submission of comments to the Chair of the MMBC Board; and
- Providing responses to a survey available on the MMBC website.

Appendix A provides the questions and comments posed by stakeholders during the October 29 workshop and webcast. The table also includes MMBC's responses provided verbally during the workshop and distributed by email following the workshop.

Appendix B provides the written submissions received via the website feedback form and by email. The table also includes MMBC's responses and a note indicating where the comments resulted in revisions to the PPP Stewardship Plan and where the comments relate to implementation activities. All stakeholders who submitted questions and/or comments will receive the response by email.

The following sections summarize key themes from the stakeholder submissions.

3.1 Producers

While submissions from producers raised company or sector specific issues, a number of common themes were identified:

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- Timing for issuing a fee schedule in order to accommodate corporate budget cycles
- Need for a de minimis policy
- Interpretation of the definition of producer in their specific business model
- Management methods for their types of packaging, for example collection of polystyrene (PS) foam at depots and types of packaging that could be included in organic waste collection systems.
- Governance including representation on and accountability of MMBC
- Ensuing a level playing field through enforcement of the Recycling Regulation
- Harmonization of definitions for producer and PPP, reporting categories and protocol

3.2 Local Governments

Submissions from local governments often raised issues specific to their PPP collection and processing systems and contracts. However, a number of common themes were identified:

- Scope of collection services, pricing of these services and the value of the market-clearing price
- Consideration of regional differences that drive collection costs when setting the market-clearing price
- Market-clearing price for multi-family buildings should be offered to local governments first and offered to the private sector only if local governments decline the offer
- Basis for arrangements between collectors and processors when both parties will be contracting with MMBC
- Process to include consolidation and transfer in MMBC's request for proposals (RFP) for post-collection services when these activities are currently bundled in a collection contract
- Process if MMBC receives no bids in response to tenders for curbside collection contracts or if no local governments or private companies respond to the market-clearing price for multi-family building and depot collection services
- Provision of streetscape collection services in smaller communities (below the proposed reasonable access criteria) and communities with significant tourist activity
- Provision of services to rural and remote communities
- Process to add households not currently receiving curbside collection of PPP or garbage to the PPP curbside collection system in the future
- Measuring the 75% recovery rate by material and by regional district
- Funding for PPP that remains in the local government waste stream
- Managing PPP considering social and environmental objectives
- Representation on and accountability of MMBC

3.3 Private Companies

Submissions from private companies commented on those aspects of the PPP Stewardship Plan that affect their current business model. However, a number of common themes were identified:

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- Basis for arrangements between collectors and processors when both parties will be contracting with MMBC
- Driving local job creation rather than exporting PPP to out-of-province processing facilities and recycling end-markets
- Designing the market-clearing price and the RFP for post-collection services to deliver material quality
- Designing the qualification standards to provide a level playing field for large and small companies
- Managing PPP considering financial, social and environmental objectives

4. Online Survey

Twelve responses were received to the survey available on the MMBC website, seven from local government, three from private companies and two from producers. Appendix C provides the results of the online survey in graphic form. Highlights of the responses include:

- Responses were evenly divided between 'continuing to collect glass in curbside programs where it is already collected and at depots' and 'only at depots'.
- The majority of responses did not support collecting plastic film only at depots.
- Seven respondents indicated that changes will be required to their curbside collection system versus four that indicated no changes would be required. Changes cited included adding materials, removing materials (bound books) and ensuring sufficient capacity for increased volumes.
- Responses were more evenly balanced on changes required to depot collection systems, with six indicating changes are required and five indicating changes are not required. Changes cited included adding materials, modifying depot layout and equipment.
- Eight respondents indicated that curbside and depot collection services can operate efficiently and effectively in the same geographic area while three respondents indicated that each service will operate less effectively because of the other.
- Four respondents indicated they will require more than six months but less than nine months to prepare their collection systems while two respondents indicated they would require more than 12 months. One respondent indicated preparations could be completed in less than three months and one respondent indicated more than three months but less than six months.
- Four respondents indicated they will require more than six months but less than nine months to prepare their post-collection systems while one respondent indicated they would require more than 12 months. One respondent indicated preparations could be completed in less than three months and one respondent indicated more than three months but less than six months.
- Four respondents indicated that post-collection contracts should have a five year term, two respondents preferred a seven year term, one respondent preferred a 10 year term and one respondent preferred a three year term.

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Appendix A – Workshop and Webcast Questions, Comments and Responses

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First Name	Last Name	Affiliation	Question/Comment	Response	Response Status
Mark	Jacobs	3M	Can you explain why general use paper such as blank photocopy paper which is sold as a product to consumers is considered printed paper?	The MOE has described printed paper as paper that is printed or intended to be printed. There are significant amounts of this paper in the residential recycling stream.	Verbal answer during workshop
Scott	Wheatley	Canada Wide Media	Have there been any conversations yet with the wholesalers of magazines and with Canada Post as far as being able to attribute costs to people coming in from other jurisdictions?	Not specifically under this PPP plan development, but I have been involved in those discussions in other provinces so I'm familiar with the course of those conversations. What has been done in this draft definition of Producer is an attempt to define the first importer/first seller in a way that would allow the BC MMBC plan to more effectively capture the import of magazines. I encourage you to review the proposed definition of first importer in the definition of producer that is posted on the MMBC website.	Verbal answer during workshop
Scott	Wheatley	Canada Wide Media	Are there plans to capture unaddressed ad mail that comes into the province?	Unaddressed ad mail is intended to be captured under this program. First importers are obligated for materials that come into BC. MMBC will encourage them to join MMBC or encourage the MOE to undertake appropriate compliance activities.	Verbal answer during workshop
Scott	Wheatley	Canada Wide Media	Let's assume that the newspapers have decided to go it their own way. What happens when your truck shows up at the street corner and non-member newspapers are in the recycle bin? Will you leave them at the street side? Theoretically, I could be covering the cost of recycling other producers' products that aren't signed up to this program.	We're not intending to leave non-member PPP at the street side because this will create confusion for residents. You are questioning the ability to ensure a level playing field. MMBC is reaching out to obligated producers but it also is dependent on the MOE enforcing the Recycling Regulation.	Verbal answer during workshop
Tara	Sawatsky	Canopy	Given that the plan only calculates the quantity of products collected, how does it calculate the amount recycled into new product and that actually reach end markets?	MMBC will require processors to report the quantity shipped to recycling end-markets and the final destination of these materials in order to answer that question,	Verbal answer during workshop

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First Name	Last Name	Affiliation	Question/Comment	Response	Response Status
Tara	Sawatsky	Canopy	Why is the recovery rate calculated as an aggregate since printed paper has a higher recycling rate? Will this allow packaging to free ride on paper collection? Are there targets to ensure that each product can reach a 75% recovery?	The plan is currently based on an aggregate target, in part because there's no data available at the moment on which to base any other approach. MMBC will compile data during plan implementation, including audits of the collected stream and the outputs from MRFs ¹ that would allow MMBC to compare to the data reported by producers to develop information on the performance of each material category. In my experience, it takes a number of years of compiling and verifying data to develop sufficient confidence to support a conversation on material targets.	Verbal answer during workshop
Tara	Sawatsky	Canopy	How will the plan deal with the pollution prevention hierarchy?	The plan sets out to collect PPP when residents are finished using it and to ensure that as much of what is collected is recycled as possible. MMBC will also use its relationship with producers to encourage producers to consider reduction, reuse and redesign.	Verbal answer during workshop
Tara	Sawatsky	Canopy	How is design for environment incorporated into this plan given it is an important principle of EPR?	Section 5.3 provided examples of how producers of packaging and printed paper are modifying design with reduction and reuse and recyclability in mind. This plan may be able to influence those decisions by: ensuring that Producers understand the implications of packaging and printed paper design in processing systems and recycling end-markets; and, through the principles that will drive cost allocation so that producers making decisions that help the PPP system be efficient and effective are appropriately rewarded and the Producers that have made decisions that make that more challenging receive the appropriate price signals.	Verbal answer during workshop
Tara	Sawatsky	Canopy	if a Producer is using materials that already contain recycled materials, would it having a differential cost?	Recognizing recycled content in the cost allocation methodology has been discussed in some other jurisdictions. Part of the challenge is measuring the baseline. Do you reward someone who made a decision 20 years ago to use recycled content when this plan starts in May 2014? Generally, this is about rewarding the Producers that are using packages and products that help make the PPP system efficient and effective. Recycled content has been considered too complex to consider.	Verbal answer during workshop

¹ Material recycling facility

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Russ	Smith	Capital Regional District	Have you determined the process by which the collector market-clearing price will be determined? Will you break down the price for specific areas?	We can't be definitive until we do the research to see what the variations are in the cost of curbside collection, depot collection and multi-family building collection across the province. If there is significant variation, if there are circumstances that drive different costs in one geographic area versus another, then we will reflect that in the market-clearing price. But we have to do that research before we can define what those different categories would be.	Verbal answer during workshop
Russ	Smith	Capital Regional District	You have all the information to understand what our collection costs are from the Phase 1 project. You could set a market clearing price that is designed to have the local government decline the offer so that MMBC can tender for the service versus going with local government.	Data provided in the Phase 1 project represented, in most cases, bundled costs so that we have very few data points on separate collection costs for curbside, multi-family and depots. We would like to increase the number of data points to have more confidence in the data by undertaking field work over the next few months with those who are able to provide us with the breakout of the cost by service. Part of the consideration is not to disrupt service to residents, to leverage local governments' relationships with residents and not force a disconnection of integrated collection systems. The objective is not to drive local governments out of the business; it's about developing what is a reasonable market clearing price offer for an efficient delivery of the service and allowing local governments the opportunity to decide whether they want to stay in the business at that price or whether they would prefer not to continue to provide that service, at which point MMBC will go to tender.	Verbal answer during workshop

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Al	Metauro	Cascades Recovery, Cascades Inc.	Industry needs to know the list so that we can design for that list. We should give more credit to what industry can do and step up the process to add materials to the collection system. As a producer, do I worry about 75% of my packaging being collected or do I just worry about how well the PPP program is doing as a whole?	Each producer of packaging and printed paper should be concerned about whether or not their package or printed paper is recyclable, whether it can be included in the collection and recycling system, or whether there are barriers - a product design barrier, a collection and processing barrier, or an end market barrier - that needs to be resolved to collect more, collect it more efficiently and effectively, or get it into the collection system in the first place. The plan includes a description of the effort that MMBC will undertake to compile the data in order to have a conversation on material-specific targets but that data doesn't exist today. Those data will not be tracked by brand so we won't know if the plastic wrap over your products is included but we will know the quantity of plastic film. We are proposing to collect plastic film at depots, until the technical challenges to collect it at curbside can be overcome. This is not an effort to avoid collecting plastic film or to minimize the quantity collected. Rather, it's an effort to collect it in the most appropriate and cost-efficient way to reach the 75% target.	Verbal answer during workshop
Al	Metauro	Cascades Recovery, Cascades Inc.	Am I paying for 100% of the cost of collecting 75% of my material even though it may not be collected?	You are contributing to the cost of operating the PPP program of which you, as a producer, are a member.	Verbal answer during workshop
Al	Metauro	Cascades Recovery, Cascades Inc.	What should I invest in as a processor - to manage single stream or multiple stream PPP? What criteria are you going to use to evaluate my bid and what is MMBC going to choose?	There is existing infrastructure and we're not talking about changing the entire landscape of the MRF capacity in BC between now and May 2014. Changes are likely to occur in an evolutionary way over time that will allow both collectors and processors to adapt their systems to drive towards the outcome which is more materials recycled and higher commodity values.	Verbal answer during workshop

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Al	Metauro	Cascades Recovery, Cascades Inc.	How many different collection companies are you anticipating providing the market clearing price to? How do you differentiate the single-stream price collection and the two-stream price collection? Have you identified the processors or the locations where those processors are going to be so that you can allocate the collectors to a processing facility?	In the Phase 1 project, we identified 200. Whether there will be 200 that are interested in participating in this program remains to be seen, but we identified 200 in the Phase 1 project. We will be looking at how to set the market clearing price to drive maximize PPP recycled and commodity revenues. We want collectors and processors to self-select, but we have looked at the points of PPP generation and the locations of the 40 or so MRFs that exist in BC today. We know their current catchment areas but the purpose of the request for proposals is to allow processors and collectors to consider how to provide consolidation and transfer, which does not exist to a great degree in BC today - where that makes economic sense. We expect that the catchment area may be different after the request for proposal than it is today.	Verbal answer during workshop
Al	Metauro	Cascades Recovery, Cascades Inc.	What are my fees going to be for the first year? And how are you planning on telling me what those fees are considering all of these variables, lack of data and not telling collectors and processors what to do?	We are assuming that there are some key activities, one of which is the research into the market clearing prices so that we will be able to make the offers to collectors. Once we know who the qualified collectors are, then we move on to the RFP for processors. We would like those activities to be complete by the end of the third quarter 2013, for a number of reasons. One is to allow the collectors and processors some time to prepare for May 2014. The other is to use these costs for purposes of cost allocation over the data that producers will report in quarter two of next year so that by this time next year we have fees calculated.	Verbal answer during workshop
Al	Metauro	Cascades Recovery, Cascades Inc.	Is there going to be a timeframe about what's going to happen in the next three years, the next five years, the next seven years, the next 10 years, so that we can plan our investments?	We'll consider your request.	Verbal answer during workshop
Caroline	Jackson	City of North Vancouver	The timeline currently is very challenging for us to provide meaningful feedback and engage with our councils. If we submit comments after November 9 but before the end of December, will it be considered?	We will accept comments until the middle of December. The intention is to submit a plan to the director on November 19th but if we receive comments between November 9 and December 14 that result in any changes to the plan, we'll submit an updated plan in early January.	Verbal answer during workshop

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First Name	Last Name	Affiliation	Question/Comment	Response	Response Status
Caroline	Jackson	City of North Vancouver	Is it conceivable that you could have two contracts within one municipality, so one for curbside and one for multi-family private property collection? If this is the case, how would communications work for residents?	MMBC could contract with a local government for both curbside collection and multi-family building collection. In my experience, communications to multi-family residents who are taking their PPP to central storage area somewhere on the property is typically delivered via the property manager. We would envision two types of communication, one for curbside service and one for the multi-family residents in high-rise buildings. But we are intending to have the same list of PPP collected in both systems so that communications materials can deliver consistent messages.	Verbal answer during workshop
Caroline	Jackson	City of North Vancouver	If multi-family residents set PPP on the curb, it would be collected under the curbside system. Correct?	Yes.	Verbal answer during workshop
Monica	Kosmak	City of Vancouver	Please explain the reasoning for distinguishing between multi-family at curbside and multi-family on private property. I'm wondering if you have assumed that local governments currently collect only from curbside and don't collect from private property multi-family buildings.	We are aware that some local governments collect from multi-family buildings where the building holds its recyclables on its property for collection.	Verbal answer during workshop
Monica	Kosmak	City of Vancouver	in the event that local governments opt out of providing the collection service, I'm wondering what MMBC's level of commitment will be to the quality of service under the collection qualification standard and if MMBC will work with local governments to select a service provider and coordinate on service delivery elements?	We are intending to develop collector qualification standards that among other things will allow local government to understand how MMBC will approach tendering for curbside collection of PPP. If the local government declines the market clearing price offer and MMBC then tenders for the curbside collection of PPP in that jurisdiction, the decision about who will be selected is MMBC's decision. However, there will need to be some degree of collaboration to ensure that the communication to residents about the PPP collection system and the communication to residents about a garbage collection or organics collection system don't create confusion.	Verbal answer during workshop

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Monica	Kosmak	City of Vancouver	Where a local government and a private company are both qualified as collectors, does a processor solicit agreements from both? Does a local government providing curbside collection approach a processor or with the processor approach the local government? For a local government to evaluate whether or not that market clearing price is economical, we feel we need to know the qualified processors because the distance from the local government to the processor is a critical variable in terms of our cost.	We expect that processors will need to understand the quality of the collected material, the arrangement for pick up or delivery, the interface between collection and post-collection and the various roles of the parties in order to respond to the RFP. We expect conversations will occur between collectors and processors when the processor is preparing its submission under the RFP. That is expected to occur in the third quarter of 2013, well in advance of May 2014.	Verbal answer during workshop
Monica	Kosmak	City of Vancouver	I note the comment that, because eco fees aren't going to be collected on the PPP, technically the Regulation does not require audited financial reports. While I did note that it says that it may be at MMBC's option to choose to do so, I would like to make the point that I think that it's essential for transparency.	Thank you for your comment.	Verbal answer during workshop
Tamara	Shulman	EBA	Some of the packaging products could be composted or handled through organics management. How do you plan to engage the producers as well as processors? How does organics diversion fit into the pollution prevention hierarchy?	The first step is to do composition audits of the organic stream to identify what types of soiled paper packaging or biodegradable packaging are present in order to address your questions. Composting is, from our understanding, included in the recycling category of the pollution prevention hierarchy. We're anticipating that some of the audits would occur prior to plan launch in May 2014.	Verbal answer during workshop
Sarah	Watts	Golder Associates	If a local government does not currently offer curbside garbage or recycling collection but they are designing a program and intend to implement it in the next year or two, would they receive the market clearing price offer? What is the cut-off in terms of timing?	The market-clearing price would be offered to local governments that are providing garbage or recycling curbside collection services now.	Verbal answer during workshop
Ian	Kidd	KT Brokerage	What is the plan to deliver a fair distribution of costs given a 75% aggregate measuring tool to the member producers of the PPP?	It's intended that the producers of obligated packaging and printed paper will all contribute in ways that are consistent with the principles of cost allocation described in the Draft PPP Stewardship Plan.	Verbal answer during workshop

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Sylvia	Skene	Magazine Association of BC	A significant proportion of magazines are kept much the same way residents keep books, meaning residents do not set them out for recycling	Magazines are considered a category of printed paper and are captured by the definition of printed paper in the recycling regulation and captured under the definition of producers so they are part of this program. During implementation of a PPP plan there would be an effort made to identify the portion of the printed paper stream that is actually magazines.	Verbal answer during workshop
Sylvia	Skene	Magazine Association of BC	Where you made the distinction between residential and commercial properties, why was there a distinction made between what you would tackle and what you wouldn't?	The BC MOE has directed that this program is for residential PPP only. While the BC MOE has indicated that Industrial, Commercial and Institutional (ICI) PPP may be added at some point in the future, for the time being, the program is for residential PPP only. MMBC must develop the protocol to segregate residential from ICI for purposes of reporting and payment.	Verbal answer during workshop
Sylvia	Skene	Magazine Association of BC	Where both public and private collection services are presently available in the community for depots and multi-family buildings, who would be chosen if they both were interested in delivering these services?	We were not intending to select but rather offer the market-clearing price financial incentive to both local governments and private companies interested in servicing multi-family buildings or operating depots. If there are multiple depot operators, multiple multi-family service providers that all meet the qualification standards and all willing to accept the market clearing price, they would all be qualified as collectors and they will solicit PPP on which they would be paid.	Verbal answer during workshop
Sylvia	Skene	Magazine Association of BC	Would there be an opportunity for residents to rate depots before the contract is awarded because I understand there are some depots that have low ratings in terms of their service to their community?	We are anticipating that the collector qualification standards should be the mechanism that distinguishes a good performer from a performer that MMBC does not want to enter into an agreement with.	Verbal answer during workshop
Sylvia	Skene	Magazine Association of BC	Have incentives such as partial refunds, low-cost loans to upgrade equipment been considered as smaller communities wouldn't have the capital to take advantage of this opportunity?	The intention, based on the discussions to date, has not been to provide capital grants or loans but rather to ensure that the market clearing price adequately reflects amortized capital.	Verbal answer during workshop
Sylvia	Skene	Magazine Association of BC	Will the selection of a post-collection provider include analysis of environmental costs of transporting?	The need for consolidation and transfer and the distance that materials will be transported will be reflected in the bid prices.	Verbal answer during workshop
Sylvia	Skene	Magazine Association of BC	With respect to the dispute resolution process for residents, are these individuals, strata councils, other boards and/or management companies?	If a board or a strata council is receiving multi-family services from an MMBC contracted agent, I would consider them 'residents' for the dispute resolution process.	Verbal answer during workshop

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Sylvia	Skene	Magazine Association of BC	Where the audits of collected and processed materials alter the costs allocated to Producers?	Producers will be subject to audit and compliance activities to ensure that they're reporting accurately. Similarly, data reported by collectors and processors will be subject to audit. These data will improve over time and these continuous improvements will be reflected in the way that costs are allocated.	Verbal answer during workshop
Sylvia	Skene	Magazine Association of BC	How will MMBC distinguish between magazines, flyers, booklets and other printed materials in the audits?	The composition audits typically utilize a long list of categories. The process involves literally segregating a bale or a tonne of PPP to identify what is a magazine versus a telephone directory versus a flyer versus a newspaper.	Verbal answer during workshop
Sylvia	Skene	Magazine Association of BC	What about producers located in another province or outside of Canada?	If producers are located outside of BC, in other Canadian provinces or other countries, they can volunteer to be obligated under the MMBC program.	Verbal answer during workshop
Sylvia	Skene	Magazine Association of BC	Will magazines that use recycled paper and other environmentally-friendly processes get a discount on their fees?	We have not developed a cost allocation methodology to that level of detail. Generally speaking, producers that use printed papers or packages that are easily recyclable and that generate high revenue tend to have a benefit in their fees compared to those that don't. PPP stewardship programs that exist in Canada have not utilized this type of criteria to allocate costs due to the inherent complexity.	Verbal answer during workshop
Sylvia	Skene	Magazine Association of BC	Will there be an opportunity before producer fees are announced for feedback, modifications and one final review by producers for input into the fees?	Not necessarily into the fees but into the methodology. We would expect there to be discussions on the principles and the methodology.	Verbal answer during workshop
Tony	Moucachen	Merlin Plastics	Having glass into the Blue Box decreases the quality of the commodity that's coming out of the program and it increases the cost of sorting the material, never mind the safety of handling glass from collection to end markets. I like your hybrid system whereby you have identified that plastic film should go through a depot system and I think this is an opportunity for British Columbia to re-think what's being collected in the Blue Box.	BC is unique because not all of your curbside programs currently include glass. It's been removed from some of them and it's at depots only in some areas, which we saw as a potential opportunity to address the issues that you raise. It appears, based on discussions with stakeholders over recent weeks, the most significant barrier is a concern among some about the challenge of re-educating residents to remove glass where it's already included.	Verbal answer during workshop

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Tony	Moucachen	Merlin Plastics	Stewardship has three dimensions. One is financial, as you have clearly identified with very good metrics to measure; one is environmental; and, one is social. Could you please give us some idea what are the metrics for the social and environmental implications of the stewardship plan? Examples of social implications include: meeting safety standard, paying a fair pay to employees.	We have addressed environmental implications through the product life cycle management and the pollution prevention hierarchy, with the intention of working to improve the environmental performance of the PPP system and the overall environmental impacts of PPP through its life cycle. Some of the examples of social implications will be addressed in the qualification standards, and others will be addressed, or at least clarified, by tracking PPP to final disposition.	Verbal answer during workshop
Helen	Spiegelman	Product Policy Institute	Which category provides the largest volume or weight or quantity of the PPP category? Would it be the printed paper or the packaging?	Generally it's printed paper but keep in mind we have not had the Producers of PPP in BC report what they supply to the residential marketplace yet, so we actually have no data on the quantity of PPP supplied by Producers in BC today, but based on other provinces, printed paper exceeds packaging in weight.	Verbal answer during workshop
Helen	Spiegelman	Product Policy Institute	I notice that the current list of MMBC board members does not include the newspaper association or any representative of producers of printed paper. How many producers of printed paper have signed letters of intent or indicated that they will?	In terms of the letters of intent, we are continuing to receive letters of intent and I am not aware of which producers have signed letters of intent. Discussions are continuing with the Canadian Newspaper Association and this plan is being prepared for the entire category of packaging and printed paper.	Verbal answer during workshop
Tony	Sperling	Sperling Hansen Associates	I don't understand how you envision the relationships between collectors and the processors will work. Who will tell a collector which processor they should ship their PPP to?	We're expecting that processors will respond to the RFP for the PPP collected by qualified collectors with whom they wish to do business. We would like the collectors and the processors to self-select their relationships.	Verbal answer during workshop
Tony	Sperling	Sperling Hansen Associates	I see this as a transfer of public money that's currently being paid to municipal government to provide local jobs in municipal government to the private sector. MMBC can select the lowest cost service provider, and that might be in British Columbia or another province, or even overseas. Is there going to be some process to evaluate the economic benefits of keeping processing jobs here in British Columbia?	The language around best value to MMBC, taking into account the audits and compliance activities related to in-province and out-of-province processors and end markets, is intended in part to address that issue. But having said that, a lot of the PPP that's currently collected and processed is leaving BC for recycling end-markets now. One of the potential benefits of MMBC looking to processors for information on the final destination of the PPP is being able to understand the flow of PPP and where it might be best utilized to benefit the PPP program in BC. I'm not suggesting that MMBC is going to step in and dictate, but we certainly want to understand the final recycling market destination for those materials.	Verbal answer during workshop

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First Name	Last Name	Affiliation	Question/Comment	Response	Response Status
Dion	White	Sunshine Coast Regional District	If a collection service could not be provided for the market clearing price, would that effectively mean that the collection service would not be provided for our community?	If you are providing PPP or garbage curbside collection service now, you would be considered the incumbent collector and would receive the market clearing price offer. If you decline, MMBC would issue a tender. If the bid price is higher than the market-clearing price, MMBC would not provide curbside collection service. For depots, the market-clearing price would be offered to any qualified collector - local government, not-for-profit or private sector. We would look to the marketplace to respond to the market clearing price offer for depots and hope that there is someone who is willing to do it for that price.	Verbal answer during workshop
Dion	White	Sunshine Coast Regional District	What assurance could you give that the process of determining the market clearing price will not disenfranchise a small community by offering something that really isn't realistic?	MMBC must build collection services to achieve the recovery rate. The market clearing price needs to be set at a level that will generate sufficient collection activity to achieve the 75% recycling target. While MMBC needs to consider economies of scale in efficiently delivering collection services, it is not MMBC's intention to offer the market clearing price only in the Lower Mainland.	Verbal answer during workshop
Dion	Whyte	Sunshine Coast Regional District	Would a depot be considered as providing collection services for multi-family households?	We expect both single family and multi-family to utilize the depots.	Verbal answer during workshop
Dion	Whyte	Sunshine Coast Regional District	When establishing that market clearing price for depots, will the price be for only polystyrene foam and plastic film or for all types of PPP?	We anticipate that market-clearing prices will be offered for depot collection services for PS foam, plastic film and for all PPP.	Verbal answer during workshop
Dion	Whyte	Sunshine Coast Regional District	I note that streetscape is proposed to be provided in communities greater than 20,000 people with fairly high densities so this would effectively rule out smaller towns. Have you tried to account for tourism in determining what communities will receive streetscape services?	The proposed criteria for streetscape do not attempt to introduce tourism. It uses data available from StatsCan.	Verbal answer during workshop

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Dion	Whyte	Sunshine Coast Regional District	What happens if MMBC does not receive a bid price to service a particular qualified collector?	We're hoping that there is enough interest among the processing community to provide at least one, preferably more competitive bids, for every qualified collector. I expect that a processor interested in growing their business will consider PPP coming from any part of this province as an opportunity to grow their business. I'm hoping that what you described does not occur but if it does, MMBC will explore the reasons why processors did not respond to that geographic area and attempt to overcome whatever barrier existed.	Verbal answer during workshop
Dion	Whyte	Sunshine Coast Regional District	I'm wondering if subscription-based collection service providers have been considered. Collectors will be qualified in advance of the processing RFP. Since a municipal collection service is often designed with the processor in mind, how will collectors determine whether to use multi-stream collection service if their PPP may go to a single-stream MRF?	In determining the approach to collection services, in particular the use of the market clearing price incentives, our intention was to disrupt as little as possible the varied collection infrastructure that exists on the ground now. Those who are operating subscription services now may be in a position to respond to either a local government who is currently providing garbage collection and wants to provide PPP curbside collection or, if MMBC tenders for curbside collection, they may choose to respond. It's up to them to decide how they will respond to the opportunities that might be available to them. With respect to the design of your collection system, our intention in drafting the collector qualification standards is to provide clarity to collectors on the collection service required. If you have a multiple stream collection system, there are certain MRFs that will be more interested in your material than others. Similarly, if you have single-stream PPP, certain MRFs are likely not interested in your material. This is why we think the conversation needs to occur between collectors and processors.	Verbal answer during workshop
Dion	Whyte	Sunshine Coast Regional District	A municipality that is using a multi-stream collection system may spend a little bit more on collection but they anticipate saving on processing. Will the market clearing price be determined separately for multiple streams versus a single stream?	We've been looking at the data we have now for the cost to collect and process single stream versus multi-stream. This will be one of the considerations that we take into account during the research into current collection costs. We are not intending to drive this system to more complicated and more costly collection and processing or to approaches that result in more problems preparing materials for commodity markets. The objective is to maximize the amount of PPP that is directed to recycling and maximize commodity revenues. We understand that material quality is important to achieve that outcome. We will be looking at how to set the market clearing price to drive those objectives.	Verbal answer during workshop

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Dion	Whyte	Sunshine Coast Regional District	With regards to PPP collection services for single family households, is it correct that a local government will be offered the market-clearing price if the local government provides garbage or PPP curbside collection service? Where the local government declines the offer, will MMBC determine whether it is cost effective to go out to tender on that collection service or is it committing to go out to tender for that collection service so long as garbage service is in place?	Collecting PPP at curbside where garbage is collected at curbside provides an equivalent level of service. We have had a number of local governments indicate they would prefer not to have curbside collection of PPP but rather to stay with their depot collection. So we need some flexibility to reflect these differences but the intention is to provide curbside collection of PPP because that's an equivalent level of convenience and we're hoping that that increases the capture rates for the PPP.	Verbal answer during workshop
Laura	Selanders	Target	Will MMBC inform BC producers of those that have volunteered to be producers?	Information on companies that volunteer to assume the obligation will be made available to other producers to avoid double reporting.	Verbal answer during workshop
Laura	Selanders	Target	If the data management process used by a retailer stands up to the rigour test of auditing in the other provincial programs, is it likely to stand up to the rigour of MMBC's audit process so that we don't have to reinvent the wheel?	Yes, that is part of the objective of harmonizing steward-facing services. Especially where there's a Producer that's operating in more than one of the Canadian PPP programs, we'd like to harmonize the producer audit so that you're audited once, not four times, for example.	Verbal answer during workshop
Laura	Selanders	Target	I noted that you were talking about putting together a fee schedule for consideration in Q4, 2013. I encourage you to get that out as soon as possible as most of us are done our budgeting for 2014 by Q4 of 2013.	Thank you for your comment.	Verbal answer during workshop
Laura	Selanders	Target	How do we get to 75% when that number hasn't yet been achieved by any of the other provinces who arguably have at least a few years behind them? I'm trying to understand what is different about MMBC to help us get to that rather lofty goal. What do we do if we don't get there?	One of the key differences between the BC program and the programs in the other provinces, most particularly Quebec and Ontario, and to some degree, Manitoba, is that it is a municipal decision about which materials are collected in those provinces. In BC, we're taking a different approach as MMBC will be deciding which PPP are included in the collection system. A uniform list of PPP collected across the province hasn't been achieved in either Quebec or Ontario.	Verbal answer during workshop

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Philip	Solman	Two Spoons Media	If residents keep magazine publishers, doesn't that make it hard to determine the recovery rate?	In some of the other programs where the retention of a product is significant and it affects a large part of the program, there's an effort to take into account life span in order to adjust the denominator in the recovery rate calculation. That's not typically done for PPP because most of the products of the total weight of PPP supplied to the residential marketplace are used fairly quickly and discarded fairly quickly. Magazines may be an exception. If there's a large gap between the quantity of magazines in the collection stream and the quantity of magazines reported by obligated producers, we may need to look at why that gap exists.	Verbal answer during workshop
Philip	Solman	Two Spoons Media	How are costs allocated to producers?	MMBC will be collaborating with the other provincial PPP programs across Canada to harmonize the steward-facing services, including the cost allocation methodology. MMBC will be looking to the three provincial PPP producer responsibility programs to identify where they have developed a cost allocation system that is effective and drives the pollution prevention hierarchy behaviour. There is always room for improvement and the principles of continuous improvement will be applied.	Verbal answer during workshop
Philip	Solman	Two Spoons Media	As a producer, I don't know what I'm signing up for and what it's going to cost me.	There are a number of steps required to determine the cost for an individual producer: determine the cost of the system; and, compile data from producers so we know the quantity of PPP over which those costs are going to be allocated. We'll be researching collection costs to set the market clearing price offers, issuing the RFP for post-collection services to determine those costs, developing a communications and promotion and education strategy, adding those costs together and allocating it across the PPP reported by producers. This is the first step of a process and determining actual producer costs is part of the detailed work that needs to occur during implementation. Now, you are being asked by the MOE to either submit your own plan and sort out all those questions yourself, or execute a Letter of Intent with MMBC. The Letter of Intent gets you to the next stage where MMBC and producers will enter into an agreement.	Verbal answer during workshop
Philip	Solman	Two Spoons Media	Any information you can give us before the last quarter of 2013 on how much we're going to be expected to pay could be the difference between us still being around in 2014 or not.	We'll consider your request.	Verbal answer during workshop

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Philip	Solman	Two Spoons Media	When exactly do Producers start paying?	The obligation for Producers begins in May 2014.	Verbal answer during workshop
John	Kendler	Urban Impact Recycling	If you encounter the case where two adjoining municipalities both opt out, would MMBC aggregate those jurisdictions together for tendering curbside collection services?	Yes.	Verbal answer during workshop
John	Kendler	Urban Impact Recycling	If a municipality declines the market-clearing price for curbside collection, is this their only chance, they're out forever?	Yes. Should the local government wish to provide PPP services at some future point, they could respond to an MMBC tender.	Verbal answer during workshop
John	Kendler	Urban Impact Recycling	Processors will be contracted by MMBC based on the list of qualifications and will be paid by MMBC on a per tonne basis. Will processors have to solicit tonnes of PPP from collectors?	To respond to the RFP, processors will have to know the circumstances of the collected tonnes, for example the condition of the materials that are being collected. A processor may choose to bid on a certain group of collectors because they like the material quality and it suits their processing equipment. They may choose not to bid on tonnes from other collectors. We will provide processors with information on the qualified collectors and the quantity we anticipate they will collect so that the processor and collector can have a conversation about material quality and the need for consolidation and transfer, if that's required, before the processor prepares its bid price.	Verbal answer during workshop
Nicole	Stefenelli	Urban Impact Recycling	The draft plan suggests collaboration with governments to increase recycling rates. Which governments and what type of collaboration do you plan to do? I would encourage you to include dialogue and discussion with industry on how to drive diversion.	Working with local governments in terms of bans, mandatory recycling, reduced garbage collection frequency or user-pay for garbage, any of the various mechanisms that have been used by some local governments to try to encourage both participation and capture rates in the recycling program.	Verbal answer during workshop
Nicole	Stefenelli	Urban Impact Recycling	Is the market-clearing price going to be provided to the municipal or the local government first?	Where PPP is set at the curb on public property or on streetscape on public property, the intention is to offer a market clearing price first to local governments.	Verbal answer during workshop
Nicole	Stefenelli	Urban Impact Recycling	How would processors be compensated for handling and sorting those most difficult to process materials that may take months or years to establish an end-market?	Our objective is to have the materials moved through to market. We can include questions on that subject in the REOI to understand what implications there are for processors in terms of inventory of material, but the objective is to move materials through to recycling end markets because that's how MMBC measures its program performance.	Verbal answer during workshop

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Nicole	Stefenelli	Urban Impact Recycling	How many municipalities have expressed their interest in getting out of the collection of PPP in the process?	Less than five of those with whom we have had conversations.	Verbal answer during workshop
Nicole	Stefenelli	Urban Impact Recycling	When will a municipality providing multi-family service be offered the market-clearing price and when would it be offered to the private sector?	Where multi-family residents put materials at the curb as part of a regular, single family curbside service, that part of multi-family will be dealt with through the offer of the market clearing price to the incumbent local government collector for curbside collection. So multi-family, going to the curb is part of the market clearing price offer to local government for curbside collection. Multi-family that is not going to the curb, that's managed in some other way, is where a market clearing price would be offered to any qualified collector. It could be a local government or it could be a private sector company. We're not selecting a single collector. We're saying, local government and private companies can both be qualified and receive the market clearing price for the multi-family buildings that they service. They can operate in parallel. They can operate in competition with one another. We're not selecting which one of them will provide that service.	Verbal answer during workshop
Nicole	Stefenelli	Urban Impact Recycling	Social and environmental issues do need to be considered when setting a market clearing price in order to incentivize behaviour like natural gas engines for vehicles for collection.	Thank you for your comment.	Verbal answer during workshop
Nicole	Stefenelli	Urban Impact Recycling	What exactly is going to happen in May 2014?	Before May 2014, MMBC will know which collectors are going to be qualified under its program and we'll know if there are any gaps in the collection service that it needs to address directly. So in May 2014, if the collectors that are qualified with MMBC are the same folks that are collecting in April 2014, the collection service may not change dramatically other than it might include more materials, assuming that the collectors and the processors can both manage that expanded list of materials in May 2014. With respect to processors, the flow of PPP from collectors to processors may change depending on the outcome of that RFP.	Verbal answer during workshop

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Nicole	Stefenelli	Urban Impact Recycling	How would collectors of multi-family PPP who may run commercial collection routes at the same time differentiate the weight of the PPP from multi-family versus ICI?	Methodologies have been developed in some provincial programs using the number of stops to estimate the quantity from residential versus ICI. Our objective, to the extent that it's possible, is to segregate residential PPP from ICI PPP. We understand that this is not always possible while delivering an efficient collection service and we don't want to arbitrarily increase the costs for the private company or for MMBC, but we do need to find effective ways of segregating the residential from the non-residential PPP.	Verbal answer during workshop
Michael	Zarbo	Waste Management Inc.	You can't just consider price when you're deciding who to hire for a processor or a collector. Safety is a huge factor. Look at the company's safety records and make those a part of the criteria for qualifying a collector or processor.	We expect those to be part of the qualification standards.	Verbal answer during workshop
Michael	Zarbo	Waste Management Inc.	In some jurisdictions, municipalities collect from multi-family buildings but in others, it's an open market and we have existing contracts with property management companies. What will happen to the contracts between municipalities and multi-family buildings and between private companies and multi-family buildings? Are you going to offer the market-clearing price to the property management companies or to collectors?	We have taken the approach to multi-family buildings because both local governments and private companies currently provide this service. The market clearing price is available to both the private sector and the local government, if they are meet the collector qualification standards and are willing to provide the service for the market clearing price that's offered. We're offering the market clearing price to both the local government and the private sector and let property managers decide who delivers the service.	Verbal answer during workshop
Michael	Zarbo	Waste Management Inc.	How does this relate to existing contracts with municipalities?	An advantage of offering a market clearing price to a local government is that, if the offer is accepted, the contract between the local government and a private company to provide collection services can continue without being affected by this arrangement. MMBC and the local government can have an arrangement on the market clearing price and the local government can continue its arrangement with the private sector on collection. With respect to processing, there will be a need for adjustments to contracts between local governments and processors to remove the financial aspects or termination of the processing contract depending on the outcome of the RFP.	Verbal answer during workshop
Helen	Spiegelman		Could you please define recycled for me when you talk about a 75% recycle rate?	The numerator for the recovery rate calculation is intended to be the quantity of PPP shipped to recycling end markets - recycling being	Verbal answer during workshop

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				utilization of the material for a next life.	
Helen	Spiegelman		Is there any measure of what constitutes an acceptable end market, a highest and best as opposed to a lower end market?	An acceptable end market and what is considered recycling will be defined.	Verbal answer during workshop
Helen	Spiegelman		I'd like to ensure that I understand the scope is of this phase so that we can comment. Can you please define the scope of the plan?	We're seeking comments on the 30 page draft PPP Stewardship Plan. We're also happy to take comments on the other four documents that have been posted, although these documents will be subject to ongoing discussions over the next number of months as we move into the implementation phase.	Verbal answer during workshop
Helen	Spiegelman		Are there any other plans that are being prepared? Can the Ministry comment on whether the Ministry is in discussion with other organizations that might have plans?	We encourage you to talk with the Ministry of the Environment.	Verbal answer during workshop
Helen	Spiegelman		I've been harbouring the dream that little stewardship programs might emerge in British Columbia where a product is easy to recycle, but I'm hearing that MMBC will consider that scavenging and may not allow a separate program to collect materials that they have bidding on.	The question about scavenging was not about another legitimate PPP program that has been submitted to the Director for approval.	Verbal answer during workshop
Not audible	Not audible	Not audible	We manufacture expanded polystyrene products. Will manufacturers of packaging that sell to brand owners be considered a Producer? We don't sell directly to households.	That's a difficult question to answer without tracking the commercial ownership of the package through to the household. MMBC is proposing to use the draft definition of producer posted on the MMBC website which is first the brand owner of the product in the package that goes to a household. If the package is used in a commercial business and is not used by a resident, it is not part of this residential PPP program.	Verbal answer during workshop
Not audible	Not audible	Not audible	If glass could be managed outside the curbside system and utilized locally, I think it would be a more efficient system.	There is a footnote to glass in the proposed list of PPP to be collected that indicates those programs that currently exclude it from their curbside collection program can continue to do so. We're not suggesting that glass should be included in curbside because of the problems with cross-contamination of materials and abrasion of processing equipment. We asked, during recent stakeholder meetings, if you're accepting glass in your curbside collection now, would you consider removing it? Many stakeholders felt it would be too difficult to educate residents to exclude a	Verbal answer during workshop

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				material that has been accepted.	
Not audible	Not audible	Not audible	Are you envisioning a single market-clearing price that will be applicable throughout the province?	We need to research collection costs before determining whether the market-clearing price will be a single value or variable to reflect different cost drivers.	Verbal answer during workshop
Not audible	Not audible	Not audible	There are three bullets describing the communities that would qualify for the streetscape collection programs. Are these bullets exclusive or inclusive?	All three criteria, not just one.	Verbal answer during workshop
			When you submit the plan to the Ministry on November 19, will you be posting that version online at the same time?	The plan submitted to the Ministry on November 19 will no longer be draft. We do plan to post it, subject to the agreement of the MOE.	Verbal answer during workshop
Not audible	Not audible	Not audible	How do publicly owned and operated depots fit into this plan?	Where local governments are operating depots now, they can consider the market clearing price offer for depots and continue to provide that service. We're not expecting local governments to close their depots but we are aware that in many jurisdictions there are not only local government depots but also private sector depots, and the offer will go to both.	Verbal answer during workshop
Not audible	Not audible	Not audible	What happens if only a very small proportion of all of the untold tens and hundreds of thousands of producers in BC bother to come forward? Does the Ministry of Environment have a list of all the producers that are obligated?	Every producer is obligated under the Recycling Regulation and is expected to either submit a plan or sign up with an agency that will act on its behalf. You should speak with the MOE about what they will do after November 19th.	Verbal answer during workshop
Not audible	Not audible	Not audible	By members, do you mean producers or does it include collectors and processors?	MMBC members are producers. Qualified collectors and processors will be considered to be contracted service providers.	Verbal answer during workshop
Not audible	Not audible	Not audible	For the selection criteria for collectors and processors, is there any preference between profit and non-for-profit?	No.	Verbal answer during workshop
Not audible	Not audible	Not audible	There is a list of criteria to select processors such as price, capacity, location, et cetera. Will you also consider the way the material will be handled, such as whether it is processed locally or shipped overseas?	MMBC will consider its cost to manage processor and end market audits and compliance activities which may vary depending on whether it's an in-province or an out-of-province processor and end market.	Verbal answer during workshop

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First Name	Last Name	Affiliation	Question/Comment	Response	Response Status
Not audible	Not audible	Not audible	Have you considered cross-border shopping? The purchase occurs in another province or the States while the cost of recycling is incurred in BC. How is MMBC going to handle this?	You are raising the general problem of tracking imported material. Where the importer is an individual resident, it is challenging. Where cross-border movement is being done by a company rather than a resident, the company is considered a first importer and is obligated. MMBC will encourage first importers to join MMBC or encourage the MOE to undertake appropriate compliance activities.	Verbal answer during workshop

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First Name	Last Name	Email	Question/Comment	Response	Response Status
Brooke	Carere	bcarere@slrd.bc.ca	Will this presentation be available on the MMBC website? If so, when? Thanks!	The webcast is archived and available on the 'consultation' page of the MMBC website. The presentation slides are also posted on this area of the website.	Email after workshop
Janet	Clarke	jclarke@gianttiger.com	The program starts May 2014. When would stewards be required to file their first report and what calendar year's data would be used to calculate the fees?	It is anticipated that stewards will be required to report in late Quarter 2 2013, using 2012 calendar year data.	Email after workshop
Joel	Grant	joel.grant@mappleleaf.com	If our producer fees are not going to be calculated until Q4 of 2013, are the fees due in 2014 to be based on 2013 sales? This would not be enough time to budget for the fees to be paid in 2014; our budgets for the following year are set by August.	It is anticipated that stewards will be required to report in late Quarter 2 2013, using 2012 calendar year data, so that MMBC can set producer fees in Quarter 3 or early Quarter 4. We appreciate the challenges producers face in budgeting for 2014 fee payments and will do our best to provide information as soon as it is available.	Email after workshop
Ralph	Bischoff	anchor@saltspring.com	If a community currently has a mixture of private curbside subscription garbage collection and municipal subsidized depot, what type of service would possible under an MMBC plan?	The local government should consider the market-clearing price offer for depot operation in order to continue to provide this service under the MMBC program. Where there is no local government curbside collection services, MMBC will not offer a market-clearing price to the local government for curbside collection of PPP.	Email after workshop
David	Bois	david.bois@homehardware.ca	Has it been determined when the producers will be reporting, monthly, quarterly or annually?	MMBC is collaborating with other provincial PPP programs to harmonize steward-facing services, including the frequency of steward reporting.	Email after workshop

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Brooke	Carere	bcarere@slrd.bc.ca	I'm happy to see that the draft plan includes developing program incentives to improve recovery of PPP materials and looking forward to learning more. However, curious about where the incentive is for producers to design for the environment?	The methodology to allocate program costs to producers will reflect the relative ease and cost to recycle the package or printed paper product. Producers that utilize packaging that is easily recyclable with strong market demand and commodity prices will be rewarded while producers that utilize packaging with no market demand or minimal market demand with low commodity prices will be encouraged, through the cost allocation methodology, to consider redesign for recyclability.	Email after workshop
Scott	Cassel	scott@productstewardship.us	Glad to hear about the harmonization efforts across provinces. Which entity is coordinating and harmonizing across provinces? Will that be a role of CCME or another entity?	A new organization called Canadian Stewardship Services Alliance Inc. (CSSA) has been established to co-ordinate harmonization activities among the Canadian producer responsibility PPP programs.	Email after workshop
Tim	Des Champ	recycle@citytel.net	We currently offer our residents an eco-depot where we collect PPP products and other stewardship materials from our residents and local first nations communities. We sort and package PPP and ship to end markets. Would you consider us to be part of post collection and a primary processor? Within our Regional District we offer curbside collection of garbage. Will MMBC offer contracts to local governments for curbside collection of PPP materials?	Your regional district can consider the market-clearing price offer for depot operation to accept PPP at your eco-depot. Depending on the type of processing activities that occur at your eco-depot, the regional district could respond to the RFP that will be issued by MMBC for post-collection services, either directly to provide all post-collection services or in collaboration with one or more other primary processors to provide local consolidation prior to shipment to the processor's MRF. MMBC will offer a market-clearing price to local governments that currently provide PPP or garbage curbside collection to provide PPP curbside collection service. If the local government declines the offer, MMBC will tender for PPP curbside collection service.	Email after workshop
Janine	Dougall	janine.dougall@rdbn.bc.ca	What will happen if a local government does not accept the market clearing price offered by MMBC for curbside collection, will MMBC accept any tender bid price received for service provision or will there be a threshold where above a certain price, no service will be provided.	Where a local government currently provides PPP or garbage curbside collection service and declines the market-clearing price offer from MMBC, MMBC will tender for the collection service and will deliver the service where the bid price is equal to or lower than the portion of the market-clearing that represents collection services. Any tendering process that yields only one tender will be evaluated to ensure that the quoted tender price is reflective of the reasonable cost of delivering the service in the area for which the tender was issued.	Email after workshop

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Warrington	Ellacott	warrington_ellacott@whirlpool.com	1. Are Polystyrene and films being collected via curbside systems today? 2. If Poly and film end up in the curbside streams under this plan what happens?	1. 18% of BC households currently receive curbside collection of plastic film and 5% currently receive curbside collection of PS foam. 2. Residents will be re-educated to direct their film and PS foam to depots. Any plastic film and PS foam that is included in curbside programs will be managed during the re-education and transition process. However, including plastic film and PS foam in commingled curbside materials increases processing costs and compromises the quality of processed materials.	Email after workshop
Warrington	Ellacott	warrington_ellacott@whirlpool.com	For 2014 launch will MMBC view compostable and biodegradable packaging materials as disruptive materials?	Biodegradable plastic packaging is a disruptor in the recycling system. MMBC will be undertaking composition audits of organic waste directed to composting to assess the quantity of paper packaging and biodegradable plastic packaging that is being included in the organic waste collection programs by residents and will be assessing the capability of the composting facilities receiving the paper packaging and biodegradable plastic packaging to effectively compost it.	Email after workshop
Glen	Farrow	gfarrow@kamloops.ca	What is 'going to the curb mean'? We currently provide collection for Mobile home parks and townhouses where collection is on private land not public land. Will these be considered 'curbside'?	If these households receive curbside collection service for garbage, they are considered to be households serviced by PPP curbside collection.	Email after workshop
Deborah	Fleming	dfleming@tol.ca	"SF currently receiving curb collection of GARBAGE" by number of garbage customers. BUT Township of Langley provides recycling to ALL households and only urban residents not rural for garbage. So if Market Clearing Price is based on number of garbage customers, this will not work for us. How will this be handled for us??	The market-clearing price will be offered to a local government where the local government provides PPP curbside collection service. As the Township of Langley provides curbside collection of PPP to all of its households, the market-clearing price would be offered to continue providing curbside recycling services to all households.	Email after workshop
Bill	Hardy	bhardy@telus.net	Plant pots, trays, inserts, and sleeves, etc. are considered packaging under the regulations. Are nursery growers, greenhouse growers etc. able to become members of MMBC?	Yes. Producers of plant pots, trays, inserts, sleeves, etc. that are provided to BC residents are targeted in the regulation. Please visit the 'producers' page of the MMBC website (multimaterialbc.ca) to locate a template Letter of Intent which should be executed and returned to MMBC by November 5, 2012.	Email after workshop
Tammy	Hrab	tammy@neat.ca	Will there be enough increase in supply to decrease the fair market value of the materials?	The relationship between supply and demand and the commodity prices offered are affected by many factors, including local and global economic circumstances. As more PPP is collected in BC, market adjustments are expected.	Email after workshop

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Emy	Lai	emylrmm@gmail.com	Any promotion and education plan in other languages? Such as Chinese, Korean, Punjabi, etc.	MMBC will be developing its communication strategy following plan approval. We will take your suggestion into consideration at that time.	Email after workshop
Barry	Lang-Hodge	blanghodge@dominos.ca	It seems like you have taken a very different approach to this than the other three jurisdictions. Would you speak to the reasoning for this. It seems that you have uncovered inefficiencies in the approach taken by the other jurisdictions. Do you believe that you have a business model that will deliver this service more effectively? I am trying to make sense of your approach so I can report to our BC Franchisees?	BC's Recycling Regulation requires that producers assume responsibility for providing reasonable access and recovering 75% of the PPP available for collection. In the other three Canadian jurisdictions with PPP programs, municipalities are responsible for delivering the PPP collection system while producers are responsible for reimbursing a portion of the municipal costs (e.g. 50% in Ontario, 80% in Manitoba and increasing incrementally in Quebec from 50% to 100%). In BC, MMBC, acting on behalf of obligated producers, is able to define the PPP collection and processing services they wish to provide to meet the Recycling Regulation obligation.	Email after workshop
Ed	Linton	elinton@cloverdalepaint.com	When will you request the first report on amounts of PPP from Producers?	In Quarter 2, 2013.	Email after workshop
Karen	Mason-Bennett	karen@neat.ca	Is there a requirement for ISO 14001 or Fair Trade/Fair Labour certifications for factories, especially overseas?	Primary processors providing post-collection services, including marketing of PPP to recycling end-markets, will be required to report the destination of PPP to MMBC. MMBC will assess the need for specifications for recycling end-markets when data on these destinations are available.	Email after workshop
Mark	Mebis	mmebis@wm.com	In regards to multifamily dwellings where set-out of PPP is on private property: 1. When this program is implemented, is it the expectation that the property management company or strata will no longer be required to pay for the recycling services of the products included in the PPP program because the collection company will be receiving a financial incentive from MMBC which is supposed to cover their costs? 2. How do you view the impact on the level of competition between private collectors by setting the price they will be paid for collecting PPP from multifamily dwellings?	1. The Recycling Regulation requires that producers provide reasonable and free access to collection services. MMBC will require qualified collectors that accept the market-clearing price to not charge residents, including MF building property managers acting on behalf of their residents, for the service for which they are being paid by MMBC. 2. We expect that the market-clearing price will provide an incentive for both public and private collectors to service MF dwellings that are not serviced today.	Email after workshop

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John	Mullinder	jmullinder@pec-paper.com	Would you agree that collection zones based on geographic and demographic factors are more efficient than collection zones based on municipal borders? What type of zones are you contemplating, just municipal ones? You seem to be shutting out the possibility more efficient collection zones where municipalities could compete for the zone with the private sector.	The market-clearing price for curbside collection service will be set to reflect the cost to deliver an efficient collection service. Where adjoining local governments decline the market-clearing price offer for curbside collection, these geographic areas will be combined for purposes of tendering for collection services.	Email after workshop
Chetan	Patel	cpatel@kleenflo.com	Is there any de minimis (kilogram or dollar value) limit for producers to reporting and paying fees?	The Recycling Regulation does not establish a de minimis. All PPP producers are obligated, notwithstanding the quantity of PPP they supply to residents. It is anticipated that MMBC will consider the appropriate balance of administrative burden when establishing the reporting requirements and fee obligations for producers.	Email after workshop
Peter	Rotheisler	peter.rotheisler@cord.bc.ca	Can you create and provide a detailed list of PPP materials that won't be collected? Are there size parameters around PPP materials?	MMBC will provide more details on PPP to be included and excluded from the collection system during the implementation phase.	Email after workshop
Brian	Sadler	bksadler@telus.net	Given my understanding that Municipalities have more detailed authority and responsibility than Regional Districts -- for example, RDs have responsibility for garbage collection within rural Areas and to operate/maintain a Regional landfill; but, Municipalities contract garbage collection within their own jurisdiction(s). Therefore, would MMBC entertain a Municipality, which already has a fully functioning Recycling Depot, "out-sourcing" its bid to MMBC via this Recycling Depot, with which it might consider entering into a P3 partnership?	MMBC will offer a market-clearing price financial incentive for depot collection to any qualified collector. The municipality or its contracted depot operator could accept the market-clearing price financial incentive.	Email after workshop
Kimberly	Shanley	kshanle1@wm.com	The market-clearing price will, according to the draft plan, be "monitored and adjusted to reflect changing conditions." This is currently a vague statement. Can we expect the frequency and specific criteria used to modify the market-clearing price be defined and explained later by MMBC?	Yes, to the extent that MMBC is able to define the criteria and adjustment frequency.	Email after workshop

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Roger	Tooms	rtooms@rdks.bc.ca	What about Local Governments currently planning curbside collection, including a recycling component? Thank you.	If the households currently receive garbage collection service at curbside, the local government would receive the market-clearing price financial incentive offer from MMBC to provide PPP collection service to these households.	Email after workshop
Chris	Underwood	chris.underwood@vancouver.ca	Please clarify how "multi-family dwellings" is defined in the plan. "Multi-family" as defined in Vancouver's tax roll, for example, includes numerous types of properties ranging from strata converted single family homes to row houses, townhomes and multi-story condos and apartments. Providing a clear definition of "multi-family" in the plan is necessary for an understanding of collection system impacts for those municipalities that currently collect from smaller multi-family buildings co-located with single family properties on recycling collection routes.	Section 3.3 of the Draft PPP Stewardship Plan defines multi-family (MF) dwellings as including "rental, co-operative, fractional ownership, time-share, condominium and seniors residences". It is expected that MF residents who set PPP at the curb will be serviced on regular single-family (SF) curbside collection routes. Local governments will be offered a market-clearing price for curbside collection from SF households and MF households who set PPP at the curb for collection on regular SF routes. Where MF residents do not set PPP (and garbage) at the curb for collection, it is proposed that MMBC will offer a market-clearing price to both local governments and other qualified collectors to provide service.	Email after workshop
Chris	Underwood	chris.underwood@vancouver.ca	Please define "multi-family" as per the draft plan. In Vancouver we have a variety of multi-family buildings including duplexes, converted single family homes, and row houses as well as what is normally thought of as multi-family - low and high rise condos and apt buildings. Are they all included, or just the latter?	Section 3.3 of the Draft PPP Stewardship Plan defines multi-family (MF) dwellings as including "rental, co-operative, fractional ownership, time-share, condominium and seniors residences". It is expected that MF residents who set PPP at the curb will be serviced on regular single-family (SF) curbside collection routes. Local governments will be offered a market-clearing price for curbside collection from SF households and MF households who set PPP at the curb for collection on regular SF routes. Where MF residents do not set PPP (and garbage) at the curb for collection, it is proposed that MMBC will offer a market-clearing price to both local governments and other qualified collectors to provide service.	Email after workshop
Ben	Van Nostrand	bvannostrand@csrd.bc.ca	Can you clarify how May 19, 2014 will impact existing contracts with collectors and processors?	If the local government accepts the market-clearing price for collection offered by MMBC, the local government can continue to sub-contract to provide these services. Where a local government contacts for processing services, this contract will require, at minimum, modification if MMBC selects the same processor to service the local government through the RFP process and may require termination if MMBC chooses a different processor to service the local government.	Email after workshop
Jim	Vandenham	jim.vandenham@ca.hjhein.z.com	When do we have to start tracking the materials sold in BC starting on May 2014 or the year prior?	It is anticipated that stewards will be required to report in late Quarter 2 2013, using 2012 calendar year data.	Email after workshop

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Jamie	Vieira	jvieira@tnrd.ca	Will local governments be told if MMBC will offer the service in a given area if the local government refuses the clearing house price? When local governments make the decision to accept or refuse the clearing house price will they know if the residents will still receive the same service?	MMBC will publish the collector qualification standards when the market-clearing price financial incentive for curbside collection is offered to local government so that local governments can both understand what will be required of them as qualified collectors and the requirements that would be included in a tender issued by MMBC for curbside collection services, should the local government decline the offer.	Email after workshop
Gary	Vlieg	gvlieg@langleycity.ca	What is the rationale for discriminating between single family and multi-family curb side PPP collection by local government when the local government is already collecting the materials for both?	MMBC is not discriminating between SF and MF curbside collection services. MF residents that set out PPP (and garbage) at the curb for collection on regular curbside routes are included in the curbside service.	Email after workshop
Petra	Wildauer	pwildauer@rdffg.bc.ca	Multi material drop-depots collecting some of the PPP materials are provided by the regional district throughout the entire district. Who would be offered the market clearing price?	The regional district would be offered the market-clearing price for depot collection. The market-clearing price for depot collection is available to any qualified collector.	Email after workshop
Ben	Van Nostrand	bvannostrand@csrd.bc.ca	1) If a community is currently serviced by a curbside program for PPP, will they be guaranteed to receive the same level of service once the Plan is enacted? Scenario - local government/First Nation declines financial incentive offer and no one responds to subsequent tender for collection services. 2) If a local government is not currently providing a curbside program, will MMBC issue a tender for collection services no matter what the size of the local government. The local government in question does not currently have curbside collection of garbage.	1) Where a local government is currently providing either PPP or garbage curbside collection services, the local government will be offered a market-clear price financial incentive to provide curbside collection services for PPP. Should the local government decline the offer, MMBC will tender for the collection service and will deliver the service where the bid price is equal to or lower than the market-clearing price offer for collection services. As companies are typically looking for opportunity to grow their businesses, MMBC anticipate responses to the tender for PPP curbside collection services. Should MMBC receive no bids, MMBC will investigate the reasons for the lack of response. 2) Where neither PPP nor garbage curbside collection services are currently provided, MMBC will not issue a tender for curbside collection services.	Email after workshop because answer during workshop was incomplete and prompted another email with clarification (now last sentence in question)
Nicole	Kohnert	nicole.kohner@rdno.ca	What about 'round up costs' - slide 73? A 'round-up' is a temporary depot that is organized for a particular day and location to accept a range of recyclable or hazardous materials for special management.	Round-up type depots would be eligible for the depot market-clearing price, subject to confirming the provision of consolidation, transfer and processing services through MMBC's RFP process.	Email after workshop to clarify 'round up'; then email response

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Tammy	Hrab	tammy@neat.ca	Slide 51, Will the MMBC work with local waste reduction education providers?	Where a local government accepts a market-clearing price offer, MMBC will collaborate with the local government on resident education, including those with whom the local government already collaborates. Where a local government declines the market-clearing price offer and MMBC is responsible for resident education, MMBC may work with local resident education providers.	Email after workshop; email during workshop was incorrect
Dave	Fowler	cbr1@telus.net	Would MMBC be willing to include a clause in the contract to end the contract on written notice? re: producers	All contractual agreements include exit clauses. MMBC will be consulting with legal counsel on what would be appropriate and reasonable under the circumstances contemplated by the stewardship plan.	Email sent during webcast
gary	franssen	gary.franssen@nanaimo.ca	Some other stewardship programs include the PPP related to their product within their program. Presumably costs attached to the collection of this PPP are included in their fees. Q1 What will MMBC do to ensure double dipping does not take place with fees being charged for the same item in two separate stewardship programs? Q2 What will the impact on curbside service and the client be as much of this material does show up at curbside? Q3 What will MMBC do to make sure their materials accounting/recycling rates will take this input and output into account in the calculation?	MMBC will only charge fees to producers who are members of the MMBC stewardship plan. It is unlikely that a producer would join more than one plan. So there is little risk of "double dipping". Each stewardship plan is required to divert 75% of the materials reported by their producers. In the event that there is more than one plan in BC, the denominator is the sum of all reported material from all producers in every plan and numerator is the total amount of material diverted/recycled from all of these producers. The denominator is provided by producers. The numerator is provided by processors.	Email sent during webcast
Julie	Osborne	julie.osborne@rci.rogers.com	The first importer rules should capture the newsstand copies from foreign magazines - mostly US. This won't capture any foreign subscription copies? Who pays for the processing of the US and foreign magazines bought by subscriptions if they don't volunteer to participate? Their market share is material so it should skew the data.	The definition of producer in BC has been drafted to address this issue. See the Definition of the "First Importer" in the draft definition of "Producer" on the MMBC website: www.multimaterialbc.ca	Email sent during webcast
Peter	Rotheisler	peter.rotheisler@cord.bc.ca	Are you having challenges with any sectors from the Producer group? If so, who? and what are the key hurdles?	MMBC is focusing on working with all producers who are obligated. The intention is to sign a "broad basket" of producers onto its stewardship plan. We welcome all obligated producers to participate.	Email sent during webcast
Melinda	Tan	melinda.tan@kao.com	If professional hair care products are sold directly to salon and not directly to end users and ultimately does not end up in the blue bin of the household, is the manufacturer/brand owners still obligated?	If your products are intended for use by hair salon staff they are not obligated. If the hair salon sells these products to its customers, those products would be included.	Email sent during webcast

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Jim	Vandenharn	jim.vandenharn@ca.hjhein.z.com	Are there minimum levels for exemptions from the regulation either based on sales or material tonnage as other provinces have? If so have they been established?	No. There is no de minimis under the BC Recycling Regulation. MMBC does not have a mandate to establish de minimis.	Email sent during webcast
Greg	Vandervan	greg.vandervan@amway.com	This questions pertains to 'Weight Generated' by material for the purpose of reporting in help determining recovery rates, material fees, etc.. Will this data come from the Producers' submitted reports or from the Processor's recycling facility (total material processed)?	Producers will be required to report material by weight when they report to MMBC. Processors will also have to report materials received from collectors by weight and materials recycled by weight.	Email sent during webcast
Gary	Vlieg	gvlieg@langleycity.ca	If a bank that sends out paper statements considered a "producer" that needs to develop a Stewardship Plan	Yes the bank would be considered a producer. We invite you to review the draft definition documents shown on the consultation page of the MMBC website.	Email sent during webcast
Heather	Barker	hbarker@scj.com	From Heather Barker at SC Johnson. This question is in regard to adding new materials to the program. Could you describe what criteria will be used to potentially broaden the scope of accepted materials? Please provide some examples of potential materials which may be under consideration and confirm this also be harmonized with other programs in ON/MB/QC?	Additional materials will be added to the collection system as recycling end markets are established and as processing capability and capacity is confirmed. It is likely that collaboration among provincial PPP producer responsibility programs will occur to resolve recycling end market and processing capability barriers.	Verbal answer during workshop
David	Bois	david.bois@homehardware.ca	Will MMBC be using calculators to determine PPP for producers who are not manufacturers, like other provinces, or, will they be required to use actuals even they may not be able to ascertain that information by launch date?	MMBC is collaborating with other provincial PPP programs to harmonize steward-facing services, including steward reporting and the use and standardization of calculators.	Verbal answer during workshop
Brooke	Carere	bcarere@slrd.bc.ca	Why are books not included? What about newspaper and magazines?	Books are excluded from the definition of printed paper in the Recycling Regulation. Newspapers and magazines are included as printed paper.	Verbal answer during workshop

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Brooke	Carere	bcarere@slrd.bc.ca	Are there any population and/or density requirements for SF and MF programs? (as is seen in street scape program). Additionally, for resort communities such as Whistler, will total population equivalents be used or census populations?	Population and/or population density factors have not been used as the criteria for reasonable access for SF and MF households. PPP collection services will be provided to SF households that are currently receiving recycling or and SF householders that are currently receiving garbage collection service that can be serviced for the market-clearing price offered by MMBC. MF households that set PPP at the curb for collection on SF routes will be included in the SF criteria. MF buildings which are serviced through arrangements with property managers will receive PPP collection service under the MMBC program where these buildings can be serviced for the market-clearing price offered by MMBC.	Verbal answer during workshop
Jeff	Davie	jeff.davie@purina.nestle.com	Is their standard form for producers to sign for letters of intent? What details would need to be included in producers' plans?	A Letter of Intent template is provided under the 'producers' page of the MMBC website (multimaterialbc.ca). If a producer signs a Letter of Intent to join MMBC, the producer is not required to develop its own plan.	Verbal answer during workshop
Tim	Des Champ	recycle@citytel.net	Will MMBC be responsible for transportation costs to deliver the PPP material to market?	MMBC will issue a request for proposals for post-collection services which include receiving materials from qualified collectors, consolidation and transfer as required, transport to a processing facility, processing, shipment to downstream processors as required and marketing to recycling end markets. Based on the RFP submissions, MMBC will select those to provide post-collection services and will enter into agreements that include associated financial arrangements.	Verbal answer during workshop
Janine	Dougall	janine.dougall@rdbn.bc.ca	In the development of the Market Clearing Price, will differences in transportation and handling costs in rural areas be considered and factored in? Are you going to offer one "provincial" market clearing price or have different "market clearing prices" for different areas of the province?	MMBC will consider the need for differentiation in market-clearing prices based on characteristics that drive collection costs during the research into existing collection costs that will be undertaken in the implementation phase.	Verbal answer during workshop
Glen	Farrow	gfarrow@kamloops.ca	For clarity....Will the existing local government have first right of refusal for depot service and Multi-Family Collection on private property (where programs currently exist) or will this only occur with curbside and streetscape collection?	The market-clearing price will be offered to a local government for curbside and streetscape collection. The draft PPP Stewardship Plan proposes that the market-clearing price for multi-family and depot collection will be offered to any qualified collector, including but not limited to local governments.	Verbal answer during workshop

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Gary	Franssen	gary.franssen@nanaimo.ca	Most curbside programs have some kind of container that resident are supplied or have access to for carrying their materials to the curb. How will these and associated costs be worked into the system and fees paid to collectors.	The market-clearing price will reflect operating costs as well as amortized capital costs, such as collection containers provided to residents.	Verbal answer during workshop
Peter	Grant	recycling@saltspring.com	I am unclear how the Dairy industry plans to avoid its responsibility. Are Dairy containers exempt?	Dairy containers are included in Schedule 5 and recyclable dairy containers will be included in MMBC's PPP collection system. Producers of dairy packaging are obligated under Schedule 5 and are encouraged to be members of MMBC to discharge this obligation.	Verbal answer during workshop
Joel	Grant	joel.grant@mapleleaf.com	Why do producers need to sign a contract with MMBC? This is not required in Quebec, Ontario or Manitoba. Is this an open ended contract or does it need to be re-signed each year?	BC's Recycling Regulation places the legal obligation on each individual producer, rather than on the producer agency as in the other provinces. The agreement between MMBC and producers reflects the responsibility MMBC has assumed to meet the producer's obligation under the Recycling Regulation.	Verbal answer during workshop
Peter	Grant	recycling@saltspring.com	Great job. It is a huge undertaking and I think there are bound to be unknowns for a while...that is why consultation processes work. I am wondering what kind of "market clearing price" is contemplated...would it be dollars per tonne or dollars per household served? (tonnage doesn't work well if it comes around to styrofoam and lightweight material).	For curbside collection, it is anticipated that the market-clearing price will be either \$/HH, \$/tonne or some combination to both reflect the need to service the HH and MMBC's desire to collect as much of the PPP that is available for collection as possible. The volume of each tonne of PPP will be taken into account in setting the market-clearing price. A separate market clearing price for EPS and for film collection at depots is being contemplated.	Verbal answer during workshop
Sharon	Horsburgh	horsburgh@shaw.ca	Not all Municipalities collect from strata's and multi-family (MF) buildings. Is MMBC requiring private haulers to change their collection routes to service MF buildings and exclude other commercial businesses?	MMBC will offer a market-clearing price financial incentive for collection from multi-family (MF) buildings to any qualified collector, including local governments and private companies. Where a private company services MF buildings on the same route as non-MF buildings, factors will be applied so that MMBC is responsible only for MF PPP.	Verbal answer during workshop
Sharon	Horsburgh	horsburgh@shaw.ca	What percentage of the clearing house price includes education costs? Would MMBC contribute to the cost of education programs already being operated by regional districts. What about collections schedules etc.??	The research that MMBC will be undertaking into collection costs in order to set the market-clearing prices will include consideration of the costs incurred by local government to provide resident education programs, including the PPP portion of collection calendars.	Verbal answer during workshop
Tammy	Hrab	tammy@neat.ca	What happens if there is no response to the RFP (slide 68)?	In a competitive environment, MMBC fully expects to receive bids	Verbal answer during workshop

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David	Huettner	dhuettner@b ehr.com	Must all producers under the draft plan be British Columbia residents?	The proposed draft definition of 'producer' posted on the MMBC website allows for a non-resident company to volunteer to assume the producer obligation on behalf of companies within BC. See point # 5 in the definition.	Verbal answer during workshop
David	Huettner	dhuettner@b ehr.com	Suggest that on page 3 of the draft plan, the third bullet point in the list of items that are not considered packaging for purposes of the plan, which currently reads "Empty paint and stain containers and aerosol containers as defined by Schedule 2 of the Recycling Regulation;" be revised to read as follows: "Containers in the Paint product category as defined by Schedule 2 of the Recycling Regulation."	Thank you for your suggestion. We will review Schedule 2 to determine if revisions to page 3 are required.	Verbal answer during workshop
Sego	Jackson	sego.jackson @snoco.org	The questions and answers are excellent all round. Will a written transcript be available? I would find that exceedingly useful. Thanks.	The webcast is archived and available on the 'consultation' page of the MMBC website. The presentation slides are also posted on this area of the website.	Verbal answer during workshop
mark	jacob	mtjacob@m mm.com	Can you explain your logic about including General Use Paper such as blank photocopy paper which is sold as a product to consumers? Quebec currently is using this with a number of issues, especially the fact that this results in an unlevel playing field when other products, such as aluminum foil wrap, plastic film wrap, plastic garbage bags sold to household consumers, are not included?	Based on our understanding of the MOE's intentions, printed paper is to include paper that is intended to be printed with text.	Verbal answer during workshop
Ann	Johnston	ann@ajohnst on.ca	If a depot is serving as a collector, a primary processor and a transporter will it have to negotiate three different contracts with MMBC? As a primary processor, will it have to contract with MMBC or with the secondary processor to which they deliver materials?	A depot operator can accept the market-clearing price for depot collection offered by MMBC. Depending on the activities that occur at the depot, the depot operator may also wish to submit a proposal in response to the RFP for post-collection services. Under this situation, the depot would have two contracts with MMBC - one for operating the depot and receiving the market-clearing price, and a second for providing post-collection services. Rather than responding to the RFP directly, the depot operator could choose to collaborate with one or more primary processors to provide local consolidation and transfer services so that the primary processor could include these services in their proposal to MMBC.	Verbal answer during workshop

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Nicole	Kohnert	nicole.kohner t@rdno.ca	If glass is currently not in a curbside program but rather in a depot system, would that continue so as to not contaminate materials (paper) in the existing program?	Yes.	Verbal answer during workshop
Barry	Lang-Hodge	blanghodge @dominos.ca	If a producer chose not to appoint MMBC as its agent, it would have to then submit its own Stewardship Plan with the MOE. What would this involve, and specifically would it require the Producer to source and enter into contracts with collection and disposal companies and to essentially manage the whole process PPP management?	A producer that chooses to submit its own producer responsibility plan would need to comply with the requirements of the Recycling Regulation, including providing reasonable access and achieving a 75% recovery target within a reasonable time. Please refer to the MOE's Recycling Regulation Guide for more information.	Verbal answer during workshop
Luc	Lortie	luc.lortie@co stco.com	Please provide more details on current activities to harmonize prior to plan submission and approval. What organisations are involved and what producers are involved. Does your scope of work include jurisdictions outside BC?.	A new organization called Canadian Stewardship Services Alliance Inc. (CSSA) has been established to co-ordinate harmonization activities among the Canadian producer responsibility PPP programs.	Verbal answer during workshop
Maury	McCausland	mmccausland @londondrug s.com	Will streetscape include retail malls for the collection of PPP? How will PPP be collected from store fronts or malls?	The Recycling Regulation requires that producers provide service to 'municipal property that is not industrial, commercial and institutional property'. Retail malls are considered commercial property and are therefore excluded. MMBC will undertake composition audits of the PPP and garbage collected in existing streetscape programs and will implement a pilot project to test a preferred approach to streetscape collection and recycling services.	Verbal answer during workshop
John	Mullinder	jmullinder@p pec- paper.com	What's to stop a retailer using commercial pressure to force a service packaging supplier (of paper/plastics) to pay the retailer's steward fees for the service packaging the retailer chooses to offer consumers?	Commercial terms and relationships among companies in a supply chain are subject to their negotiations and are outside the mandate of MMBC.	Verbal answer during workshop
John	Mullinder	jmullinder@p pec- paper.com	Will the materials to be collected via drop-off depots incur additional fees over and above depot collection costs? They are in depots because they contaminate the curbside materials. If they don't incur "penalty" fees for being collected through depots, why would other materials not lobby to be collected via depot instead of curbside?	Costs will be allocated to producers based on the principles set out in Section 4.10 of the Draft PPP Stewardship Plan.	Verbal answer during workshop

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Appendix A - Webcast Questions, Comments and Responses					
First Name	Last Name	Email	Question/Comment	Response	Response Status
Linda	Ounapuu	lounapuu@colormagazine.ca	RE: Performance Targets -Producers are obligated to recover 75% of PPP from residences and streetscapes within a reasonable period of time. What determines a "reasonable period of time"?	A 'reasonable period of time' is affected by development of recycling end-markets for the collected PPP, establishing processing capacity and capability to process PPP to meet the recycling end-market specifications, and the ability to expand collection systems and educate residents to utilize these systems.	Verbal answer during workshop
chetan	patel	cpatel@kleenflo.com	HDPE bottles will be obligated material under PPP program?	Yes.	Verbal answer during workshop
Richard	Philpot	richardphilpot@shaw.ca	How long, number of years, will the collection contracts be that will be offered local governments and processors?	MMBC has not determined the optimum length of collector contracts.	Verbal answer during workshop
Jeff	Rahn	jeff.rahn@prrd.bc.ca	If a local government declines the market clearing price and MMBC is unable to secure a contractual arrangement for collection, it was indicated that collection of PPP would not happen in the community. If the material is then considered residue for disposal, will MMBC pay the local government to cover its cost for landfilling it?	MMBC is responsible for providing reasonable access to a PPP collection system and achieving a 75% recovery target within a reasonable timeframe. MMBC is responsible for the PPP system and will not pay local governments to manage the garbage system.	Verbal answer during workshop
Peter	Rotheisler	peter.rotheisler@cord.bc.ca	Please explain how you expect the typical arrangement between a municipality that contracts out collection and processing to work.	If the local government accepts the market-clearing price for collection offered by MMBC, the local government can continue to sub-contract to provide these services. Where a local government contracts for processing services, this contract will require, at minimum, modification if MMBC selects the same processor to service the local government through the RFP process and may require termination if MMBC chooses a different processor to service the local government.	Verbal answer during workshop
Kimberly	Shanley	kshanle1@wm.com	(1) Could you expand on the concept of MMBC providing management of collection service customers "through its own means"? (2) And does this mean that the market clearing price will not include any costs for a collector to provide customer service to residents regarding PPP collection?	1. MMBC would manage service delivery via a sub-contractor similar to the way in which local governments currently manage service delivery via a sub-contractor. 2. The market-clearing price will be set to reflect efficient delivery of the collection services. The manner in which a qualified collector provides this service will be set out in the collector qualification standards. Beyond the requirements of this standard and subject to agreements between collectors and processors on the condition of material when accepted by the processor, collectors operate their collection business at their discretion.	Verbal answer during workshop

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Brian	Thompson	brian@recycling.bc.ca	We do have a polystyrene machine, so wondering if we handle the product now are we going to be able part of the program and be reimbursed for the produced product?	MMBC will offer a market-clearing price for depot collection of PS foam. Depending on the activities that occur at the depot, the depot operator may also wish to submit a proposal in response to the RFP for post-collection services. Rather than responding to the RFP directly, the depot operator could choose to collaborate with one or more primary processors to provide local consolidation and transfer services so that the primary processor could include these services in their proposal to MMBC.	Verbal answer during workshop
Chris	Underwood	chris.underwood@vancouver.ca	Given material streams captured in the public realm are typically highly contaminated, as a pilot for the capture of PPP from streetscapes, does MMBC contemplate testing the option of collecting non-source separated materials with that stream then sorted by a processor (for example in a "dirty MRF" - materials recovery facility", if such facility exists in a given jurisdiction).	MMBC has not contemplated the use of a dirty MRF to recover PPP from streetscapes. Rather, MMBC is proposing to implement composition audits of PPP and garbage collected in existing streetscape programs and to implement a pilot project in order to determine its preferred approach to streetscape collection and recycling services.	Verbal answer during workshop
Chris	Underwood	chris.underwood@vancouver.ca	With respect to collection of recycling from multi-family properties, what is contemplated in terms of the management of collection from "mixed use" buildings - properties that contain both multi residential and commercial tenants, when those tenants share recycling infrastructure (containers, etc.).	Where a collector services MF buildings on the same route as non-MF buildings, factors will be applied so that MMBC is responsible only for MF PPP.	Verbal answer during workshop
Chris	Underwood	chris.underwood@vancouver.ca	Please clarify what is meant by "disentangling co-collection systems" (slide 67)	PPP is collected in some jurisdictions in one compartment of a multi-compartment collection vehicle with non-PPP materials in the other compartment (e.g. garbage or organics). This approach is considered co-collection. 'Disentangling co-collection' would occur if MMBC required that PPP be collected in a separate vehicle from organic waste and/or garbage.	Verbal answer during workshop
Chris	Underwood	chris.underwood@vancouver.ca	How does MMBC contemplate enforcement of restrictions with respect to recycling material scavenging from curbside or other more formal collection activities by "unsanctioned" third party collectors (those who don't have collection agreements with MMBC) - activities that are currently regulated via municipal bylaw?	Where MMBC tenders for curbside collection services, it would manage scavenging similar to the way in which local governments currently manage scavenging.	Verbal answer during workshop

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Chris	Underwood	chris.underwood@vancouver.ca	Costs associated with collection of containers and other lightweight packaging materials are driven largely by volume rather than mass (tonnes). Will stratified fees account for changes which impact volume? Re slide 81, will volume data also be collected by MMBC by way of their contracted processors (e.g. volume as a function of number of truck loads, in addition to tonnes)?	The market-clearing prices will take into account volume of the PPP collected and changes to these characteristics will be considered when periodically reviewing and adjusting the market-clearing price. Requiring collectors and processors to report both tonnes and number of loads will be considered.	Verbal answer during workshop
Chris	Underwood	chris.underwood@vancouver.ca	Currently the collection of recycling materials by municipalities from single and multifamily properties occurs on the same collection route. What is the rationale with respect to the different terms for managing collections from these property types, that is, providing first right of refusal for municipalities for single family collection, but not for multifamily collection?	The offer of the MCP for MF buildings is available to local governments and other collectors (all subject to the same collector qualification standards). This approach is proposed because, in some areas, Local governments do not service MF buildings or the MF buildings in the jurisdiction are serviced by a combination of the LG and the private sector. As well, where residents do not set PPP at the curb, the property manager for a MF building, rather than MMBC, should select the collector best able to service the building.	Verbal answer during workshop
Greg	Vandervan	greg.vandervan@amway.com	Will MMBC and MOE use the reported weight from Producers to determine recovery rates, material fees OR.. will they use the Processor's weight at time of processing... In theory, these 'generated weight' figures should be the same BUT will if the Processors are also processing material from ICI generators, it will not.	MMBC will use the quantity of PPP shipped to recycling end-markets as the numerator and the quantity of PPP reported by producers as supplied to residents as the denominator in the 75% recovery calculation.	Verbal answer during workshop
Jamie	Vieira	jvieira@tnrd.ca	Can you please comment on the following scenario: A small municipality provides curbside collection and hauls the material to a regional district run depot. Would both the municipality and the regional district qualify for the market clearing price, one as a collector and one as a depot?	The municipality providing curbside collection would qualify for the market-clearing price offer for curbside collection. The depot receiving the PPP from the curbside collection vehicles would not qualify for the market-clearing price as a depot for the PPP from the curbside collection vehicles as the depot did not receive the PPP delivered by residents. The depot operator may also wish to submit a proposal in response to the RFP for post-collection services or collaborate with one or more primary processors to provide local consolidation and transfer services so that the primary processor could include these services in their proposal to MMBC.	Verbal answer during workshop

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Appendix B – Submissions and Responses

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Local government	<p>The development of a province-wide PPP Extended Producer Responsibility (EPR) program is a complex task. We are pleased that your draft plan addresses some of the issues identified in the UBCM policy paper, including the right of first refusal for local governments to provide curbside and streetscape collection services, the commitment to provision of services in urban and rural areas and the intention of creating measures and incentives for redesigning packaging and printed paper. While your draft plan provides an outline of the proposed program, it lacks detailed information on a number of program components. This information is essential for local governments to make decisions on service delivery. We have a number of questions and comments that we are offering for consideration in the development of your plan prior to submission to the Ministry.</p> <p>Funding -Collection Your plan states that MMBC will offer a financial incentive in the form of a market clearing price to local governments that currently provide curbside collection services for PPP. It is yet to be determined whether this price will be a flat rate per tonne or per household serviced or some combination. It is also unclear whether different prices will be offered in different geographical areas of BC. We ask that MMBC provide more detailed information in their plan about their proposed market clearing price methodology.</p> <p>Funding - PPP EPR Materials That End Up in Local Government Waste Streams The intent of the BC Recycling Regulation is to make producers responsible for 100% of packaging and printed paper waste. As expressed in the UBCM policy paper, we believe this obligation extends to PPP that ends up in local government waste streams. We ask that MMBC commit in the plan that as a minimum local governments will be compensated for managing the residential PPP materials that end up in local government waste streams. This will also provide an incentive for producers of problem packaging to change the design of their products.</p> <p>Service Levels Our Board supports the UBCM recommendation for an equitable level of service between urban and rural areas. Your draft plan notes that you will provide reasonable access to collection in all areas; however, there is no detailed information on how this will be achieved. We ask that MMBC provide more information in their plan regarding</p>	<p>Funding – Collection: Research into current collection costs is required prior to determining the basis for the market-clearing price and circumstances that are cost drivers.</p> <p>Funding - PPP EPR Materials That End Up in Local Government Waste Streams: MMBC is responsible for implementing a program that recovers 75% of PPP.</p> <p>Service Levels: MMBC is proposing to collect a broad list of recyclable materials consistently in all collection systems. MMBC is proposing to provide PPP curbside collection to households currently receiving curbside garbage collection service where this service can be provided for the market-clearing price offered by MMBC. Both of these initiatives will increase service levels. MMBC anticipates that offering a financial incentive for depot and multi-family building collection will also increase these services.</p> <p>Multi Family Service: MMBC has taken this approach to multi-family building collection because there is a wide spectrum of collection service delivery models for MF buildings in BC. In some areas the local government provides the service, while in others local governments are not involved and commercial collection is provided to MF buildings. The proposed approach is intended to allow for all forms of MF building collection activities to continue. In most jurisdictions, MF buildings are considered commercial properties for the purposes of garbage collection because MF buildings generally require garbage collection services that can be tailored to each building's specific needs (such as size of the complex, access, available space, etc.). In these circumstances, the building manager or strata council makes the determination as to what service best suits their needs. Similarly, the MMBC plan is intended to provide each MF building with the flexibility to determine how a PPP collection service will be provided, similar to how the CRD currently supports recycling in multi-family buildings. To achieve a 75% diversion rate of residential PPP, recycling performance levels at MF buildings will need to be improved significantly beyond</p>	<p>No revision to PPP Stewardship Plan; to be considered during implementation</p>

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	<p>how they plan to ensure equitable level of service in rural areas. It is also unclear on how MMBC will ensure that areas which are currently being serviced by a depot system (local government or private) will have access to the PPP program in the event depot operators in those areas refuse the market clearing price offered by MMBC. Will MMBC service these areas through a Request for Proposal? We are pleased that MMBC seeks to provide a seamless transition for local governments with established PPP collection programs and is committed to maintaining existing service levels. We ask that MMBC identify in their plan how they are planning to exceed service levels in the future.</p> <p>Multi Family Service Your plan separates collection from multi-family dwellings into buildings that place material at the curb and buildings with collection containers on their private property. Many haulers currently integrate collection from multi-family and businesses in one vehicle on the same route. Your plan does not give local governments the right of first refusal to collect from multi-family dwellings that they are currently servicing, either at the curb or on private property. We ask that MMBC reconsider this option in their plan.</p> <p>Recovery Rate Your draft plan commits to a recovery rate of 75% as stipulated in the BC Recycling Regulation within a reasonable time amount of time. We ask that MMBC commit to a recovery rate of 75% for each regional district to ensure an equitable level of service throughout the province. We also ask that MMBC apply this target rate to specific material categories as supported in the UBCM policy paper and identify a detailed timeline for achieving their goal. We recommend that MMBC add the draft list of PPP to be collected under PPP stewardship program as an appendix to the plan.</p> <p>Streetscape Recycling In your current draft plan, local governments will be given the right of first refusal on streetscape collection in communities with populations of over 20,000. This is an issue for smaller local governments and those with high seasonal populations or tourist visitors. We ask that MMBC change their plan to provide streetscape recycling within all municipalities, regardless of size, that currently operate municipal streetscape garbage collection services. That would be consistent with your goal to provide a seamless transition and maintain existing levels of service.</p> <p>Collector/Processor Relationship</p>	<p>current levels. It is anticipated that by providing a financial incentive to a wide range of potential collectors and by allowing collection services to be tailored to the specific needs of each MF building, performance levels can and will increase.</p> <p>Recovery Rate: MMBC is not able to calculate a recovery rate for each regional district as it will not have information on the quantity of PPP supplied within a regional district.</p> <p>Streetscape Recycling: MMBC will consider your suggestion following the streetscape pilot project and determination of an effective streetscape collection system.</p> <p>Collector/Processor Relationship: Processors will be qualified in part on bid prices and bid prices are to include post-collection costs which are based on knowing the locations and circumstances of collectors.</p> <p>Dispute Resolution: Collectors and processors are able to establish relationships with one another. These relationships are expected to be established, on a prospective basis, as processors respond to the post-collection RFP and prepare their bids for PPP collected. A processor and collector may establish mutually agreeable terms that would take effect should the processor be selected by MMBC to provide post-collection services for the PPP collected by the collector.</p> <p>Arrangements could include dispute resolution mechanisms.</p> <p>Consultation: MMBC will continue to dialogue with local governments while preparing to implement the PPP Stewardship Plan.</p>	

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	<p>Your plan proposes to qualify collectors prior to processors. This approach creates uncertainty and risk for local governments that want to provide collection services as their cost estimates will be based on assumptions about the proximity and availability of processors. It may be preferable to qualify processors first. There is a lack of clarity in your plan about the relationship between collectors and processors. We ask that MMBC provide a clearer definition of post-collection services in their plan and outline a qualification system that will enable both collectors and processors to make informed business decisions.</p> <p>Dispute Resolution The draft plan currently outlines a dispute resolution process for MMBC with collectors and processors. We ask that MMBC add a dispute resolution process between collectors and processors as there is potential for conflict, for example, with respect to the level of contamination. There also needs to be an enhanced dispute resolution process for local governments if they believe that MMBC does not provide adequate service levels, as recommended in the UBCM policy paper.</p> <p>Consultation The UBCM policy paper asks 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. We commend MMBC on engaging stakeholders to date; however, the timelines have been too tight to brief our elected officials. We ask MMBC to consult with local government about reasonable consultation timelines and incorporate these timelines into their planning process. We also recommend that MMBC include local government representatives on their board.</p>		
Local government	<p>We are a small island community of approximately 4000 full-time residents. We have had for many years a very successful source separated recycling facility to which residents deliver their recycled materials. Many of these materials are currently covered under EPR regulations or the mandatory exclusion regulations of Metro Vancouver solid waste management.</p> <p>Our recycling depot is staffed by volunteers on a 5 1/2 hour per day, 5 days per week basis. The volunteers act as educators and help with the sorting. The increase in volume of recycling happening presently, with more in the future is creating stresses in our volunteer system of management. We really need a paid supervisor. All our garbage and recyclables are delivered to various processing sites on the mainland which adds significantly to our waste management costs. Our current waste collection and delivery contract costs the municipality \$560 for each 40yd bin of recyclables, and we deliver approximately 110 bins per year. Our waste stream, or better stated, our resource</p>	Thank you for contacting MMBC. A member of the MMBC project team will call you to discuss your PPP services.	No revision to PPP Stewardship Plan

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	stream is, because of its specific source separation, very clean and needs no further processing. This facilitates the work of organizations that will handle materials down the line. I was at the Coast Waste Management meeting in Victoria recently where the MMBC plan was discussed, so I am somewhat familiar with the plan. Our municipality would like to be considered in any future development of the plan. We are in the process of redesigning our waste management plan, so any information that is available as to how MMBC's plans might affect us would be very helpful.		
Local government	Understanding that MMBC will be conducting research over the next couple months in order to set the financial incentive for local governments to take on a collection role, the Village wishes to submit a draft budget to this process. It is hoped that this information will help MMBC in their research and give a realistic view of the costs of such a program to local governments. Please see the following sheet for the provisional budget.	Thank you for the information provided.	No revision to PPP Stewardship Plan

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Local government	<p>1. The 'market clearing price' should offer flexibility for population density. Collection costs are affected by regional and local issues such as population density, socio-economic makeup, weather & road conditions, terrain, service method, as well as fuel and labour costs. Some municipalities are a blend of urban and rural developments in varying degrees. Travel distance and terrain are significant contributing costs to collection and therefore a regional pricing structure needs to be created rather than simply dollars per tonne or dollars per household. Moreover, the dollars per household scenario does not incentivize increasing collection weights and leaves open the option of minimal collection since there is no per capita minimum being required. For collectors the idea of having a one size fits all price does not reflect a fair comparative pricing option for rural and less dense communities if they cannot charge their customers to offset the increased collection costs. The economies of scale achieved by dense urban communities will not be seen in rural counterparts. Since producers make material purchases on a dollars per ton basis in the commodity market it is expected that the recovery of recyclables paid to MMBC will follow similar structure (as it is mentioned in the plan that minimizing PPP weight via redesigning products would be a goal for producers in their efforts to minimize cost/maximize profits). A similar fee would be desirable for collectors as pricing would incentivize efficient collection. However, if the price is set too low, incumbent collectors in smaller communities may elect not to continue and the community may be left without recycling collection.</p> <p>To ensure this plan is fair and not economically disruptive, the pricing for smaller communities should be based on tonnages produced and population density.</p> <p>2. The plan should include the 75% recovery with 100% coverage across the province. The plan should state whether all communities would be assured collection. All communities should have a collection option; be it curbside or depot. All consumers will be paying for the PPP recovery via purchase price and all consumers should have an option to have their recyclables recovered. Barriers to recovery include contamination, recycling disposition, and access; the contamination and recycling disposition factors can be addressed by collectors and producers through education, promotion/advertisement, and product redesign, but not if there is no recycling option for the consumer. A recovery level of 75% will be difficult to achieve without including all parties. There needs to be a minimum level of service provided to residents outlined in the plan.</p> <p>Additionally, the plan needs to outline how the 75% diversion will be calculated. Will it be a province-wide average or will the system in each community be required to reach a</p>	<p>1. Research into collection costs will take circumstances, such as population density, into consideration. As setting the market-clearing price based only on households "leaves open the option of minimal collection", MMBC will also consider payment per tonne or a blended method of payment.</p> <p>2. The plan proposes reasonable access criteria that are intended to provide reasonable service across the province. MMBC is not able to calculate a recovery rate for each regional district as it will not have information on the quantity of PPP supplied within a regional district or within a city.</p> <p>3. MMBC needs to confirm the quantity of PPP supplied, collected and recycled before it can estimate the time required to recovery 75% of PPP supplied.</p> <p>4. The by-law that took effect in April 2012 should remain in effect so that multi-family residents and multi-family property managers utilize the collection services that are available from their local government or private sector companies. MMBC has taken this approach to multi-family building collection because there is a wide spectrum of collection service delivery models for MF buildings in BC. In some areas the local government provides the service, while in others local governments are not involved and commercial collection is provided to MF buildings. The proposed approach is intended to allow for all forms of MF building collection activities to continue. In most jurisdictions, MF buildings are considered commercial properties for the purposes of garbage collection because MF buildings generally require garbage collection services that can be tailored to each building's specific needs (such as size of the complex, access, available space, etc.). In these circumstances, the building manager or strata council makes the determination as to what service best suits their needs. Similarly, the MMBC plan is intended to provide each MF building with the flexibility to determine how a PPP collection service will be provided. To achieve a 75% diversion rate of residential PPP, recycling performance levels at MF buildings will need to be improved significantly beyond current levels. It is anticipated that by providing a financial incentive to a wide range of potential collectors and by allowing collection services to be tailored to the specific needs of each MF building, performance</p>	No revision to PPP Stewardship Plan; to be considered during implementation

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	<p>75% diversion. The City of Kamloops prefers the latter as it ensures that our residents will be receiving the same level of service as those in larger cities.</p> <p>3. The plan needs to have a specific date for achieving the 75% recovery rate.</p> <p>4. The Plan should treat multi-family buildings similarly to “curbside” collection, with first right of refusal to local governments where service currently exists. In Kamloops, all single family dwellings and multi-family residences are required to have an on-site recycling option. In April of this year a bylaw was passed requiring multi-family residences to have a recycling service and single family dwellings have required it since 2008. Reverting on multi-family recycling participation could also increase garbage disposed, which impede our ability to achieve our target of 0.3 tonnes landfilled per capita by 2020 (50% reduction). There needs to be a guarantee (first right of refusal) for existing collectors in the multi-family sector similar to SFD collection. We do not support the draft plan’s proposal for multi-family buildings where containers and/or bins are collected on private property. Differentiating the properties may be the best option for eliminating the relatively higher contamination rates of multi-family from the single family stream, but in a plan which advocates collection efficiencies it does not add up.</p> <p>5. All communications need to be consistent and simple to achieve greater participation in recycling.</p> <p>6. Further questions for consideration: -Will all costs of collection and processing be paid by the producers, even in remote communities with significant transportation costs? -What support will be given to local governments in removing glass from existing single stream collection? How would this transition occur? -Will aggregate data satisfy the requirement for providing household, streetscape, and depot tonnage? Our existing fleet collects numerous waste streams through one truck. -When will commercial PPP be addressed? How will mixed use buildings be treated within this plan?</p>	<p>levels can and will increase.</p> <p>5. Agreed.</p> <p>6. Transportation is part of the post-collection services and will be included in the RFP for these services. MMBC will link local governments that have effectively removed glass from curbside collection programs to local governments that wish to do so. As market-clearing prices may differ for curbside collection, depot collection and streetscape collection, it will be necessary to develop a mechanism to separate tonnages for purposes of invoicing. The MOE has indicated it will consider ICI PPP at some point in the future. Where collection routes include residential and ICI, a mechanism will be required to identify the residential PPP to ensure that MMBC is paying only for the residential PPP.</p>	

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Local government	<p>1. Page 7. Re: the financial incentives to local governments (i.e., market-clearing price). Will this be a one-size fits all approach for a local government or will there be an opportunity to customize the price as municipalities have different characteristics i.e. topography, etc.</p> <p>2. If the municipality has an existing contract with a contractor, e.g., to collect multi-family recycling, would MMBC buy out the contract with the contractor if one already existed with the municipality? How would that work?</p> <p>3. What happens if first the local government declines an offer to collect (e.g. because of a too low incentive) and then it goes out to tender and nobody applies. Would MMBC then go back to the local government with another price (to start this process again to find a collector?).</p> <p>4. If a local government accepts an offer for collection services. How long would this offer/contract be good for? Would it be short-term (1-2 years) or longer term (3+ years).</p> <p>5. Page #5 - bullet points. Perhaps you need to include a bullet point "Public sector depot", as that hasn't been included along with Private and Not-for-Profit depots.</p>	<p>1. The intention is to offer a standardized market-clearing price for curbside collection, multi-family building collection depot collection. We may identify, during our research into collection costs, circumstances that may result in a number of market-clearing prices but it will not be specific to each local government. 2. MMBC will not 'buy out' a contract. In the case of multi-family building collection service, MMBC will offer a market-clearing price financial incentive and either the local government can accept the offer and continue to sub-contract the service or the private company can accept the offer from MMBC. 3. Should the local government decline the offer, MMBC will tender for the collection service and will deliver the service where the bid price is equal to or lower than the market-clearing price offer for collection services. As companies are typically looking for opportunity to grow their businesses, MMBC anticipates responses to the tender for PPP curbside collection services. Should MMBC receive no bids, MMBC will investigate the reasons for the lack of response. 4. The term for a collector agreement has not been established. 5. The reference to 'collection services' in the first two bullets includes both curbside and depot collection.</p>	<p>No revision to PPP Stewardship Plan; to be considered during implementation</p>
Local government	<p>I would recommend that glass should not be included in the curbside collection for the PPP and should be collected at depots.</p> <p>Where will the pilot project for streetscapes be done? Will it be one area or a number of areas?</p> <p>In the Prince George area the responsibility for solid waste lies with the Regional District. in the City of Prince George the collection of solid waste is done by the City. Would the MMBC come to the City to ask if they would be willing to provide the PPP collection or would they contact the Regional District first?</p>	<p>Thank you for your comment on the collection of glass. A location for the streetscape collection pilot project will be selected during the implementation phase. MMBC would offer the market-clearing price to provide PPP curbside collection service to the local government that is providing the curbside collection service for garbage.</p>	<p>Method of collecting glass and streetscape collection location to be considered during implementation</p>

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Local government	<p>The plan has many strengths. We support the intention to give local governments flexibility by offering first right of refusal for collection services. We value MMBC's commitment to enhance resident service levels. We also welcome the expanded list of recyclables, the requirement for producers of non-recyclable PPP to invest in R&D for recycling solutions, and the attention given to communications. However, we have some serious concerns that we feel must be addressed in order to protect the public interest and ensure success for this program.</p> <p>Municipalities require more time to evaluate the next version of the plan. While we understand the need for MMBC to submit a plan to the ministry by the November 19th deadline, the details of the plan and the time provided for consultation and discussion (3 weeks) do not permit us to adequately evaluate this very complex proposal, or to report to Council. When MMBC submits the revised and final plan to the ministry in 2013, we ask that you allow at least eight weeks of consultation from the day it is released to the public. This would give local governments the time needed to undertake a thorough review to determine how the plan will affect the public, and report to their councils.</p> <p>Minimum collection service levels must be defined in the plan. Public recycling infrastructure and service levels have developed over 20 years, and residents now rely on consistent, clear and coordinated services. Although the draft plan commits to providing residents with reasonable access to collection, "reasonable" is not defined. The plan must therefore set minimum agreed-upon service levels, and these service levels must be applied consistently to all collectors - local governments, private companies and MMBC's contractors. The market clearing price offer must be based on benchmark service levels. This is the only way that local governments can make cost comparisons and make a decision on whether to accept the market clearing price and continue to provide service.</p> <p>A more logical procurement process for securing collectors and processors is needed. The proposed framework for procuring collectors and processors transfers unacceptable risk to local government in our obligation to tax payers. Local governments are being asked to evaluate the market clearing price without knowing critical factors like the location, capacity, sorting technologies and material quality specifications of processors. These variables drive the collection technology, operational risk and overall system costs.</p> <p>The framework does not allow for procurement practices which mitigate public risk. The draft plan proposes that processors will approach local governments to develop bids in response to MMBC's RFP for processing. We do not see how it would be possible for us</p>	<p>MMBC will post the PPP Stewardship Plan after submission to the MOE on November 19 and will continue to accept and consider comments to December 14, 2012. Should an updated plan be submitted in January 2013, this version will also be posted. MMBC will continue to dialogue with local governments on operational details while preparing for implementation.</p> <p>Section 5.2 sets out criteria for reasonable access. The market-clearing price will be offered for a defined collection service delivered in compliance with collector qualification standards.</p> <p>The RFP for post-collection services will ask primary processors for bid prices to accept PPP collected by a qualified collector delivering the defined collection service in compliance with collector qualification standards. MMBC will be undertaking the bid process to select a processor, not a local government. Collectors may collaborate with multiple processors to mitigate the risk that MMBC will select a processor with whom the collector has not partnered. MMBC will review the market-clearing price methodology and prices with stakeholders. Your local government can continue to provide multi-family building collection services. Local governments that service multi-family buildings through utility pricing can accept MMBC's financial incentive offer and use the incentive to offset the fee charged. With this change in financing, property managers should see an economic benefit to recycling. Collector qualification standards will require that the collection service be provided at no cost to the resident.</p>	<p>Footnote added in Section 4.4 to indicate that MMBC will work with the local government to mitigate confusion for residents where PPP collection service is provided by MMBC and garbage collection service is provided by the local government.</p>

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	<p>to conduct an open, transparent bidding process to partner with a processor within these constraints if we choose to provide collection services. There is no guarantee that collectors will secure a processor through MMBC's RFP for processing. For example, there is a risk that collectors may partner with a processor whose bid is not chosen by MMBC. A more thorough risk assessment must be completed to identify and develop contingencies for unintended loopholes.</p> <p>Stakeholder consultation is required on the market clearing price formula.</p> <p>We support the stratification of the market clearing price, but there are many variables to consider beyond fuel and material recycled that account for localized collection costs. We recommend that these variables be determined through consultation with stake holders including existing service providers.</p> <p>The plan must include a commitment to work cooperatively with local governments where MMBC tenders its own service providers for curbside collection.</p> <p>Where local governments decide to transition the collection service to MMBC, it is in the public's best interest for the two parties to work cooperatively to select a service provider who will effectively coordinate collection with municipal garbage and organics collection schedules and provide a similar or enhanced level of service.</p> <p>The multi-family buildings require a more thoughtful plan.</p> <p>The plan proposes that multi-family buildings that store recycling carts on private property would be required to arrange recycling on a building-by-building basis. This would effectively dismantle the centralized recyclables collection system Vancouver introduced to all multifamily buildings in 1999, a system which serves a customer base in over 160,000 dwelling units. With no provision in the plan to ensure mandatory participation, there is significant risk that multi-family residents' access to recycling may be reduced. Furthermore the sustainability issues related to multiple collectors is a significant risk. In the City of Vancouver, the location of carts has no bearing on whether a building receives the city's recycling service. Over 4,000 of the 5,000 multi-family buildings in Vancouver store their carts on private property, a practice which the City actively promotes. There are no controls in the draft PPP plan to ensure that recyclable collectors are provided free of charge to multi-family residents.</p> <p>The plan must address broader sustainability objectives.</p> <p>The above multi-family building issues illustrate where the draft PPP plan may be at cross purposes with other sustainability objectives. Transforming a centralized collection system to a building-by-building system would likely result in many more trucks on the roads, increasing greenhouse gas, air and congestion emissions. We believe the plan should drive to a coherent, sustainable collection system.</p>		

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	<p>A date is required for achieving the 75% recovery target. The draft plan states that MMBC is committed to delivering the 75% recovery target required in the Recycling Regulation "within a reasonable time." While we recognize that it will take time to collect enough data to establish an accurate baseline, the plan must at least commit to setting a target date by the end of the third year of this five-year plan. Independently audited, annual financial reports must be produced. It is in the public's interest for MMBC to publish independently audited financial statements, even if the Recycling Regulation exempts it from doing so because eco-fees would not be shown on consumer receipts. The City of Vancouver operates a solid waste utility for recycling, and is transparent about revenues and costs. This level of transparency must be transferred to the PPP EPR program, whose revenues and expenditures are expected to be in the order of \$80 million.</p>		
Local government	<p>Background: I'm the Waste Management Coordinator for the Columbia Shuswap Regional District (CSRD) and responsible for the operations of 4 landfills, 8 transfer stations, a reload facility which accepts curbside collected mixed recycling, and 20 mixed recycling depot bins.</p> <p>Can you please provide clarity on the following questions:</p> <p>1) as the operator of a reload facility (we accept comingled recyclables, collected via the Salmon Arm curbside collection program), the material is compacted and shipped to Cascades for processing. - Are we a collector or processor?</p> <p>2) We have a member municipality in our Regional District that currently offers neither curbside garbage nor recycling pick up. What steps do you envision being available to this local government should they decide to implement a curbside program by May 2014 ie is it better to wait until 2014 or is there an incentive to have something in place sooner to facilitate an offer from MMBC?</p> <p>3) If everything goes as planned and the stars align for May 2014 roll out, how do you envision the handling of existing contracts that local governments may be tied to. For example we have an agreement with Emterra until December 2014 to provide the servicing (hauling) and processing of our depot collection system throughout the CSRD. If the market clearing price is established by MMBC and is less than what we are currently paying Emterra via the existing contract, what, if any, options are there for the CSRD to abandon the contract, as the products being collected will be the responsibility of MMBC.</p>	<p>1) If your reload operation ships to a processor (such as Cascades) rather than recycling end-markets, you are not a primary processor and would not respond to the RFP for post-collection services. However, your reload operation provides consolidation and transfer, which are types of post-collection services. You can collaborate with one or more primary processors as they develop their submission and bid price. 2) As residents living in the municipality do not currently receive either garbage or PPP curbside collection services, they would be serviced by depot rather than curbside. 3) If you decline the market-clearing price offer from MMBC for depot collection, you could continue to provide depot collection without financial assistance from MMBC or you could close your depot and terminate the agreement with Emterra to manage the PPP from your depots.</p>	No revision to PPP Stewardship Plan; to be considered during implementation

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Local government	The following questions come to mind after reviewing the draft Plan and participating in the consultation workshop: 1) If a local government is providing a curbside service for PPP but locked into a long term agreement will they be compensated at the market clearing price (MCP) and is there the opportunity to opt out when their existing contracts end? 2) Is MMBC committed to providing depot service to every existing Columbia Shuswap Regional District (CSR D) depot? 3) Will MMBC police/enforce the use of depots? For example CSR D depots are used heavily by the commercial/business sector. 4) How will the CSR D be compensated for PPP that ends up in the landfill? 5) Where a local government is not currently operating curbside pickup of PPP or garbage, will there be an opportunity to partner with MMBC to deliver a curbside program? 6) Where a local government chooses to opt out of a curbside program and nobody submits a proposal and/or the submitted prices exceeds the MCP, how will MMBC ensure that local government receives the same level of service? 7) It is important that the following be included in the "financial incentive" for the operation of a depot: snow removal costs; sanding and salting costs; rent/lease of space; management fees (attendant to deal with calling for service, picking up illegal dumping, etc.); signage; and education. 8) I trust the MCP will be regionally based, to have one flat fee for the Province would be completely inappropriate for BC. 9) The target of 75% recovery must be regionally based i.e. from Regional District to Regional District. 10) It's clear to me that MMBC will be establishing MCP for collectors and processors. Will MMBC also be developing MCP for Post Collection Services including consolidating, transferring, etc.?	1) 1) The term of the agreement between MMBC and a local government that accepts the market-clearing price offer has not been determined. However, contractual agreements typically have mechanisms for termination by either party. 2) MMBC will offer a market-clearing price to depot operators that are able to comply with the depot collector qualification standards. These standards will be developed over the next few months and we can then assess whether CSR D depot s will comply with the standards. 3) MMBC is only responsible for residential PPP. Depot operators will receive the market-clearing price for PPP received from residents, not from businesses. 4) The Recycling Regulation requires that MMBC achieve a 75% recovery target within a reasonable period of time. PPP that remains in the garbage stream is the responsibility of the local government. 5) MMBC is proposing to offer a market-clearing price for curbside collection of PPP only where PPP or garbage is currently collected at curbside. Expansion of curbside collection services for PPP beyond these areas will be considered over time but is not proposed to be part of the program when it launches in May 2014. 6) As companies are typically looking for opportunity to grow their businesses, MMBC anticipate responses to the tender for PPP curbside collection services. Should MMBC receive no bids, MMBC will investigate the reasons for the lack of response. 7) Thank you for the comment. 8) MMBC will undertake research into existing PPP collection costs before determining the degree of differentiation of market-clearing prices. 9) The Recycling Regulation specifies a 75% recovery target which is considered a provincial target. MMBC does not have information on the quantity of PPP supplied to residents by regional district and is therefore unable to calculate a recovery rate by regional district. 10) MMBC is proposing to issue a request for proposals for post-collection services which include consolidation and transfer.	No revision to PPP Stewardship Plan; to be considered during implementation
Local government	I've noted in the document "Draft List of PPP to be Collected under the PPP Stewardship Program" the disclaimer stating "This list will be predicated on the existence of recycling end-markets for each material on the list." As the viability of end-markets for many of these materials is subject to economic influences, how will "recycling end-market" be defined during plan implementation?	Demand for PPP and the associated commodity value may fluctuate due to economic influences. However, recycling end-markets typically continue to operate even under poor economic conditions. The capacity and viability of a recycling end-market will be considered before a material is added to the list of PPP to be collected.	No revision to PPP Stewardship Plan; to be considered during implementation

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Local government	<ul style="list-style-type: none"> • We would like to see the market clearing price for curbside collection consider all costs incurred by local governments to provide the service (e.g. administration, infrastructure including drop off points or transfer stations, automated collection where applicable, and to consider the geography and home density- especially for rural and unincorporated areas etc.) • We would like to see local governments have first right of refusal on providing depot service and multi-family collection. • We would like to see there be flexibility in the curbside collection program to maintain existing number of materials (eg. film plastic). • We would also like to clarify whether the market clearing price for curbside collection will include the loading of transport trailers at local government transfer station drop points. • We hope that additional consideration will be given to First Nations consultation. 	<ul style="list-style-type: none"> • The market clearing price, where accepted by local government is intended to offset the cost to deliver the collection service as well as administration, capital and promotion/education associated with the collection of PPP. Research into collection costs for purposes of setting the market-clearing price for curbside collection will consider the curbside collection services, including the circumstances such as population density. The market-clearing price for curbside collection will not include consolidation and transfer as these activities will be included in the RFP for post-collection services. • Depot service and multi-family building collection services are currently provided by local governments, not-for-profit organizations and private companies. The market-clearing price will be offered to both types of service providers. • Thank you for your comment regarding collection of plastic film. • The market-clearing price for curbside collection will include unloading of collection vehicles. Consolidation and transfer activities will be included in the RFP for post-collection services. • MMBC is meeting with First Nations communities as part of its ongoing consultation activities. 	No revision to PPP Stewardship Plan; to be considered during implementation
Local government	<p>Inadequate Compensation Concerns</p> <ul style="list-style-type: none"> • Municipalities that provide an integrated curbside collection program for both single-family and multi-family homes may not receive compensation to continue the multi-family portion of collection. • Municipalities that currently provide a depot option may also not receive adequate compensation for this service. • The “market clearing price” referred to in the draft Plan may not reflect local government’s true operating costs. Local government must be adequately consulted on the formula for calculating compensation. • An enhanced dispute resolution process is required to ensure that local government receives payment for impacted costs if producers do not provide adequate service levels, or if the “market clearing price” is inadequate. <p>Disposal of Residual PPP Concerns</p> <ul style="list-style-type: none"> • There is no mention of any compensation for local government for the management of PPP materials that end up in local government waste streams. • There is no commitment regarding the disposal method of residuals, but there is a commitment to recover energy. Therefore, it is clear that MMBC intends to send residual material to an incinerator to be used as fuel. This is a clear disincentive for producers to 	<p>Inadequate Compensation Concerns: Municipalities can consider the market-clearing price offer for both curbside collection (where single-family home and multi-unit homes place PPP at the curb) and for multi-family buildings (where residents in multi-family buildings take PPP to a central storage location). Market-clearing prices will be set to reflect an efficiently operated collection service. Disposal of Residual PPP Concerns: MMBC is responsible for the PPP collection system. PPP that remains in the garbage stream is the responsibility of local governments. MMBC has indicated that it will target PPP for which there are recycling end-markets in the collection system. Therefore, only processing residues will be directed to energy recovery or disposal. As 'recover material or energy from the product' comes before 'dispose' in the pollution prevention hierarchy, MMBC has indicated in Section 5.4 that processors will be encouraged to further process system residues to meet recovery end-market requirements before relying on disposal to manage system residues. MMBC has not used the term 'depressed recycling market'. Inadequate Service Concerns: MMBC has indicated that effort is required to develop an</p>	No revision to PPP Stewardship Plan; to be considered during implementation

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	<p>modify the design of their product. Also, it is a disincentive to conduct proper public outreach, as the more residual material they collect, the more fuel they can sell. Finally, as all PPP in the province will be trucked down to markets in Vancouver for incineration, emissions from this incineration will pollute our sensitive air shed.</p> <ul style="list-style-type: none"> • MMBC’s definition of a “depressed recycling market” is troublesome and staff are concerned they may use this excuse to divert more residual material to be used as fuel for an incinerator. <p>Inadequate Service Concerns</p> <ul style="list-style-type: none"> • Street collection of PPP materials will not be provided or funded by MMBC for communities with populations of less than 20,000. This is an obvious negative impact for smaller communities, especially those that have high seasonal populations due to tourism. The provision or funding of street collection should be available to all communities regardless of size. • Wording in the draft Plan around service to rural areas is inadequate, vague and confusing. Staff have concerns that the resulting service will be not be equitable. This means that rural consumers will be paying for the program through their purchase of the product but will not be able to partake. <p>Local Government Participation Concerns</p> <ul style="list-style-type: none"> • Staff are concerned about the draft “collector qualification standards” and how this will affect local governments that are currently only collecting garbage, but may want to branch out into blue bag recycling. <p>Performance Concerns</p> <ul style="list-style-type: none"> • There is no mention of performance measures or how the program will be enforced. • There is no mention of how MMBC will work with producers to bring about the collection of ICI PPP. • If, as MMBC states, it does not have enough data to apply material-specific recovery categories; the Plan needs to be revised to account for how MMBC will acquire that data and how it will work toward implementing this reporting mechanism in the future. 	<p>effective streetscape collection system. The proposed criteria for streetscape capture 28 municipalities. MMBC is proposing to expand curbside collection of PPP to households currently receiving garbage collection services and to offer financial incentives to collectors willing to service multi-family buildings and operate depots without qualification by geographic location. Local government Participation Concerns: Section 5.5 describes the program elements that MMBC is proposing to measure. ICI PPP is not included in Schedule 5 at this time. Section 5.1 describes the data that will be compiled during the first years of the program to refine the baseline recycling rate and to compile data on the quantity of PPP material types being supplied, collected and recycled.</p>	

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Local government	<p>Metro Vancouver staff and staff from member municipalities recognize the critical importance of this Product Stewardship Plan for Packaging and Printed Paper (PPP), and support developing a plan that is viable and sustainable. We congratulate Multi-Material BC (MMBC) on its recent efforts to engage local government and other stakeholders, as well as the development of the Draft PPP Product Stewardship Plan. We support the general direction of the plan, and appreciate the resources assigned to this process to ensure the development and implementation of the plan occurs within the timelines established in the Recycling Regulation. In particular, the strengths of the existing plan include the intention to not disrupt the existing recycling system, the expansion and harmonization of PPP to be collected province-wide in 2014, and the approach to address and phase-in PPP that is currently not recyclable.</p> <p>Although there has been much progress achieved over the last several weeks, there are several key issues in the proposed plan which must be addressed before Metro Vancouver and member municipalities can consider supporting the plan in its entirety. We do not support the current path that MMBC has selected for the collection of PPP from multi-family residences. The plan has arbitrarily separated collection into buildings that place material at the curb, and buildings which require ingress onto private property. Much of the multi-family collection within Metro Vancouver either through city collection or contracted haulers, occurs on integrated routes where single-family and multi-family (both curbside and on private property) materials are collected within the same vehicle at the same time.</p> <p>We do not support the qualification of collectors prior to the qualification of processors. The availability and proximity of qualified processors will have direct impacts on the collector's ability to determine the acceptability of the market clearing price. The proposed approach shifts an unacceptable amount of risk to local governments, creating uncertainty regarding the location and availability of qualified processors in determining their collection costs. We also recommend that MMBC develop a consultation plan for determining the market clearing price. More clarity is required regarding how the relationships between collectors and processors are expected to unfold within the context of MMBCs RFP process for post-collection services. Concerns remain regarding the level of certainty that collectors will have in securing stable processing services. We believe more work is required to identify possible issues that may arise (e.g., contamination levels), and develop provisions to mitigate them. As well, the Plan needs to specify how MMBC intends to work with local government who opt out of the program to select a service provider to collect PPP, and coordinate service delivery with garbage and organics collection schedules.</p>	<p>MMBC has taken this approach to multi-family building collection because there is a wide spectrum of collection service delivery models for MF buildings in BC. In some areas the local government provides the service, while in others local governments are not involved and commercial collection is provided to MF buildings. The proposed approach is intended to allow for all forms of MF building collection activities to continue. In most jurisdictions, MF buildings are considered commercial properties for the purposes of garbage collection because MF buildings generally require garbage collection services that can be tailored to each building's specific needs (such as size of the complex, access, available space, etc.). In these circumstances, the building manager or strata council makes the determination as to what service best suits their needs. Similarly, the MMBC plan is intended to provide each MF building with the flexibility to determine how a PPP collection service will be provided. To achieve a 75% diversion rate of residential PPP, recycling performance levels at MF buildings will need to be improved significantly beyond current levels. It is anticipated that by providing a financial incentive to a wide range of potential collectors and by allowing collection services to be tailored to the specific needs of each MF building, performance levels can and will increase. As MMBC will offer a market-clearing price for curbside collection and a market-clearing price for multi-family building collection, a mechanism will be required to identify the quantities collected from each source where they are collected on the same route. Processors will be qualified in part on bid prices and bid prices are to include post-collection costs which are based on knowing the locations and circumstances of collectors. The RFP for post-collection services will ask primary processors for bid prices to accept PPP collected by a qualified collector delivering the defined collection service in compliance with collector qualification standards. MMBC will be undertaking the bid process to select a processor, not a local government. Collectors may collaborate with multiple processors to mitigate the risk that MMBC will select a processor with whom the collector has not partnered. MMBC will review the market-clearing price methodology and prices with stakeholders. MMBC will work with the local government to mitigate confusion for residents where PPP</p>	No revision to PPP Stewardship Plan; to be considered during implementation

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	<p>To ensure transparency and accountability, we feel it is essential that the plan to commit to publishing audited annual financial reports. Open and accessible financial reporting reinforces the credibility of the Program and in its recycling efforts.</p> <p>Finally, the attached table includes the principles, issues and concerns that were previously submitted in 2011, and have been recast to read as recommendations for specific sections of the Plan.</p> <p>While the issues identified above are currently ill-defined in the Plan, Metro Vancouver and member municipalities are committed to continue to engage with MMBC to create a plan which is workable for all parties.</p> <p>In an effort to ensure that this plan is successful, member municipalities in Metro Vancouver require 60 days, after the release of the 'Submission Draft' to fully vet the Plan through the various business units (e.g., operations, purchasing, legal, etc...) prior to making a final submission. Also please note that local government will require 90 days after the release of the market clearing price to analyse the implications for their operations, report out to their elected officials, and receive direction regarding making a final decision whether to accept it or opt-out. Throughout this process, we recommend that MMBC, perhaps in collaboration with local governments, undertake a public consultation process with residents (as opposed to the prior stakeholder consultation).</p>	<p>collection service is provided by MMBC and garbage collection service is provided by the local government.</p>	
Local government	<ol style="list-style-type: none"> 1. Please don't include glass and styrofoam in curbside collection 2. Please continue to allow curbside collection of film plastics like plastic bags. Perhaps requiring them to be bagged. 3. It is hard to comment on plan without knowing the Market Clearing Price. 4.the District via a contractor collects recyclables curbside bi weekly from about 9800 homes at \$1.37/home/month. We also collect in our own split bin trucks Kitchen Wastes weekly and garbage bi weekly 	<ol style="list-style-type: none"> 1. Thank you for your comments on curbside collection of glass and PS foam. 2. Thank you for your comment on curbside collection of bagged film plastics. 3. MMBC will be undertaking research on collection costs in Quarter 1, 2013 in order to set the market-clearing price. This information will be available to stakeholders for comment at that time. 4. Thank you for the information. 	No revision to PPP Stewardship Plan; to be considered during implementation
Local government	<p>Questions</p> <ol style="list-style-type: none"> 1. As the cost of the recycling of this material is being placed on producers, how will the new rules be enforced? In other words, how are the producers going to be made accountable to help make this program work? 2. How will the producers of PPP materials be held accountable to the standards set forth by this plan? Will the role of enforcement lie with the Ministry of Environment (MOE) or MMBC? How is this enforcement structured? 3. With respect to the Market Clearing Price, has a cut-off cost been established for tenders or will the bids of the actual tenders be what decides the MCP? In other words, could MMBC declare a point where the cost is too prohibitive to get a program running in 	<ol style="list-style-type: none"> 1. MMBC is developing the PPP Stewardship Plan on behalf of producers that choose to be its members to meet their obligations under the Recycling Regulation. Producers that do not choose to be MMBC members are obligated under the Recycling Regulation to submit their own plan. 2. The MOE is responsible for enforcing the Recycling Regulation. 3. The market-clearing price offered for curbside collection will reflect costs to deliver the curbside collection service, administer the service and provide public education to support the service. It is expected that tender prices will be equal to or lower than the portion of the market-clearing price that represents the cost to 	No revision to PPP Stewardship Plan; to be considered during implementation

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	<p>a Regional District/ Rural area/ Municipality?</p> <p>4. The respective frame work for financial reimbursements to a regional district is unclear. See below as an example:</p> <p>a. The PRRD has several manned transfer stations offering segregated waste disposal and drop-off of paper, plastics and foil for recycling. We have a long term contract with a company to OPERATE the stations and HAUL both garbage and recyclables to the applicable sites (a MRF or landfill). We understand that a MCP and subsequent RFP will target the transfer only of the recyclables to the nearest MRF. As we have a contract with the Company that covers off everything to do with the stations, how does MMBC plan on compensating the PRRD for the collection and transfer of the recyclables?</p> <p>5. This is a two-part set of questions regarding cross-border interactions. Given that the PRRD and certain other regional districts share a border with Alberta: a. Is it understood by MMBC and MOE that many MRF's, such as those in the PRRD, will likely utilize the closest brokers for plastics/cardboard/etc. which may be just over the border and therefore more practical to deal with regarding trucking costs? This conceivably constitutes a financial incentive to get MRF companies on board with the new program. b. Transfer stations, such as those in the PRRD are seeing customers from Alberta. Will the new plan incorporate a method for tracking the recyclables coming in from out of province? 6. With respect to those communities that have curbside garbage pick-up, we understand that a tender would be put out by MMBC for curbside recycling as well. Should no bidders respond to this tender, is there a back-up plan? 7. How specifically does the relationship work between Collector and Processor?</p> <p>8. Will the MMBC plan have to be rolled into the Solid Waste Management Plans of each district?</p> <p>9. What is the minimum service to be expected for curbside pick-up of residential recyclables?</p> <p>10. The PRRD has a contract with a MRF to provide recycling depots to certain areas in the region. These depots are predominantly public access but, in the case of a transfer station, may see residential AND commercial materials collected. Some of the depots are located at a couple of schools. How will the plan affect the contracts in place?</p> <p>11. It was understood that a bidder, as part of an RFP, would be supplying the system (i.e. carts or totes) for curbside collection of recyclables: is this still the case?</p> <p>Comments:</p> <p>1. Market Clearing Prices absolutely must reflect regional economies, especially in regards to trucking costs (i.e. No one singular price for the entire province). PRRD has</p>	<p>deliver the curbside collection service. 4. The market-clearing price will be offered for the operation of the depots. The RFP will provide an opportunity for you or your contractor to collaborate with primary processors to provide consolidation and transfer services for PPP as part of the processor's bid. The processor would then contract with you or your contractor for these services. 5. It is understood that processing facilities and recycling end-markets may be located out-of-province. Collectors will be required to report the source of PPP so that MMBC can ensure it is responsible only for PPP generated by BC residents. 6. The local government providing curbside garbage collection will initially be offered the market clearing price to provide curbside collection of PPP. If the local government declines the offer, then MMBC may issue an RFP for collection services. As companies are typically looking for opportunity to grow their businesses, MMBC anticipate responses to the tender for PPP curbside collection services. Should MMBC receive no bids, MMBC will investigate the reasons for the lack of response. 7. A processor planning to bid on PPP from a given collector may establish mutually agreeable terms with the collector that would take effect if the processor wins the MMBC bid. Arrangements could include, but are not limited to: service assurance; material quality; consolidation, transfer, freight arrangements; payments for services outside of MMBC's scope of service such as management of ICI PPP; premiums for specific material quality achieved; and, dispute resolution mechanisms separate from MMBC's dispute resolution process. 8. MMBC cannot comment on regional government waste management plans. Please refer the question to the MOE. 9. Collection services will be defined during development of the qualification standards. 10. If you accept the market-clearing price offer for depot operation, you can continue to contract for these services, using the market-clearing price to offset the payments to its contractor. For depots that collect both residential and commercial materials, a factor will be applied so that MMBC's market clearing price can be applied to the residential portion. 11. Where MMBC tenders for curbside collection of PPP, provision of collection containers would be included in the services. Re comments: 1. The market-clearing price is for collection services only. Consolidation and transfer are included in</p>	

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	<p>several municipalities located upwards of 70-100 km apart, interspersed with many rural communities. The closest major municipality is 120km outside the district (Grande Prairie, Alberta with approximately 60,000 people). Typically Eco-Depot style recyclers will be shipping materials for processing down south or into Alberta. Trucking something back and forth in our area is quite costly and must be reflected in the MCP. 2. The logistics of ICI vs. residential materials needs to be addressed. In this region, the recycle depots see an approx. ratio of 30% residential/70% ICI recycled materials. Since MMBC and MoE are only addressing the residential side of things, what is the mechanism for tracking this material? It is inadvisable for a recycling firm to separate residential and ICI generated materials as this would constitute an unnecessary additional cost on their part that would have to be offset. MRF's rely on sorting by product, not by source.</p> <p>3. While we realize that the DRAFT plan is being put forward to the Ministry, MOE needs to weigh in on what their role is in this enterprise. We did not hear from them in the webcast, though pointed questions and comments were directed that only they could answer.. MRF's have indicated that glass pick-up is better controlled at their primary facilities, rather than as a curbside item, to get away from contamination. Recycle Depots in our area have not set-up glass collection at their unmanned depots for this very reason. MMBC should take this into consideration when addressing curbside recycling pick-up.</p>	<p>the post-collection RFP and costs for these activities will not be included in the market-clearing price. 2. We appreciate the challenges distinguishing between residential and ICI PPP. However, there are operating examples of programs that apply factors to ensure that producers that are obligated for residential PPP are, in fact, paying only for the residential portion of collected PPP.</p>	
Local government	<p>Some questions:</p> <p>1. As posted during the webcast, I asked a question about Municipal autonomy within regional districts. Given my understanding that RDs are responsible for garbage collection within rural Areas, and for maintaining a landfill for the entire RD, but given that municipalities within that RD are responsible for contracting for the garbage pickup within their jurisdiction, can municipalities either opt out of the MMBC 'plan' and/or can they 'out-source' their participation within the MMBC 'plan' to an existing private enterprise Depot operating within their jurisdiction?</p> <p>The reason I ask this question is that, here in Gibsons, we enjoy one of the most advanced Depots in the province which concurrently operates both privately -- with styrofoam processing, glass crushing and EPR products -- and under contract with the RD for both the Town of Gibsons and the contiguous rural Areas on each side. And, one month ago, this Depot began curbside pickup of recyclables, by individual subscription, using all-electric vehicles.</p> <p>Should the Town of Gibsons wish to consider entering into a P3 partnership arrangement with this Depot, chances are that whatever MMBC's 'market price' becomes in the future there would be less cost overruns incurred to be absorbed by additional</p>	<p>1. MMBC will offer a market-clearing price for depot operation that will be available to any qualified collector, whether a local governments or a private company. In your case, the local government could accept the market-clearing price offer for depot operation and contract with your local depot operator or your local depot operator could accept the offer from MMBC. However, each tonne of PPP from your community would be eligible for the market-clearing price only once - either through the local government or through the private depot operator. 2. MMBC has no comment on the SAIC report. 3. The PPP Stewardship Plan includes a number of options: a market-clearing price offer to local government for curbside collection of PPP from households that are currently receiving PPP or garbage curbside collection; and a market-clearing price for depot operation available to either local governments, not-for-profit organizations or private companies. I believe these options address all of the ways in which service are currently being provided within your jurisdiction.</p>	<p>No revision to PPP Stewardship Plan; to be considered during implementation</p>

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	<p>taxes.</p> <p>2. Having recently read the Executive Summary of the SAIC Report (Sep 2012), sponsored by the Grocery Manufacturer's Association in the US, I have my doubts that EPR and, by extension, PPP, can achieve what is currently claimed. I would be interested in MMBC's reaction to this SAIC Report.</p> <p>3. Given the dispersion of our Sunshine Coast Regional District, with ~30,000 residents spread over 70-odd km of two-lane 'highway', and the existence of 3 different 'models' of recycling, I have doubts whether a "one size fits all" model can induce adaptation by these 3. At the far end of the RD, there is a non-profit society running a recycling depot and the RD subsidizes both this operation and a small landfill. Garbage pickup is by subscription, not tax-funded. In the middle of our RD, the District of Sechelt contracts for garbage pickup and also for a limited stream curbside pickup of recyclables. Whereas, centered on Gibsons, the south Coast has the Gibsons Recycling Depot referred to earlier, in question # 1, which services a combined population of ~ 11,000 residents. I am concerned that there was not sufficient detail within the MMBC presentation to clarify just how the MMBC 'plan' could be adapted to these 3 different examples of current recycling activity on the Sunshine Coast.</p>		

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Local government	<p>In general, it appears (on the surface) that MMBC is making progress and have identified a framework to base a program on, however the lack of details in the plan make it very difficult to provide specific feedback. Below is the specific feedback that I was able to provide.</p> <ol style="list-style-type: none"> 1. The list of items not considered packaging needs to be vastly expanded and an explanation provided for why each category or item has been excluded. The exclusion of wood is not clear to me. Wood is a significant component in packaging that goes to the household in particular it is often used for transport and protection purposes. Please explain its exclusion. 2. Municipal property requires a much more detailed definition with numerous examples of those areas included and excluded. There are many grey areas in this category and a proper inventory is required. 3. Within the program principles the focus on outcomes, not process is very concerning and explains why there are still so many outstanding issues and unanswered question. A much greater focus on process is required to avoid issues. 4. A Market Clearing Price structure is required. 5. The definition and contract relationships between MMBC and collectors was clear to me but the definition and relationship between MMBC and processors was not clear. Is a local government the contracts our processing to a private company considered a processor or not? The definition of processors needs to be tightened up and the relationship between local governments, private processors and MMBC needs to be clearly explained based on several scenarios. <p>There are many other questions and points of feedback that are provided by Metro Vancouver and the UBCM group that I agree with and didn't feel the need to comment on. I think a revised, more detailed draft plan is required and should be circulated for comment before the plan goes to the Ministry for review.</p>	<p>1. Wood has been excluded for a number of reasons: it is not a common method of packaging household products; where wood is used, it is transport packaging and is often removed by the delivery agent; wood is not included in PPP collection programs. 2. We are not trying to define 'municipal property'. Rather we are defining 'municipal property that is not industrial, commercial or institution' which is a term used in the Recycling Regulation. 3. The reference to 'focus on outcomes, not process' describes MMBC's interest in program performance rather than dictating to collectors and processors exactly how to achieve those outcomes. 4. MMBC will undertake research into collection costs in order to establish market clearing prices. The data compiled during the research will determine the structure. 5. A local government that currently contracts for processing services is not considered a primary processor. A local government that owns a processing facility would be considered a primary processor.</p>	<p>Revised Section 4.1 to clarify how PPP processing services are provided to avoid misinterpretation that a local government that currently contracts for processing services would be considered a primary processor</p>
Local government	<p>1. Draft Plan General Comments/Questions</p> <ul style="list-style-type: none"> • The draft Plan does not currently provide any consideration or benefit to the development or promotion of local jobs in BC and Canada. The promotion and development of local (BC or Canada) processing and end-use markets should be identified as a priority of the Plan. • It was indicated during the webinar on October 29, 2012 that MMBC was proposing to determine the qualified collectors prior to issuing an RFP to processors. It is extremely important/integral for local governments, contractors or depot operators who will be collecting PPP as qualified collectors to know where they will be delivering the collected PPP to determine if the market-clearing price offered by MMBC is acceptable or not. It is 	<p>1. The PPP Stewardship Plan was designed to meet the requirements of the Recycling Regulation. Post-collection activities include receiving PPP from collection vehicles and picking up PPP from depots. The market-clearing price will be offered for a defined collection service delivered in compliance with collector qualification standards. Local governments that decline the market-clearing price offer may respond to MMBC's tender for curbside collection services at any subsequent point. 2. Section 3: As the draft list of PPP to be collected is expected to expand over time, it is not appropriate to include this operational detail in the plan submitted for approval. Section 3.1: The phrase</p>	<p>No revision to PPP Stewardship Plan; to be considered during implementation</p>

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	<p>not clear in the draft Plan whether the costs for delivery of collected PPP to processors will be covered by the incentive (market-clearing price) offered to local governments, contractors or depot operators. This financial issue and payment methodology needs to be better defined in the draft Plan.</p> <ul style="list-style-type: none"> It was indicated during the webinar on October 29, 2012 that the established market-clearing prices will be offered to local governments only once and if not accepted will never be offered again. Given the extremely tight time lines on implementation of this program, it is not reasonable to expect that all local governments will be able to effectively evaluate the acceptability of the market-clearing price offered by MMBC and as such may turn down the offer to ensure that their taxpayers are not subsidizing the program. Also, should there be service issues with qualified collectors chosen by MMBC, there should be an option for local government to become involved in service provision. <p>2. Draft Plan Detailed Comments/Questions – Broken Down by Section Section 3. Packaging and Printed Paper</p> <ul style="list-style-type: none"> The draft examples of packaging and printed paper products to be collected under the MMBC program (currently separate documents not included in the draft Plan) should be included in the draft Plan. It is understood that MMBC would like flexibility at this point during Plan development to allow for detailed planning to occur following Plan approval by the MOE, however the types of materials to be collected under the program and methodologies of collection are fundamental to the Plan and should be clearly defined in the approved Plan. <p>Section 3.1 Packaging</p> <ul style="list-style-type: none"> With reference to footnote No. 4 where it is stated “While producers of packaging described in section 3.1 are responsible for contributing to the cost of providing reasonable access and achieving a 75% recovery rate, only those types of packaging for which there are viable commodity markets and recycling end markets are proposed to be collected from residents at program launch in May 2014” – What is meant by “viable commodity markets”? From this statement it seems that the intention of MMBC is to focus only on the collection of materials that are the most cost effective and not all packaging. Will the less cost effective materials be collected at some point in the future? Please explain. Reference section (c) Transportation, distribution or tertiary packaging that goes to the household. <p>o The plan states that transportation packaging that goes home with the consumer is included, but “transportation or distribution packaging that is not intended primarily for use or management in the home” is excluded. Could you please further define “for use or</p>	<p>“viable commodity markets” has been removed leaving “recycling end-markets”. As noted above, MMBC expects to expand the list of recyclable commodities over time to include materials not currently considered recyclable. The phrase “that is not intended primarily for use or management in the home” is intended to refer to packaging that is expected to remain with the transporter or retailer. Producers will not pay fees on “packaging components and ancillary elements” as these are not considered packaging. If these items remain with PPP when collected, they will be recycled if recyclable and disposed if they are not recyclable. Section 4.3: These documents are operational and not subject to MOE approval. Each agreement with a collector will define the specific collection services to be provided, including the geographic area and population to be serviced. Section 4.4: November 19, 2012. With the addition of Schedule 5 to the Recycling Regulation in May 2011, both producers and local governments have been on notice that responsibility for PPP services will transfer from local governments to producers and the form of this transfer of responsibility would be set out in a plan to be submitted to the MOE in November 2012. The reasonable access criteria set out in Section 5.2 maintain current service levels for households receiving curbside collection of PPP and propose to expand curbside collection of PPP to households receiving curbside collection of garbage where they can be serviced for the market-clearing price offered by MMBC. Expansion of curbside collection services for PPP beyond these areas will be considered over time but is not proposed to be part of the program when it launches in May 2014. On behalf of its producers, MMBC is responsible for meeting the requirements of the Recycling Regulation in the most effective and efficient manner. Local governments are not required to deliver PPP services and can decline both to provide the service and to accept MMBC’s market-clearing price offer. MMBC will review the market-clearing price methodology and prices with stakeholders. The market-clearing price will reflect efficient delivery of the service. This may or may not reflect the costs currently incurred. As companies are typically looking for opportunity to grow their businesses, MMBC anticipates responses to the tender for PPP curbside collection services. Should MMBC receive no bids, MMBC will investigate the reasons for the lack</p>	

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	<p>management in the home”? It would also be beneficial to provide more examples of the types of transportation and distribution packaging that are not included.</p> <ul style="list-style-type: none"> • Reference section (e) Packaging components and ancillary elements integrated into packaging, including ancillary elements directly hung or attached to a product. <ul style="list-style-type: none"> o The examples of these packaging components provided are mascara brushes and brushes contained in the lid of corrective liquid paper. How does MMBC predict that these items will be received by processors – would they need to be cleaned out? In this case, many households may choose not to participate in recycling those specific materials due to the inconvenience of preparing them for collection and processing. Section 4.3 Packaging and Printed Paper Program Delivery Overview • MMBC should include the documents “draft List of PPP to be Collected Under PPP Stewardship Program” and “Packaging and Printed Paper for Purposes of Producer Reporting and Obligation” in the draft Plan for comment and approval. These documents should not be separate from the Plan that is ultimately approved by the Ministry of Environment. • With reference to the statement in the draft Plan “An agreement between MMBC and each service provider setting out the activities to be performed and the outcomes to be achieved” <ul style="list-style-type: none"> o Will each agreement have differing circumstances and outcomes to be achieved depending on geographical area and population served? Section 4.4 Collection of Packaging and Printed Paper from Residents and Streetscapes • “The approach to delivery of PPP collection services is based on providing opportunity for those involved in the collection of PPP today to be part of the PPP collection system when producers assume responsibility for the PPP recovery system in May 2014.” <ul style="list-style-type: none"> o What specific date is meant by “today”? o Many rural based local governments have been in the process of developing PPP programs (curbside and/or depot) or are at various stages of implementation of PPP programs. When the BC MoE indicated the “intention” to include PPP in the Recycling Regulation in 2009 (On October 29, 2009, the Council of Ministers approved a Canada-wide Action Plan for Extended Producer Responsibility and a Canada-wide Strategy for Sustainable Packaging), many local governments slowed or ceased the implementation of PPP programs to wait to see how to effectively and cooperatively transition to industry led programs. The draft Plan wording indicates that MMBC is only concerned with providing an opportunity for those collecting PPP today to be a part of the collection system in May 2014. This is not acceptable and is disingenuous to Regional Districts and local governments that have waited in an effort to streamline and assist the 	<p>of response. The statement Encouraging initiatives to reduce costs where costs exceed the market-clearing price” does not reference incentives. Research into current collection costs will consider the circumstances for the cost, including geographic challenges and population density. Where these are identified as cost drivers, the market-clearing prices will be set accordingly. Transport, processing and shipment to markets are not part of the collection market-clearing price. These services will be part of the post-collection RFP. Section 4.5 Post-Collection: Market-clearing prices for multi-family building collection and depot collection are available to any interested collector that complies with the collector qualification standards. The qualification standards are intended to deliver consistent service performance and are not intended to favour one company over another. Section 4.7 Dispute Resolution: As MMBC is responsible for delivering the service to the resident, MMBC is responsible for managing the dispute. Local governments are not required to deliver PPP services and can decline both to provide the service and to accept MMBC’s market-clearing price offer. If the local government has accepted the market-clearing price and has executed a contract with MMBC as a collector, the dispute resolution process described in Section 4.7 applies. MMBC will be consulting with governance experts to ensure that the program is overseen by directors who are well versed in necessary core competencies and their fiduciary responsibilities. Advisory committees to support the directors will be considered during implementation. Section 4.8 Communications: The communications plan is intended to be ongoing. The words` (first year following launch)` were intended to refer to the first version of the communications plan and have been removed to avoid misunderstanding. As stated, the communications plan will be developed following plan approval. The first principle references understanding resident audiences and the fifth principle references a mix of communication and promotion/education tactics. Section 4.9 Administration of the Packaging and Printed Paper Stewardship Plan: Where a company can provide administration services using established best practices, hiring this company would be a more effective method of quickly adopting best practices, compared to hiring</p>	

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	<p>transition process. The draft Plan wording indicates that if PPP programs are not in existence today, MMBC has no intention of developing and implementing programs in those areas unless it is at cost levels MMBC deems acceptable. It is not appropriate nor acceptable for MMBC to treat those areas of the province that have not initiated PPP programs differently from areas of the province that have currently operating programs. This is also completely in contradiction to other statements within the draft Plan that discuss fair and equitable treatment for rural and urban areas of BC. MMBC producer members sell products to all areas of the province and their consumer base should not be differentially treated. It is recommended and formally requested that the wording associated with reasonable access for single-family households and multi-family households (currently on page 19 of the draft Plan) have the qualifier “that can be serviced for the market-clearing price offered by MMBC” be removed. This change would result in the following: “Reasonable Access to Collection Services for PPP will be provided:</p> <p>§ For single-family households through</p> <ul style="list-style-type: none"> • Curbside collection in areas currently receiving curbside collection of PPP, • Curbside collection in areas currently receiving curbside collection of garbage, • Depot collection for PPP in areas currently receiving depot collection of PPP or in areas where residents are required to self-haul garbage to a waste management facility (landfill or transfer station); <p>§ For multi-family household through</p> <ul style="list-style-type: none"> • Curbside collection for PPP where the PPP is placed on public easements for collection on regular single-family curbside routes; • Collection services from multi-family dwellings where set-out of PPP is on private property; <p>§ For streetscapes, subject to proof of concept through testing effective delivery of streetscape collection system, through collection (all three conditions below must apply)</p> <ul style="list-style-type: none"> • In urban commercial areas with business activities that generate large amounts of PPP; • Where the local government operates a litter collection system; and • In municipalities with a population of 20,000 or more and a population density of 200 or more people per square kilometre.” <p>o What happens after May 2014? The draft Plan does not adequately address how MMBC is going to allow for continued improvement of the program or encourage the development of new innovative programs.</p> <ul style="list-style-type: none"> • The proposed explanation by MMBC for the determination of a suitable incentive or market-clearing price is not of sufficient detail to provide confidence that MMBC is 	<p>and training staff which take many years to achieve the same level of competency.</p> <p>Section 4.10 Program Financing: MMBC will develop a cost allocation methodology in consultation with producers. The Recycling Regulation does not establish a de minimis for small businesses. All PPP producers are obligated, notwithstanding the quantity of PPP they supply to residents. It is anticipated that MMBC will consider the appropriate balance of administrative burden when establishing the reporting requirements and fee obligations for producers. The quantity of magazines available for collection will be assessed as part of the waste composition audits. If magazines are kept by residents, fewer will be included in collection systems and collection and processing costs will be allocated to magazines accordingly. Section 5.1 Recovery Target: By using the quantity of PPP recycled or recovered in the numerator, MMBC is excluding processing residues that are disposed from the calculation. The amount available for collection is equal to the amount generated. The time required to develop a dataset in which MMBC has confidence depends on the level of accuracy in the data reported by producers, collectors and processors and the associated validation and verification process. This cannot be predicted until the data are compiled and reviewed. The reasonable access criteria set out in Section 5.2 maintain current service levels for households receiving curbside collection of PPP and propose to expand curbside collection of PPP to households receiving curbside collection of garbage where they can be serviced for the market-clearing price offered by MMBC. Delivering more collection services is not proposed as an indicator of program performance. Participation is the number of residents using a collection system while capture is the proportion of their available PPP that is placed into the PPP collection system. The PPP Stewardship Plan describes MMBC’s approach to the residential PPP collection and recycling system. Section 5.5 sets out the proposed program performance indicators. MMBC does not have sufficient data on which to base targets by material at this time. Section 5.2 Accessibility: MMBC has not used the term “unreasonable access” and cannot provide a definition. MMBC is proposed to maintain current service levels for curbside collection as indicated in</p>	

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	<p>committed or will be able to provide fair and equitable service levels across the province of BC. The intention behind the BC Recycling Regulation is to encourage and require industry to pay for 100% of the costs for collection and recycling services. As currently proposed in the draft Plan, industry is allowed to determine what are acceptable collection costs. This is inherently in opposition to the 100% user pay principle. The current draft Plan wording suggests that should MMBC determine that the acceptable cost of service is below the actual cost, that the local government taxpayers are to supplement the cost to ensure products do not wind up in the landfill.</p> <ul style="list-style-type: none"> • MMBC needs to provide wording in the draft Plan indicating that it will consult and cooperate in a meaningful way with local governments, non-profits, local businesses in establishing suitable and appropriate market clearing prices for all areas of the Province of BC that adequately cover 100% of the actual costs. • Where the local government or First Nation government declines the offer or where there is no current collection service provided by the local government AND there have been no responses to the tender issued by MMBC, what will happen? It can be hoped that this won't happen, but it is necessary for MMBC to have a "Plan B" and this plan should be identified in the draft Stewardship Plan. \ • "Encouraging initiatives to reduce costs where costs exceed the market-clearing price" <ul style="list-style-type: none"> o Could MMBC please clarify this statement, perhaps providing examples of potential incentives? o What happens if actual costs exceed the market-clearing price because of geographic challenges or low populations – how can solutions for these issues be reached with incentives? • Will different market-clearing prices be offered in different geographical areas of BC? Costs for collection, transport, processing and shipment to markets will be exponentially higher in rural and northern parts of the province. To ensure equitable service levels throughout BC, it is recommended that MMBC ensure such considerations when establishing market-clearing prices. <p>Section 4.5 Post-Collection</p> <ul style="list-style-type: none"> • When considering expressions of interest, proposals or tenders from PPP collectors and processors, will MMBC recognize the value of locally established businesses in the services and benefits that they provide to communities over the ability to serve the area below the market clearing price? • The processor qualification standards and evaluation criteria must include considerations for sustainability, energy efficiency, and the ability to hire locally before 	<p>the first sub-bullet which does not include the phrase `which can be serviced for the market-clearing price offered by MMBC`. This phrase is applied to households that receive garbage curbside service but do not currently receive PPP curbside service so that MMBC can determine whether these households would be better served by curbside or by depots. Similarly, this phrase is applied to depot collection households so that MMBC can determine appropriate locations for depots. Section 5.5 Reporting: Collectors will be required to report the number of households receiving curbside or multi-family building collection service. Households serviced by depots can be estimated. 3. Summary of Major Issues/Concerns with Draft Plan and Proposed Solutions Issue/Concern with Draft Plan: 1. MMBC has indicated that it will continue to dialogue with stakeholders during implementation. Section 4.7 describes the dispute resolution process and indicates that the process will be set out in commercial agreements with collectors and processors. 2. The term is specified in the Recycling Regulation. 3. The PPP Stewardship Plan proposes to expand service levels and expand the list of PPP collected to increase the recovery rate above the current estimate4d 50% to 57%.</p>	

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	<p>price.</p> <p>Section 4.7 Dispute Resolution</p> <ul style="list-style-type: none"> • The Plan indicates that if there is a dispute involving a resident that the path of resolution ends with the involvement of the MMBC Board. What if after the involvement of the MMBC Board, the issue is still unresolved to the satisfaction of the resident? What steps are to be taken in this scenario or is the intent of MMBC to hold the final say with respect to complaints from residents? This dispute resolution path requires additional options and MMBC should not end with the MMBC Board. • What is not clear from the table presented on Page 12 of the draft Plan is what the dispute resolution process is for a local government that does not agree with the Market Clearing Price offered or suggested by MMBC as being acceptable for service provision? A clear dispute resolution process for this scenario should be included in the plan and it should be a fair process. • Further to the above, MMBC should commit in the Plan to ongoing dialogue and meaningful consultation with local governments and other stakeholders to address concerns with Plan implementation. As the draft Plan wording at this time leaves significant room for interpretation, there should be a clearly defined process that MMBC commits to providing to address local government concerns. It is recommended that MMBC consider providing a minimum of three seats on their Board of Directors for local government representatives (one urban representative, one rural representative and one northern representative). Another option would be to consider the establishment of a “Local Government Oversight Committee” that would include representatives from MMBC and local government (northern, rural and urban) that would directly address local government concerns/issues with Plan implementation. <p>Section 4.8 Communications</p> <ul style="list-style-type: none"> • “The communication and P&E plan will comprise three activity phases: pre-launch, launch and post-launch (first year following launch).” <ul style="list-style-type: none"> o The “post-launch” communication and P&E plan should be ongoing through the entire PPP program. How does MMBC propose to improve the communication plan over the entire 5 year term of the stewardship Plan? As the draft Plan document is currently worded, MMBC has no obligations or commitments for continuance after the first year following launch. o Although stated in the draft Plan that the communications plan will be evaluated periodically using various key performance metrics (a couple of examples are provided), there is insufficient detail in how often the evaluations will occur or what the key metrics 		

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	<p>are to provide meaningful comment. This section needs to be drastically improved to provide sufficient detail to allow stakeholders to adequately comment on the proposed communication plan.</p> <ul style="list-style-type: none"> • The communication plan should consider the fact that different strategies work in different areas. AKA the plan should not be “one size fits all”. Social media may be a very effective tool in the lower mainland and Vancouver Island, but is not as heavily used in more rural areas of the province. <p>Section 4.9 Administration of the Packaging and Printed Paper Stewardship Plan</p> <ul style="list-style-type: none"> • “Activities to be administered through out-sourcing include those that will not compromise the relationship between MMBC and BC stakeholders and where effectiveness and efficiency is enhanced through the adoption of best practices delivered by the service provider that would otherwise be a multi-year stabilization and continuous improvement effort for MMBC.” o Please clarify this sentence so it is more easily understood. <p>Section 4.10 Program Financing</p> <ul style="list-style-type: none"> • Producers will pay fees that are intended to cover an equitable share of MMBC administration costs. o How will MMBC ensure that producers are paying for exactly the amount of PPP they bring into BC? What about very small producers? • When considering cost allocation, MMBC should consider the lifespan of different PPP materials. For example, magazines are not recycled as often as newspapers - many people keep collections of magazines for years. <p>Section 5.1 Recovery Target</p> <ul style="list-style-type: none"> • In the glossary section of the draft Plan (Appendix A) Recovery Rate is defined as “calculated as a percentage with the numerator representing the quantity of PPP recycled or recovered and the denominator representing the quantity of PPP available for collection. In Part 1 of the Recycling Regulation – Definitions, recovery rate is defined as follows: “recovery rate” means the amount of product collected divided by the amount of product generated, expressed as a percentage. Why has MMBC proposed different wording for the Recovery Rate definition? One could argue that there could be significant differences in the denominator value by changing the wording to “quantity of PPP available for collection” from the “amount of product generated”. Depending on the interpretation of the wording, the “quantity of PPP available for collection” could be less than the “amount of product generated”. This in turn would artificially increase the calculated Recovery Rate. This proposed change in wording should be explained in full by MMBC 		

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	<p>before the MoE should consider approving the draft Plan.</p> <ul style="list-style-type: none"> • It is stated in the draft Plan that “During the first years of implementation of the PPP stewardship plan, MMBC will be compiling data from producers on the quantity of PPP material supplied to residents and from service providers on the quantity of PPP materials collected and marketed to recycling end-markets. Audits to identify the composition of collected and marketed PPP will be required to determine the quantity of each type of PPP material being recycled. These data will allow MMBC to refine the baseline estimated recycling rate range of 50% to 57% and to compile, over the first years of program implementation, data on the quantity of PPP material types being supplied, collected and recycled”. The above statement is tied to the completion of audits which will include a sampling protocol that will involve a sufficient number of samples and sample points over multiple seasons and years to be considered reasonably statistically valid. The vagueness regarding the number of years it will take MMBC to accurately quantify the “recycling rate” to allow for appropriate comparison to the required 75% recovery rate is not accepted as a measurement of program performance. MMBC should commit to the collection of required data for the statistically valid determination of the recovery rate over a set period of time. • Further in this section MMBC indicates that additional recovery will involve: <ul style="list-style-type: none"> o Delivering more collection services – how is this proposed and over what period of time? If this is being included as an indicator of program performance, then greater detail is required. o Increasing participation by encouraging residents to utilize available collection systems. This is virtually the same concept that is contained in the fifth bullet point - Increasing capture rates by encouraging residents to place PPP in the PPP collection system rather than the garbage collection system. • The draft Plan document states on page 18 that “MMBC is committed to building the residential PPP collection and recycling system in BC to deliver the required 75% recovery target within a reasonable time and within the framework of the pollution prevention hierarchy”. Given the importance of the PPP program to all areas of BC and the implications to local governments, business, non-profits and producers alike, MMBC should provide details on how it is committed and provide clear and distinct goals and objectives and timelines for implementation. The current draft Plan does not provide sufficient detail. • Recovery rates should be broken down by material type so that success can be measured more accurately. It will be easy to encourage residents to recycle paper because it is already widely recycled. Is the 50-57% of PPP currently recovered mostly 		

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	<p>paper? MMBC must be able to determine how much plastic/packaging is being collected to measure the effectiveness of program implementation. This would also help to identify where communication and education efforts should be improved/targeted.</p> <p>Section 5.2 Accessibility</p> <ul style="list-style-type: none"> • What does MMBC consider as “unreasonable access”? • Current wording in the Plan for single-family households (curbside and depot) indicates that “reasonable” service levels are linked to what MMBC determines as acceptable costs (MCP). The current wording in this section implies that services to residents currently receiving curbside garbage collection or depot collection for PPP will only be provided by MMBC if the costs do not exceed the MCP. This is not an acceptable approach for the definition of “reasonable access” and should be amended. Please refer to Section 4.4 comments (above) where recommended wording changes to the draft Plan are requested. <p>Section 5.5 Reporting</p> <ul style="list-style-type: none"> • Accessibility indicators should be reported on minimum at a Regional District level. This will allow for an effective review of service provision and comparison to operational effectiveness indicators such as tonnes of PPP collected and kilograms per capita of PPP collected which are proposed to be reported on a Regional District level. • For transparency’s sake, third-party audited financial statements should be reported annually regardless of whether or not is it required by the Ministry of Environment. <p>3. Summary of Major Issues/Concerns with Draft Plan and Proposed Solutions</p> <p>Issue/Concern with Draft Plan Proposed Solution</p> <p>1. The draft Plan does not contain enough detail to allow for adequate or reasonable comment. This vagueness is not to the advantage of local governments, stakeholders, producers being asked to sign on, and the Ministry of Environment who is ultimately responsible for enforcement of the requirements under the Recycling Regulation. MMBC should commit in the Plan to further formal and meaningful consultation with all stakeholders that will be impacted by the implementation of the Plan. Further, MMBC should commit to and provide details for a comprehensive dispute resolution process that will effectively deal with stakeholder concerns during Plan implementation.</p> <p>2. There is no term associated with the draft Plan. It is a requirement under the BC Recycling Regulation that Stewardship Plans are to be for a maximum of a 5 year term (from the date of approval by the Director). Identify a maximum of 5 year term (from the date of approval by the Director) for the Plan. Include an additional statement that MMBC is committed to working with all stakeholders for the successful implementation of the Plan.</p> <p>3. The draft Plan lays out a path of how MMBC is going to take over the existing PPP</p>		

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	<p>collection programs, which as stated in the draft Plan, is only going to potentially achieve a recovery rate of 50-57%, which is well below the required 75% under the requirements of the Recycling Regulation.</p> <p>The draft Plan should be amended to provide adequate details, including a timeline of events that MMBC is committed to implementing that will allow for the achievement of a 75% recovery target over a reasonable time frame.</p>		
Local government	<p>The Regional District of Fraser-Fort George (RDFFG) is appreciative of the opportunity to provide input on your Draft Packaging and Printed Paper (PPP) Stewardship Plan. Given the aggressive timeline for commenting and the inability of our Board of Directors to convene prior to the submission deadline, I am providing comments based on current Board policy and positions with respect to Extended Producer Responsibility (EPR). The Board will have an opportunity to review the draft Plan in the near future and if there is additional information that our Board would like to share with Multi-Material British Columbia (MMBC) we will do so.</p> <p>As a member of the Union of British Columbia Municipalities (UBCM), the RDFFG considered the UBCM Packaging and Printed Paper Product Stewardship Paper at its September 20th, 2012 Regular Board meeting. At this meeting the Board endorsed the recommendations contained in the UBCM Policy Paper. We recognize that some of the recommendations identified in the UBCM Policy Paper were integrated into MMBC's Draft Stewardship Plan. We appreciate that consideration was given to these recommendations but are concerned that the Draft Stewardship Plan is too vague on details for implementation which creates uncertainty in how the Plan will be implemented in both our rural and urban communities.</p> <p>As an example, our Regional District has experienced service provision challenges for existing product stewardship programs where service delivery is minimal or non-existent in our smaller communities although residents can purchase product stewardship eligible products within these communities and are subject to the processing and collection fees charged. We request that more detail be provided in respect to reasonable access to services throughout the Regional District so that we can have comfort in knowing that additional costs of managing PPP materials will not unwillingly be incurred by the Regional District and those customers that pay product stewardship service delivery fees are getting a reasonable return on their contribution. A simple standard can be if you are able to purchase a PPP product in a community than you should have a similar level of service and ability to return it within the community.</p>	<p>The reasonable access criteria described in Section 5.2 apply to the province and have not been distinguished by urban and rural households. The BC MOE will determine when to expand the program to include ICI PPP. Where residential and ICI PPP are commingled during collection, a factor will be applied to represent the residential PPP to ensure that MMBC is paying only for the residential PPP collection service. Research will be required to determine an appropriate factor. The Recycling Regulation requires that MMBC achieve a 75% recovery target within a reasonable period of time. PPP that remains in the garbage stream is the responsibility of the local government. MMBC will consider your suggestion following the streetscape pilot project and determination of an effective streetscape collection system. Section 4.7 describes the dispute resolution process and indicates that the process will be set out in commercial agreements with collectors and processors.</p>	<p>No revision to PPP Stewardship Plan; to be considered during implementation</p>

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	<p>One of the recommendations in our Regional Solid Waste Management Plan is to support product stewardship programs as a tool to increase waste diversion. As the PPP program is the largest program to date, we encourage you to consider extending the program to include the Industrial, Commercial and Institutional (ICI) sector within 3 years as this sector generates more packaging and printed paper than the residential sector. We understand from the Draft Stewardship Plan that local governments will have an opportunity to partner with MMBC and continue delivery of existing services. Our current drop-depot collection system is an open system and we have no illusion that some of the materials collected are sourced from small business. We also understand that MMBC is proposing to deduct from fees payable to partnering local governments whose systems may have ICI sourced materials included. We don't oppose this rationale, however we would like to see a clear definition on how such deductions will be calculated as a component of the Plan and how this may affect the proposed market clearing price structure.</p> <p>Another issue for our Regional District is the lack of consideration for compensation for management of PPP materials that end up in our solid waste stream. We would appreciate more thought be given to this issue and a clear strategy be provided. The RDFFG acknowledges that the Draft Stewardship Plan offers local government the right of first refusal for some existing packaging and printed paper collection related services, but it is not applicable to the streetscape collection in communities with populations of less than 20,000. This is a concern for our Regional District as it will be for our smaller communities including those subject to seasonal population changes from tourism. We feel the Plan should include the right of first refusal for local governments on streetscape collection for all communities, regardless of size. Due to the complexity around the implementation of the final Stewardship Plan there will likely be a number of conflicts through the implementation period and beyond. To help alleviate this, the Stewardship Plan should include an enhanced dispute resolution process to ensure that local governments and MMBC have a reliable process to deal with such issues as adequate service levels and disputes in partnership relationships.</p> <p>Finally, we would like to express our concerns in respect to the deadlines for the PPP Stewardship Process. We appreciate the challenges that are faced by PPP Producers in meeting the obligations under the Recycling Regulation with regards to implementation of a Stewardship Program and commend your effort in attempting to meet your obligations. Our Regional District was ready to implement a curbside collection program for recyclable materials at the time that the Ministry of Environment announced the extension of the Recycling Regulation to include packaging and printed paper. We</p>		

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	delayed the implementation of this key element of our Regional Solid Waste Management Plan until it is clear what the future looks like. Consequently we are behind meeting our waste reduction goals. We strongly encourage you do everything in your power to stay on track to meet the May 2014 implementation deadline so we can get back on track to meeting our own goals.		
Local government	<p>Thank you for the opportunity to comment on Multi-Material BC's Draft Packaging and Printed Paper Stewardship Plan. We have reviewed the plan in detail and also participated in your webcast on October 29, 2012. We have serious concerns about the draft plan's access guidelines, particularly as they relate to rural communities. Our first and most serious concern is that the draft plan precludes the provision of curbside collection of packaging and printed paper in areas where local governments are not currently providing garbage or recycling collection services to the single family sector. This has happened without any warning or lead-time, and has the effect of excluding local governments who are in the midst of planning for the implementation of curbside collection. The Regional District of Kitimat-Stikine is in the process of designing a curbside collection system for garbage and recyclables in the electoral areas immediately adjacent to the City of Terrace. This service will be in place prior to the launch of the MMBC program in 2014. However, under the proposed stewardship plan, we would be excluded from receiving funding for curbside collection. This is unreasonable and counter to the principles of extended producer responsibility. Therefore our first recommendation is that any local government who will have a curbside collection program in place by the time the MMBC program launches be treated the same as local governments who currently have a curbside program in place. This would mean offering the local government the market-clearing price for single family curbside collection, and if the local government declined the offer, putting the service out to tender. It must be noted that many local governments either put the implementation of new collection programs on hold or proceeded very slowly with their development when the Province announced in 2009 that PPP would be included in the Recycling Regulation. Penalizing the residents of those areas for their government's caution is unwarranted and will lead to service level inequities.</p> <p>A related recommendation is that the stewardship plan must incorporate regular review periods. With the inclusion of review periods, areas in which the local government initiates a curbside collection program in the future would eventually receive funding for curbside collection of PPP. Failure to adopt this recommendation will result in those areas being shut out of curbside collection services indefinitely. The draft plan must contain mechanisms to improve the level of service over time, rather than freezing</p>	<p>With the addition of Schedule 5 to the Recycling Regulation in May 2011, both producers and local governments have been on notice that responsibility for PPP services will transfer from local governments to producers and the form of this transfer of responsibility would be set out in a plan to be submitted to the MOE in November 2012. The reasonable access criteria set out in Section 5.2 maintain current service levels for households receiving curbside collection of PPP and propose to expand curbside collection of PPP to households receiving curbside collection of garbage where they can be serviced for the market-clearing price offered by MMBC. Expansion of curbside collection services for PPP beyond these areas will be considered over time but is not proposed to be part of the program when it launches in May 2014. Agreements between MMBC and collectors will be based on the collection service provided and the corresponding market-clearing price payment. The Recycling Regulation specifies a 75% recovery target which is considered a provincial target. MMBC does not have information on the quantity of PPP supplied to residents by regional district and is therefore unable to calculate a recovery rate by regional district.</p>	No revision to PPP Stewardship Plan; to be considered during implementation

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	<p>service levels at 2012 conditions.</p> <p>We also make the following recommendation to allow local governments greater flexibility in program delivery. If the MCP for curbside collection is not offered to an area under the current access guidelines, the MCP for depots should be offered to local governments before it is offered to the private and not-for-profit sectors, and local governments should be free to use the funding towards the operation of a curbside program (if desired by residents), with the balance of funding coming from other sources of revenue. Local governments are in the best position to know what systems are likely to achieve the target recovery rates in a given area. Our past experience with depots indicates that they will have limited success in the area in which we are implementing a curbside collection program.</p> <p>We would like to point out that these recommendations are very much in keeping with the recommendations made by the Union of British Columbia Municipalities' Packaging and Printed Paper Working Group earlier this year. In particular, the Regional District of Kitimat Stikine endorses the following recommendations of the Working Group and encourages MMBC to incorporate them into the plan that is submitted on November 19:</p> <ol style="list-style-type: none"> 1. Recovery rate should be applied to each local government to ensure equivalency between rural and urban areas. 2. 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. If MMBC is serious about increasing the recovery rate of PPP from the current 50-57% to the target 75%, then it must operate under a plan that has the greatest chance of success. Freezing service levels at 2012 conditions and limiting local governments' flexibility will not generate the required increase in recovery rate. <p>We know that many other Regional Districts share our concerns, and will be submitting similar comments and recommendations. The short time between the release of the draft plan and the deadline for input has limited our opportunities to collaborate and jointly submit our feedback.</p>		

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Local government	<p>The biggest concerns focus on section 4.2 titled Packaging and Printed Paper Program Delivery Principles (PPDP) which seems to drive the contentious portions of the DPPPSP's delivery model.</p> <p>Clauses such as: Focus on outcomes, not process — maximize recovery, maximize efficiency. enhance resident service levels while minimizing complexity; Provide economic incentives and set simple rules — effective economic incentives will drive behavior that increases recovery activity throughout the PPP reverse supply-chain; simple rules will provide clarity and certainty to those collecting and recycling PPP; Appear geared towards focussing on provincial wide recovery targets at the most economic cost possible while ignoring the fact that conditions are not homogeneous across British Columbia. Taken to its logical conclusion, recovery efforts will be centered on large high density urban communities where recovery unit costs will be lower, at the expense of providing equal level of services for small low density rural communities. This philosophy is counter to Policy Paper #2 (PP2) passed at the 2012 UBCM conference and endorsed by the Minister of the Environment. A key clause from PP2 is: 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</p> <p>75% Recovery Target: The plan identifies the requirement that the British Columbia recycling system have a 75% recovery target. This commitment is small comfort to rural communities unless the 75% recovery target is achieved at the regional district level as opposed to a provincial base. Failure to commit to regional district targets will draw an uneven level of services with a disproportionate focus being placed in urban areas such as the lower mainland or the Nanaimo/Victoria corridor where the unit cost for diversion will be cheaper. The DPPPSP only commits to operational effectiveness indicators but appears to be under no obligation to address short comings the indicators may reveal.</p> <p>Market Clearing Price (MCP): A province wide MOP will be very problematic for regions whose population densities are very low, Communities with challenges such as water or logging road access only will have a disproportionate impact on region wide collection delivery costs if there is not a large urban area to balance out unit costs. The MOP needs to reflect local access conditions. differing fuel costs, varying economies of scale and other issues that are beyond the collectors ability to control.</p> <p>Collectors/Processors Interaction: The MOP also creates concerns between the relationship with processors and collectors. A province wide MOP will be a challenge to cover the extra cost of delivering recycled PPP to processors from remote communities.</p>	<p>The PPP Stewardship Plan proposes to offer market-clearing price financial incentives to provide curbside collection of PPP to households currently receiving curbside collection of PPP which will maintain current levels of service. The Plan also proposes to offer market-clearing price financial incentives to provide curbside collection of PPP to households currently receiving curbside garbage which G23 will expand service levels. The Plan proposes to offer market-clearing price financial incentives for MF collection and depot collection. These incentives will be available in both urban and rural areas.</p> <p>MMBC will report the quantity of PPP collected within each regional district. This information will identify regional differences. In some cases, these are the result of differing patterns of generation in rural areas, for example fewer and smaller newspapers and use of papers for fires, etc. MMBC will adjust market-clearing prices for collection services over time as required to deliver the 75% recovery target, taking into account regional differences in generation and recovery. MMBC will be undertaking research into existing collection costs and will set financial incentives to act as a market-clearing mechanism for both urban and rural areas. Following research into collection costs in various areas and circumstances, the market-clearing prices may be set to reflect different cost drivers.</p> <p>The market-clearing price is intended to address only collection activities (curbside, depot, MF building). Post-collection activities, including consolidation, transfer, transport to a MRF, processing and marketing, will be part of a request for proposals issued by MMBC. Costs for these activities are addressed through contracts with primary processors, not through the market-clearing price offered to collectors. The market-clearing price offered for collection services will include amortized capital costs associated with collection activities. Bid prices in response to MMBC's RFP for post-collection will include amortized capital costs for consolidation, transfer, transport to a MRF, processing and marketing services.</p> <p>The PPP stewardship plan is intended to recover 75% of PPP. PPP not collected by the stewardship plan will remain in the garbage system. Producers that supply non-recyclable PPP will contribute to the cost of operating the PPP system and will be responsible for R&D</p>	<p>No revision to PPP Stewardship Plan; to be considered during implementation</p>

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	<p>Extended distances and the logistics of ferries and other transportation factors could consume a significant portion of a MOP. As a greater portion of the MOP is consumed by haulage costs, will PPP from remote communities become orphaned by MMBC as processors find these materials nonviable?</p> <p>Capital Cost Recovery: Clarification is needed regarding what capital cost recovery will be acceptable to MMBO. Communities who need infrastructure investments to raise their performance to achieve target recovery rates need to know how quickly these investment costs can be recovered. The cost recovery terms should vary depending on the infrastructures life expectancy i.e. totes may last 5 years while balers may provide service +10 years.</p> <p>Compensation for “Problem” Packaging: Where the PPP stewardship program makes no provision for the recovery of types of packaging who pose challenges for recycling, local governments should be compensated for garbage collection and landfilling costs. This additional cost born by producers of problem packaging is a further incentive to change practices and compensates local government for the burden of disposing of these waste products.</p> <p>Optional Third Party Audits: The predicted cost recovery for MMBO’s operation will likely not involve applying a fee at the point of sale of products in packaging and printed paper. This cost recovery model appears to negate the need for a third party audit of MMBO’s annual report. While MMBO reserves the right to carry out an audit, it is the RDMW view that a third party performance audit should be mandatory and that auditors consult local governments as part of the audit process to determine the level of satisfaction with the PPP stewardship program.</p>	<p>costs to overcome the technical barriers that prevent this packaging from being included in the PPP collection system.</p> <p>The Recycling Regulation requires third party audits of financial statements only if fees are charged to residents at point of sale. The BC MOE requires third party assurance opinions of accessibility and program performance. Section 5.5 of the PPP Stewardship Plan states that MMBC will include a reasonable assurance opinion of the accessibility indicators and operational effectiveness indicators by a third-party in its annual report.</p>	
Local government	<p>Draft List of PPP to be Collected</p> <ul style="list-style-type: none"> • In discussion with our recycling contractor I do support the removal of glass from curbside collection in favour of convenient depot options for residents. • Film plastic should not be removed from the curbside collection stream. Speaking with our recycler they can deal with film plastic in blue bag co-mingled collection. Their only concern is the low value of the material. Losing this material from our local curbside collection would be an unnecessary hardship on our residents. We use film plastic (blue bags) to package our recycling hence any MRF accepting our materials would be required to collect and market this film plastic. • Although I support aerosol cans being included in collection I am concerned that partially emptied containers could present a safety risk to collectors and processors. You will require to look closely at including this packaging type. • I am very concerned that ‘non-recyclables’ such as plastic laminates, paper/plastic 	<p>Draft List of PPP to be Collected: Thank you for your comments on glass, plastic film and aerosol containers n curbside collection systems, non-recyclable PPP and dairy containers. Regarding books, MMBC will consider the administrative implications of local governments including books in their PPP collection systems. Cardboard placed into the PPP collection system by residents will be accepted.</p> <p>Streetscapes: Local governments may implement streetscape collection programs at their discretion. MMBC's streetscape collection, including offering a market-clearing price incentive to local governments to offset their costs in delivering their existing streetscape collection systems, will be delivered in the areas that meet the reasonable access criteria. Depot: Bin rental and leases are operating costs that would be considered in setting the market-clearing price.</p>	No revision to PPP Stewardship Plan; to be considered during implementation

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	<p>laminates, other films, biodegradable plastic and food soiled paper fibre be addressed in more detail. I would like to see clearer obligations into how MMBC will be dealing with these waste materials.</p> <ul style="list-style-type: none"> • The RDOS may wish to collect more recyclables such as books. Will MMBC allow that occur in co-mingled collection with PPP materials? Will there be provisions in place? • Strictly speaking the PPP will not include commercial cardboard but small amounts of commercial cardboard (ie. moving boxes picked up from businesses) will be placed out by residents. I would like to see that this material will be collected if reasonable amounts are placed out by residents. Our current policy allows us to not collect commercial volumes of cardboard. • I would like to see the voluntary milk box program at Encorp be continued as residents in our communities are using the service. <p>Streetscapes</p> <ul style="list-style-type: none"> • The MMBC plan is unclear how local governments will be able to develop new streetscape or public space recycling initiatives. New programs will be developed over time and MMBC provides no assurances that these programs will be included within the MMBC program. <p>Depot</p> <ul style="list-style-type: none"> • The MMBC must consider bin rental and land lease for depots when considering market clearing prices. <p>Collection</p> <ul style="list-style-type: none"> • The approach of MMBC in terms of Market Clear Price ignores that fact that distance and density, but not necessarily efficiency, determine collection costs. The RDOS has conducted open tender calls for pricing and chosen the most cost effective contractor for the service. The contractor is already incentivised to find efficiencies within that price. Regional districts are faced with servicing a wide variety of communities. A lump sum to these community services will place relatively more revenue in those communities with lower service costs; leaving more inaccessible communities potentially needing to subsidize this service. The Market Clearing Price is more efficient for MMBC to administer but it does not promote efficiency. MMBC should be prepared to pay the actual costs associated with collection of recycling where the local government can transparently show how contracts for service are competitive and drive innovation. Otherwise Regional Districts will keep the ‘gravy’ areas and hand MMBC the hard to service areas without the benefit of co-collection with garbage. That will be much more expensive for MMBC to administer. • MMBC should recognize that source separated organic collection where garbage and 	<p>Collection: The availability of PPP within collection services areas, in terms of population density, will be considered when setting the market-clearing price. Thank you for your comment on the implications to PPP collection of adding organic waste collection. Processing: We recognize the challenges in tracking PPP to downstream processors and recycling end-markets but it is being done in other producer responsibility programs for PPP. Existing contracts: Thank you for your comment. Education: Where a local government is not the collector, MMBC and its contracted collector would need to deliver public education information to support the MMBC collection service. it is unclear what educational information a local government would provide under these circumstances. Where the local government is the collector, information on the collection service will be required by residents. The local government could deliver these services and decline the portion of the market-clearing price for public education. Unintended Consequences: The integration of residential and ICI PPP at depots, transfer facilities and MRFS is a practical reality and mechanisms will be developed to ensure that MMBC is paying only for the residential portion of these activities.</p>	

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	<p>yard waste are collected on alternating weeks may require MMBC to operate their own recycling service in the next 5 years. This was a finding of a recent RDOS study.</p> <p>Processing</p> <ul style="list-style-type: none"> • From my discussions with processors MMBC will have serious problems tracking materials as each MRF may only take out the higher value materials and pass the rest to another facility. This is identified in your report but I am unclear on how feasible this will be for MMBC to track and manage to ensure proper recycling downstream. <p>Existing Contracts</p> <ul style="list-style-type: none"> • The RDOS has contracted services for both collection and processing to the same entity. Disentangling these costs will be difficult with the commodity revenue sharing envisioned by MMBC complicating the issue. <p>Education</p> <ul style="list-style-type: none"> • Will the payments for educational services necessarily be linked to provision of service? If a local government refuses to be the collector can they still be the local educator? Can they be the collector and refuse education funds? <p>Unintended Consequences</p> <ul style="list-style-type: none"> • Co-mingling of residential and commercial PPP has allowed for more efficient infrastructure use such as collection, compaction and transfer to MRF. MMBC should work hard to ensure companies can keep these efficiencies. In our local area our contractor may collect from rural businesses using the same recycling equipment as collection of residential. This is a benefit to these outlying businesses that should be addressed fairly. 		

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Local government	<p>Please accept the following comments from the Regional District of Okanagan-Similkameen regarding corrections to the March 2012 'Current System for Managing Residential Packaging and Printed Paper in British Columbia'. The RDOS addressed errors in the February 2012 draft document in a February 28th letter. Although many of the errors were corrected the RDOS would like to point out the following errors in the March 2102 document:</p> <p>Table 5.2 does not include the City of Penticton, District of Summerland and the Town of Oliver. These municipalities currently provide multifamily collection through a contractor. Figure 5.6 shows the J&C Bottle Depot in Penticton, Osoyoos Bottle Depot and the Oliver Bottle Depot as 'Does not accept (non-deposit) PPP'. Beyond the typical acceptance of cardboard and boxboard these depots also accept non-deposit container glass. These businesses are paid a monthly lease fee by the RDOS (Penticton, Oliver) and the Town of Osoyoos for collecting non-deposit container glass. The local governments contract collection of non-deposit container glass from these facilities through a local waste hauler. All local landfills also accept non-deposit container glass. Table 5.8 J-R Contracting and Recycling Ltd. is located in Princeton, BC and not Penticton.</p> <p>Appendix B – Service Providers by Regional District - Okanagan-Similkameen Regional District</p> <p>The RDOS operates depots on behalf of the municipalities of Penticton, Oliver and Keremeos and the unincorporated area of Okanagan Falls. The municipalities of Osoyoos, Princeton and Summerland all offer their own depots at their own facilities. Osoyoos and Summerland are not listed as having depots.</p> <p>In terms of Subscription Collection Services for Multi-Family this service is provided by a number of local waste haulers including BFI Canada (Progressive), Waste Management and Okanagan Waste Removal Systems Ltd. (based in Summerland, BC). These businesses are active in MF developments in unincorporated areas, Town of Osoyoos and Village of Keremeos where multi-family units exist but are not provided service by a local government. These MF developments include mobile home parks that opt for commercial collection rather than curbside collection from a local government. Other businesses may be active in providing this service. Okanagan Waste has a small pre-sort line and bailer in Summerland which they may use before bringing materials to one of the MRFs in Kelowna.</p> <p>Appendix D – Packaging and Printed Paper Accepted in Local Government Collection Systems - Okanagan-Similkameen Regional District</p> <p>The majority of rural RDOS and member municipalities of Penticton, Summerland,</p>	<p>Thank you for the corrected data. The Current System for Managing Residential Packaging and Printed Paper in British Columbia report was finalized in March 2012. We will take your corrected information into consideration when implementing the PPP Stewardship Plan.</p>	<p>No revision to PPP Stewardship Plan; to be considered during implementation</p>

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	<p>Oliver, Osoyoos and Keremeos recycle all hard cover books, plastics 1-7 and metal items in their SF, MF and depot programs. Most materials, outside of Princeton, go to the BFI Canada Kelowna MRF. Our list of items should closely match the Central Okanagan RD in terms of collecting all items except for glass which is not collected by SF or MF but is collected at all depots (glass is correctly displayed). Aseptic containers are not collected as correctly shown. We do not advertise the fact we can recycle clean Paint Cans and other metal packaging but we can accept. We do advertise the collection of aluminum foil and hard cover books.</p> <p>The Town of Princeton and Electoral Area 'H' program only collects all No. 2 plastics and clear No.1 plastics. The Princeton MRF can accept all other metal items and hard cover books. These appear correct in the document.</p>		

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Local government	<p>Thank you for the opportunity to comment on the draft PPP stewardship plan. The broad scope, depth of research and development of the plan in such a short time frame are impressive and commendable. That being said, we feel that several areas of the program are too vague as currently drafted. Specifically, we would like additional clarity on how the new plan will impact rural service levels, how the short implementation timeframe will be achieved and what types of processing options will be acceptable. Further, we respectfully request that local governments be represented on the MMBC board of directors.</p> <p>Currently, the Ministry of the Environment is mandating a 75% recovery rate of all PPP in BC. Clearly, focusing programs on the highest density areas will result in achieving higher recovery rates. Understanding that the program's intention and requirement is to recover materials and provide reasonable access throughout the province, we are concerned with how rural and isolated areas will be administered in the program. We already experience challenges in rural areas with existing stewardship programs, such as limited or no servicing opportunities. We would like clarification on whether higher density areas will subsidize smaller density areas, or will producers download the charge to consumers, which in essence, would act as a fee to use a product in such an area. In addition, given the scale and scope of the changes, the ambitious implementation timeframe of this program is troubling, especially given the lack of details on how the implementation will occur. Experience with local government (LG) demonstrates that all decisions require time and due process. Many LG staff function under heavy workloads, and details of a clear implementation timeframe that allows for adequate government consultation and contract negotiation across BC would benefit all who will be involved with this plan. It is difficult to make timely and effective decisions when specific program details are vague. Confusion exists in several areas of the plan with financial implications, such as:</p> <ul style="list-style-type: none"> • fairness of the market clearing price; • collection and processing costs in urban vs. rural areas; and • collection and processing costs by tonnage or number of households. <p>We would also like to know whether MMBC will dictate if various processing options receive various levels of financial support. In other words, for local governments that collect paper, boxboard and/or cardboard and use it as a valuable and necessary carbon requirement in local composting operations, will such a program receive the same market clearing price offer as another program that delivers the same products to the worldwide commodity market?</p> <p>Finally, due to the complexity and variances of existing programs across the province</p>	<p>Section 5.2 of the draft PPP Stewardship Plan proposes criteria to establish reasonable access which are not distinguished for urban and rural households. MMBC will work with local governments and other stakeholders to prepare for implementation considering the May 2014 implementation timeline. Research into current collection costs will consider the circumstances that drive the cost. The RFP for post-collection services will consider the commodity value for the processed material received by the bidder. MMBC will be consulting with governance experts to ensure that the program is overseen by directors who are well versed in necessary core competencies and their fiduciary responsibilities. MMBC will also continue to dialogue with local governments during implementation of the PPP plan.</p>	<p>No revision to PPP Stewardship Plan; to be considered during implementation</p>

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	<p>and given that there are still so many unknowns with the current plan, we feel strongly that local governments (LG's) should have a voice in the ongoing evolution of the PPP stewardship plan. For decades, LG's have advocated and implemented successful recycling collection, processing and education programs to their constituents; it is a service residents have come to expect. The SLRD is seeking to understand how the plan will allow for regional flexibility, self-governance opportunities and local business competition. In order to ease the transition into the new PPP program, we feel it is necessary to have LG representation on the MMBC board, ideally working with the BC Product Stewardship Council (BCPSC) to allocate appropriate representation. The role of LG representation on the MMBC board will be to ensure accountability and transparency, and to act as a liaison between LG's and MMBC. This relationship will assist with a comprehensive and continuous knowledge sharing of the program. In closing, we look forward to working together to develop a PPP plan that provides fair and reasonable access for all British Columbians, as well as having consistent communications and programming throughout the province. Following the initial transition phase, we look forward to the expansion of PPP recycling opportunities to all residents, institutions, commercial and industrial businesses; in conjunction with developing a strong incentive for producers to take environmental responsibility in regards to the design of PPP without simply downloading the cost to the consumer. Developing the first program of this scope in Canada is a commendable undertaking and deserves strategic planning and considerate implementation. MMBC has achieved impressive work to date; however significant responsibilities remain.</p>		
Local government	<p>Comment #1 The consultation period following release of the Draft PPP Stewardship Plan (October 23, 2012) is too tight to allow local government adequate time to review the information and have meaningful discussions amongst staff, elected officials and solid waste advisory committees. Consequently, the SCRDC is concerned about the lack of opportunity for local governments to be meaningfully consulted and engaged in the Draft Plan review.</p> <p>Comment #2 Given the provincial mandate to provide reasonable and free access to services for all areas of British Columbia, the Draft PPP Stewardship Plan should be amended to include clear wording that guarantee's service in all communities where PPP is generated. Currently, text in Section 5.2 (page 19) indicates that reasonable access to collection services will be provided for single and multi-family households receiving garbage or recycling collection services (for SFD's) "which can be serviced for the</p>	<p>Comment #1: MMBC will accept comments to December 14, 2012. If comments received after November 9 result in revisions to the plan, an updated plan will be submitted to the MOE in early January 2013.</p> <p>Comment #2: MMBC is proposed to maintain current service levels for curbside collection as indicated in the first sub-bullet which does not include the phrase "which can be serviced for the market-clearing price offered by MMBC". This phrase is applied to households that receive garbage curbside service but do not currently receive PPP curbside service so that MMBC can determine whether these households would be better served by curbside or by depots. Similarly, this phrase is applied to depot collection households so that MMBC can determine appropriate locations for depots. Comment #3: See response to comment #2. Comment #4: Section 5.2 lists both curbside and depot as collection services for single-family households. For clarity, the</p>	<p>Revisions to Section 5.5. as described. Comment # 5 to be considered during implementation</p>

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	<p>market-clearing price offered by MMBC”. This wording suggests that the Market Clearing Price will be the determinant over where service is to be provided, therefore it is suggested that the statement “which can be serviced for the market-clearing price offered by MMBC” be omitted. Specifically, the reasonable access criteria outlined in Section 5.2 (Accessibility), page 19 should be amended to read as follows:</p> <ul style="list-style-type: none"> • For single-family households through <ul style="list-style-type: none"> o Curbside collection in areas currently receiving curbside collection of PPP; o Curbside collection in areas currently receiving curbside collection of garbage; o Depot collection for PPP in areas currently receiving depot service; • For multi-family households through <ul style="list-style-type: none"> o Curbside collection for PPP where the PPP is placed on public easements for collection on regular single family curbside routes; o Collection services from multi-family dwellings where set-out of PPP is on private property; <p>Comment #3 It is noted based on responses to inquiries made by the SCRD and other local governments that where a local government declines the Market Clearing Price, MMBC will tender for collections services directly, however service will only be provided where the bid price received is equal to or less than the Market Clearing Price. This does not guarantee reasonable access to services, particularly for smaller rural communities where the cost of service may be high relative to other areas of BC and where competition within the private sector is lacking, and is therefore at odds with MMBC’s stated acknowledgement of the need for “Services in large, urban areas as well as remote, sparsely populated areas” (Section 5.2, page 18). The Draft PPP Stewardship Plan should include wording that clearly establishes MMBC’s commitment to tender for services directly and to select a service provider to provide PPP collection services regardless of the cost relative to the Market Clearing Price (provided reasonable access criteria are met).</p> <p>Comment #4 Based on SCRD’s discussions with MMBC’s consultants, it is our understanding that it is MMBC’s intention to allow for collection of PPP both at curbside and at depots where accessibility criteria are met (see proposed amendment to reasonable access criteria in Comment #1). However, the Draft PPP Stewardship Plan does not make it clear that MMBC will provide both forms of collection services. In the SCRD, both forms of collection services are needed to achieve the recovery target while ensuring access to</p>	<p>word and has been inserted between the second and third bullets. For clarity, this has been repeated for multi-family households. Comment #5: MMBC will consider the implications of modifying the proposed reasonable access criteria after determining an effective streetscape collection system. Comment #6: As companies are typically looking for opportunity to grow their businesses, MMBC anticipates responses to offers of a market-clearing price for depot collection services. Should MMBC receive no interest, MMBC will investigate the reasons for the lack of response. Comment #7: An annual event-type depot collection service would be eligible for the market-clearing price for depot collection. Comment #8: Thank you for your comment. Comment #9: MMBC is not able to calculate a recovery rate for each regional district as it will not have information on the quantity of PPP supplied within a regional district. Comment #10: The Recycling Regulation sets a 75% recovery rate target. It does not reference regional districts as the basis for this performance. However, MMBC will report on the quantity of PPP collected by regional district. Comment #11: Information on the quantity of processing residues will be compiled through contracts for post-collection services. Requiring service providers to report energy consumed, greenhouse gas emissions and jobs created will add administrative burden, complexity and costs. Comment #12: The Recycling Regulation requires submission of audited financial statements only where fees are charged at point of sale. Comment #13: The market-clearing price will reflect efficient delivery of the service. This may or may not reflect the costs currently incurred. The market-clearing price will take into account cost drivers. Comment #14: Research into collection costs will take into account whether the collection system is single or multi-stream. Comment #15: It is expected that qualification standards will allow as much discretion in system design as is reasonable while achieving the objective of setting qualification standards. Comment #16: Qualification standards are not intended to provide a competitive advantage to one service provider over another. Comment #17: Qualification standards will include requirements that can be measured and enforced. Comment #18: The market-clearing price is intended to cover collection costs. The RFP for post-collection services will include activities such as receiving</p>	

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	<p>services for residents in multi-family dwellings not serviced by curbside collection and single family dwellings accessed by unserviced roads (i.e. also not serviced by curbside collection). A footnote (#35) should be added in Section 5.2 (Accessibility) on page 19 associated with the reasonable access criteria for single-family households and multi-family households clarifying that MMBC may provide PPP collection services via depot collection and curbside collection within the same community provided the reasonable access criteria are met as the two forms of collection are not considered mutually exclusive (see proposed amendment to reasonable access criteria in Comment #1).</p> <p>Comment #5 The reasonable access criteria proposed in the Draft PPP Stewardship Plan for streetscapes (Section 5.2, page 19) are not acceptable and do not address the needs of smaller towns and public spaces in rural and suburban communities, particularly where tourism is a factor, and should be expanded within a set timeframe. It is recommended that the Draft PPP Stewardship Plan take a phased approach to providing streetscape collection services as follows: Phase 1: This would include providing service to communities that meet the existing reasonable access criteria outlined in the Draft PPP Stewardship Plan. Phase 2: This would include providing service to smaller communities with populations greater than 2500 and population densities of 200 or more people per square kilometer. SCRD agrees that a research and test period is required to ensure streetscape collection systems are developed that can achieve MMBC’s goals, however it is further recommended that the Draft PPP Stewardship Plan be amended to include a clear timeline to implement services both for communities that meet the existing reasonable access criteria (Phase 1) and smaller communities (Phase 2).</p> <p>Comment #6 With respect to provision of depot services for collection of PPP, the Draft PPP Stewardship Plan currently indicates that where local governments or private operators decline the Market Clearing Price, MMBC will make no arrangements for provision of depot services. It is recommended that page 8 of the Draft PPP Stewardship Plan be amended to indicate that MMBC will, in such instances, tender for depot collection services and will select a service provider regardless of the bid price relative to the established Market Clearing Price, as follows:</p> <ul style="list-style-type: none"> • To operate depots for receiving PPP from residents generated from single-family and 	<p>materials from collection vehicles and shipping by road and ferry. Comment #19: The MOE is responsible for enforcement of the Recycling Regulation.</p>	

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	<p>multifamily households MMBC will offer a financial incentive to any interested party that is able to comply with the collector qualification standards for PPP collection services contingent on the types of materials accepted from residents:</p> <ul style="list-style-type: none"> o Where a local government accepts the offer of the financial incentive, an additional incentive will be offered to provide public education, promotion and first point of contact for collection service customers; o Where a private company accepts the offer of the financial incentive, MMBC will provide public education, promotion and management of collection service customers through its own means; and o Where the local government and private companies decline the offer, MMBC will issue a tender for depot services, will select a service provider to provide depot collection services for PPP and will provide public education, promotion and management of collection service customers through its own means. <p>Comment #7 The Draft PPP Stewardship Plan does not provide for reasonable access to PPP collection services (or compensation for same) for isolated areas that may not be serviceable by any of the means outlined in Sections 4.4 and 5.2. For example, SCRD provides annual collection services for municipal solid waste, PPP and other materials to island residents as part of the annual Islands Cleanup Event. This is done as it is impractical to service these communities via conventional collection mechanisms at this time. MMBC's stewardship plan for PPP should include provision for periodic (e.g. event-based) collection in special cases such as this and where local government already has a program in place to provide periodic collection of PPP or garbage.</p> <p>Comment #8 It is important that the following be included in the Market Clearing Price for the operation of a depot: snow removal costs; sanding and salting costs; rent/lease of space; management fees (attendant to deal with calling for service, picking up illegal dumping, etc.); signage; education; site maintenance; site staffing (to minimize opportunities for contamination); equipment/asset values and depreciation, monitoring and reporting. With respect to monitoring and reporting, depots will be challenged to put systems in place to monitor and report on collection of residential PPP separately from commercial PPP, potentially resulting in increased labour demands. This should be accounted for as part of the</p>		

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	<p>Market Clearing Price. Comment #9 MMBC's Draft PPP Stewardship Plan should be amended to include a firm timeline to implement material specific recovery targets and reporting at a provincial level, and reporting of aggregate recovery rates by Regional District. It is acknowledged that this represents a challenge for MMBC and producers and that a period of data collection and system refinement is required to achieve this level of disaggregation in the reporting structure, however a timeframe to achieve these goals needs to be enshrined in the stewardship plan itself. It is recommended that Section 5.5 of the Draft PPP Stewardship Plan (Reporting) be amended to include the following wording: By 2020, MMBC will develop and report on material specific recovery targets for the province as a whole and total recovery rates expressed as a percentage for each regional district.</p> <p>Comment #10 Until such time as regional recovery rates can be calculated and reported by MMBC, it is recommended that the Draft PPP Stewardship Plan be amended to include wording under Section 5.2 (Accessibility) and Section 5.5 (Reporting) committing to achieve similar collection rates for PPP amongst regional districts, and indicating that where regional collection rates are below average, MMBC will investigate the reasons why and implement measures to improve the PPP collection rate within that given regional district. It is further recommended that the Ministry of Environment ensure that MMBC is required to achieve similar collection rates in all regional districts and to ensure MMBC implements measures to improve collection rates in areas where these are below average (such as increased provision of collection services).</p> <p>Comment #11 The performance indicators proposed in Section 5.5 (Reporting) of the Draft PPP Stewardship Plan are insufficient and should include quantitative environmental and social impact measures. Currently, the Draft Plan includes virtually no measurable indicators of environmental or social impacts. It is recommended that the following indicators be added to Section 5.5 of the Draft PPP Stewardship Plan:</p> <ul style="list-style-type: none"> • Energy consumed (by fuel type) • Greenhouse gas emissions generated (CO2e) • Residual waste sent for disposal (tonnes/year) • Jobs created or retained in BC (or by regional district) <p>Furthermore, these indicators should be monitored and reported by MMBC separately for collection and processing activities and be incorporated into all MMBC contracts and</p>		

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	<p>tender documents (i.e. as bid requirements and evaluation criteria) to incentivize innovative technologies and approaches at both ends of the reverse supply chain.</p> <p>Comment #12 The Draft PPP Stewardship Plan should include, and the Ministry of Environment should require, a commitment from MMBC and producers to maintain complete transparency with respect to reporting of fees charged to producers by type of PPP, revenues collected by MMBC and the cost of services provided (both in aggregate for the province and by regional district).</p> <p>Comment #13 The Market Clearing Price should be designed to cover 100% of the cost of providing collection services in a given area in order to discharge producers' responsibility under the Recycling Regulation to provide reasonable and free access to services. As the Market Clearing Price appears to be a fundamental component of this stewardship plan yet remains completely undefined within the context of the plan itself (which will effectively form the Province's terms of reference for the stewardship agency) additional information regarding this financial incentive is needed in the Draft PPP Stewardship Plan itself. Currently, the Draft Plan sets no parameters or criteria for the Market Clearing Price, saying only that "The price level will be developed through research into collection service performance...and service delivery costs across British Columbia." Essentially, implementation of the Draft Plan hinges largely on this financial incentive yet says virtually nothing about it or how it will be determined. In order to provide some goal-posts for the Market Clearing Price financial incentive, it is recommended that the following wording, or similar, be included in the Draft PPP Stewardship Plan at a minimum: The Market Clearing Price will be developed to reflect the full cost of providing collection services within a given area (both at curbside and at depots) and to reflect local cost drivers and not based on a "one size fits all" model.</p> <p>Comment #14 MMBC should factor the form of curbside collection (i.e. multi-stream vs. single-stream co-mingled) into its development of the Market Clearing Price for curbside collection. Many local governments in BC have elected to implement multi-stream curbside collection programs for PPP. This form of collection is often more costly, however has proven for many communities to save money on the processing end by simplifying processing requirements, minimizing contamination and maintaining high commodity values. With MMBC arranging for provision of processing services directly, these savings will no longer accrue to local governments but will rather accrue to MMBC. Therefore, it</p>		

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	<p>is recommended that the benefit to MMBC be factored into the Market Clearing Price offered for multi-stream curbside collection systems given that local governments with this form of collection would be effectively penalized otherwise.</p> <p>Comment #15 With respect to the qualification standards for operators to be established by MMBC, it is vital that these do not prohibit one form of collection over another provided it is done to an acceptable standard of care. With respect to curbside collection, this means that qualification standards should allow for both multi-stream and single-stream co-mingled collection in order to both minimize disruption to existing systems and infrastructure, and to ensure communities that have expended considerable resources planning to implement curbside collection systems of one form or the other are not constrained to a “one size fits all” approach. With respect to depots, this means ensuring that qualification standards are not overly prescriptive with respect to facility design, equipment, staffing and co-located services so as to minimize disruption to existing systems and infrastructure, and to ensure communities that have expended considerable resources planning to implement new or enhanced forms of depot collection are not constrained to a “one size fits all” approach to service provision. This is an issue of great importance to some communities like the SCRD.</p> <p>Comment #16 With respect to the qualification standards for operators to be established by MMBC, it is critical that these be established so as to provide an even playing field for both smaller and larger operators alike. For example, it is important that qualification standards do not provide a disproportionate advantage to large haulers and processors over smaller operators involved in these activities.</p> <p>Comment #17 Qualification standards should include environmental and social standards of practice related to, at a minimum, health and safety, payment of fair wages, energy and emissions management, corporate social responsibility, and others as may be considered appropriate. This would ensure that operators are not selected based only on who can provide the most service for the least cost but on who can operate according to sustainable best practices as seen from a triple bottom line perspective. SCRD would like to see wording included in the Draft PPP Stewardship Plan to this effect.</p> <p>Comment #18 MMBC’s proposal to establish a list of collectors prior to issuing an RFP for processing services is problematic. Under this proposal, local governments will need to decide whether to accept the offered Market Clearing Price before knowing who the processor</p>		

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	<p>is that they will be required to deliver PPP materials to (for curbside collection). As the distance a truck must travel from its collection route to the processor is a significant factor in overall collection costs, local governments will be in a poor position to evaluate the offered Market Clearing Price until the location of the processor is known. This is of particular concern for more rural communities and ferry-reliant communities like the SCR D where this could overwhelmingly influence collection costs. It is recommended that MMBC ensure that information regarding the location of processors who will be receiving collected PPP for a given regional district be made available to the local government well before a decision on whether or not to accept the Market Clearing Price is required.</p> <p>Comment #19 Should MMBC not achieve the 75% recovery target and this material continues to be received and managed at waste disposal facilities (as determined through waste audits), MMBC should be required to provide adequate compensation to the local government to cover associated disposal costs. SCR D would like to see wording included in the Draft PPP Stewardship Plan to this effect.</p>		

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Local government	<p>1. I feel that the draft plan over simplifies the collection/processing system. In many rural areas PPP is handled numerous times prior to it ending up at a processor. For example we have curbside collection service done by a municipality, the material is then hauled to a small recycling depot run by the district (the depot also accepts PPP dropped off by residents), the depot material is then hauled to a large eco-depot where material is loaded into b-trains (also run by the district). Although this system may sound cumbersome, this is the most efficient system given the large area and small populations in areas of our RD.</p> <p>2. I am concerned that MMBC will be submitting a plan to the MOE with no dollar values attached. I appreciate the concept of a Market Clearing Price (MCP), however I feel that once the MCP is determined there will be much discussion on what is a fair price (especially in different geographic areas of the province). If the MOE approves a plan with no price attached I am concerned MMBC can set the price as they see fit. MCP's must be approved by the MOE after receiving comments from stakeholders.</p> <p>3. I understand that contracts for collection will first be offered to local governments but depot service is offered to anyone willing. In the past, many local governments had to make a decision what was the most efficient system to offer to residents (depot or curbside). Local governments currently offering depot service should have first right of refusal similar to curbside collection.</p> <p>4. In rural areas, at both depots or in curbside collection it will be next to impossible to distinguish between residential and ICI. These PPP streams are collected/received together because it is far more efficient to do so.</p>	<p>1. We understand that PPP collected in areas with small populations must be consolidated and transferred. 2. Research into collection costs is required prior to setting market-clearing prices. There will be an opportunity to review the proposed market-clearing prices. 3. Many jurisdictions have both local government depots and private depots operating in parallel. 4. We appreciate the challenges distinguishing between residential and ICI PPP. However, there are operating examples of programs that apply factors to ensure that producers that are obligated for residential PPP are, in fact, paying only for the residential portion of collected PPP.</p>	<p>No revision to PPP Stewardship Plan; to be considered during implementation</p>

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Local government	<p>The MMBC plan addresses some of the concerns that were identified in our Policy Paper, which was endorsed by UBCM members at the September Convention. We thank you for integrating a number of our core recommendations into your plan, including:</p> <ul style="list-style-type: none"> • Building on PPP collection and recycling systems by delivering more collection services, and maintaining existing levels of service for those local governments that have established PPP programs in place. • Offering local governments the right of first refusal on providing curbside and streetscape PPP collection services in the new program. • Committing to the provision of services in both large, urban areas as well as remote, sparsely populated areas. • Working towards the reduction of environmental impacts of a product through innovations that affect the stages of its life cycle both before and after it reaches the consumer. <p>However, there are a few outstanding issues that we would like incorporated into the final version of the plan.</p> <p>1) The plan offers local governments the right of first refusal for some PPP collection, but this does not extend to streetscape collection in communities with populations of less than 20,000. This is a concern for our smaller communities as well as those with high seasonal populations due to tourism in their areas. We would like your plan to include right of first refusal for local governments on streetscape collection for all communities, regardless of size.</p> <p>2) The plan notes that right of first refusal will not be provided to local governments for multi-family areas. This is an issue for some of our local governments, as collection from both single-family and multi-family areas may be integrated on existing routes, within the same truck, and on the same day. Therefore, we ask that MMBC address this issue in the plan to ensure a smooth transition for local governments with established PPP programs.</p> <p>3) Another issue for us is the lack of compensation for local governments for the management of PPP materials that end up in the local government waste streams. We strongly encourage you to incorporate this recommendation into the stewardship plan, and allow for an enhanced dispute resolution process to ensure that local governments receive payment for impacted costs, if producers do not provide adequate service levels.</p> <p>4) We would also like to see stronger wording around the provision of collection services in both rural and urban areas. Our members have identified service provision challenges in rural and remote areas for existing provincial product stewardship programs.</p>	<p>1) MMBC is responsible to the producers that choose to be its members to meet the requirements of the Recycling Regulation in an efficient and effective manner. MMBC has indicated that a significant effort is required to develop an effective streetscape collection system. MMBC will consider the implications of modifying the proposed reasonable access criteria after determining an effective streetscape collection system.</p> <p>2) MMBC has taken this approach to multi-family building collection because there is a wide spectrum of collection service delivery models for MF buildings in BC. In some areas the local government provides the service, while in others local governments are not involved and commercial collection is provided to MF buildings. The proposed approach is intended to allow for all forms of MF building collection activities to continue. In most jurisdictions, MF buildings are considered commercial properties for the purposes of garbage collection because MF buildings generally require garbage collection services that can be tailored to each building's specific needs (such as size of the complex, access, available space, etc.). In these circumstances, the building manager or strata council makes the determination as to what service best suits their needs. Similarly, the MMBC plan is intended to provide each MF building with the flexibility to determine how a PPP collection service will be provided. To achieve a 75% diversion rate of residential PPP, recycling performance levels at MF buildings will need to be improved significantly beyond current levels. It is anticipated that by providing a financial incentive to a wide range of potential collectors and by allowing collection services to be tailored to the specific needs of each MF building, performance levels can and will increase. As MMBC will offer a market-clearing price for curbside collection and a market-clearing price for multi-family building collection, a mechanism will be required to separate the quantities collected from each source.</p> <p>3) The Recycling Regulation requires that MMBC achieve a 75% recovery target within a reasonable period of time. PPP that remains in the garbage stream is the responsibility of the local government.</p> <p>4) Section 5.2 of the draft PPP Stewardship Plan proposes criteria to establish reasonable access which are not distinguished for urban and</p>	No revision to PPP Stewardship Plan; to be considered during implementation

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	<p>Therefore, your plan should provide sufficient service in all areas of the province so that the additional costs of managing PPP materials in rural areas are not incurred by local governments.</p> <p>5) Also, though the plan commits to eliminating and reducing the environmental impacts of a product through innovations, it does not ensure that producers will modify the design of their products, given that there is a commitment in the plan to recover energy but no discussion about the disposal method of residuals. The plan should ensure that producers are provided with greater incentives to redesign their packaging, rather than creating a source of fuel for re-sale.</p> <p>6) We also encourage you to work with the provincial government on extending the PPP program to include the ICI sector within 3 years, as this sector generates more PPP than the residential sector.</p> <p>With respect to next steps, UBCM will be asking members to comment on your plan and whether or not the recommendations (both the core recommendations and those in the Appendix) from the UBCM policy paper were adequately addressed in your October 23 draft.</p> <p>Finally, it was noted that MMBC requested an extension for the submission of the Product Stewardship Plan for Packaging and Printed Paper. Our members have expressed significant concerns that such an extension, and the commensurate delay in implementation of the plan, would have considerable financial implications. As such, local governments wish to see MMBC meet the Recycling Regulation deadlines for submission of the stewardship plan on November 19, 2012, and implementation of the plan on May 19, 2014.</p> <p>We look forward to further collaboration on developing a plan that meets the needs and interests of our members and their constituents, including establishing a market-clearing price that reflects the true operating costs of local governments.</p>	<p>rural households. MMBC will be undertaking research into existing collection costs and will set financial incentives to act as a market-clearing mechanism for both urban and rural areas. Following research into collection costs in various areas and circumstances, the market-clearing prices may be set to reflect relevant cost drivers.</p> <p>5) Section 4.10 sets out cost allocation principles including a principle to encourage reduction, redesign and recyclability.</p> <p>6) Comment noted.</p> <p>MMBC is working to implement the PPP Stewardship Plan in May 2014.</p>	
Local government	Attached is our 3R program, what needs to be changed to be a collector?	Based on the document you provided there appear to be two aspects of your current curbside recycling program that would change: MMBC is proposing to accept a broader range of PPP in collection programs that is currently collected in the Village of Telkwa. PPP does not include beverage containers under deposit.	No revision to PPP Stewardship Plan

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Not for profit organization	I am wondering how "efficient" will be defined. The draft mentions that efficiency should be rewarded. Does this mean the only depots that can process high volumes of PPP will be selected? Or, might it mean that a depot that pays minimum wage would be selected over a depot that pays higher wages and offers benefits? I would like to see efficient defined if you have a sense of it at this point.	The more PPP a collector can collect or a processor can recycle using its available financial resources the more efficient it is. With regard to depots, MMBC will offer a market-clearing price to depot operators for each tonne of residential PPP it has collected that is accepted by a primary processor. Depot operators can drive efficiency by maximizing financial returns by maximizing the tonnes collected and minimizing the costs of doing so.	No revision to PPP Stewardship Plan
Private company	<p>MMBC, the Ministry of Environment and the Province of BC should encourage reuse of recycled materials in BC. This will have a profound impact on a number of aspects:</p> <ol style="list-style-type: none"> 1. Environmental benefits: This will reduce carbon footprint from transporting EPS waste to China, and the shipping of finished products back to North America. 2. Economic benefits: <ol style="list-style-type: none"> a. Job creation in BC – The manufacturing process for reuse of recycled materials in BC will help to create job opportunities in BC. b. Revenue generation in BC – The new products made from recycled materials can be marketed here in BC, to the United States and other countries. This will generate more revenue for businesses in BC. It will also generate more tax revenue (HST and corporate taxes) for the government. c. Encourage research and development activities: BC businesses will invest more in scientific research and experimental development to develop competitive and/or high value products that are made from recycled materials. <p>We, as one of the stakeholders for this new PPP stewardship program, ask MMBC and the Ministry of Environment to include the following measurements when developing the recycling program for PPP:</p> <ol style="list-style-type: none"> 1. Economic efficiency of the recycling services; 2. Carbon footprint for transporting and processing recycled materials; 3. Job creations in BC; 4. Revenue generation in BC; <p>Last but not least, manufacturers of the PPP products should be given priority to recycle and process these products. This is because manufacturers have better knowledge and experience on what to do with these materials. This will be a close-loop and zero-waste recycling solution.</p>	Thank you for your comments. One of the criteria MMBC will use to select primary processors is price which will, among other factors, reflect transportation costs. MMBC will require primary processors to report the destination of recycling end-markets which will provide information on the distance PPP travels to end-markets. MMBC will seek the most effective and efficient system for managing collected PPP.	No revision to PPP Stewardship Plan; to be considered during implementation

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Private company	<p>We are pleased to provide this letter as our corporate feedback to the consultation process currently being undertaken by your organization. We remain fully supportive of the Governments move towards an Extended Producer Responsibility program on all Packaging and Printed Paper products in the province of British Columbia. We hope that the feedback we offer below is helpful in your deliberations. Furthermore, we would be very interested to further engage with you, your organization and the government to ensure that this new EPR program is a success for all.</p> <p>GUIDING PRINCIPLES BFI Canada Inc. considers there to be a few guiding principles that need to be reaffirmed in order for this program to achieve its intended targets. These guiding principles are: • free, open and competitive markets that allow natural market forces to continue to develop throughout the province, and encouraging increased entrepreneurship and innovation in the industry; • monopolistic behaviours or centralized decision making powers must not be allowed to develop, driving prices up, and discouraging entrepreneurs from entering the market; • a Market Clearing Price cannot replace an open market, but rather be a tool of incentivizing increased collection and diversion rates throughout the province; • standards for collection and processing must remain and be maintained as high as possible, ensuring that materials are indeed being recovered and converted into new marketable products; • processing capacity and options must be determined prior to collection tenders being released; and • certify existing processors over 500 tonnes as primary processors, while ensuring the highest standards, and allow the existing market forces determine the most effective path for the products.</p> <p>RESPONSIBILITY MATRIX Ultimately, lessons from other jurisdictions in North America have provided some important insights for British Columbia and Multi Material British Columbia as it develops this new program. Most importantly, experiences from across Canada have found consensus around a responsibility matrix. In that the Government, Stewards, Producers and Processors/Haulers each have unique and important roles to play in a successful EPR program.</p> <p>Government: The role of the provincial government is to set the over arching policies and regulations, identifying the products that shall be recovered, and setting both the incentives and disincentives that will encourage this behaviour. Clearly, municipal governments throughout British Columbia have been engaged with recycling programs and are expected to continue to be so. There is no reason why an EPR program should necessarily change the existing relationships between municipalities and the private sector, as this relationship currently reflects the natural pressures of an open and</p>	<p>GUIDING PRINCIPLES: Offering market-clearing price financial incentives for collection services and utilizing an RFP for post-collection services is intended to support free, open and competitive markets. Collector and post-processing qualification standards will be applied. An REOI will be utilized to determine processing capacity and capability prior to entering into agreements for collection services.</p> <p>RESPONSIBILITY MATRIX: Thank you for your comments. AVENUES TO SUCCESS - Free, Open, and Competitive Markets: Offering market-clearing price financial incentives for collection services and utilizing an RFP for post-collection services is intended to support free, open and competitive markets. Avoid Monopolistic Behaviour: Offering market-clearing price financial incentives for collection services will allow multiple collectors to continue to operate in an open and competitive market. Utilizing an RFP for post-collection services will allow multiple companies to continue to operate in an open and competitive market while allowing the competitive bidding process to identify best value approaches and prices for the range of consolidation and transfer activities that will be required. MMBC is proposing to collect the broadest range of PPP currently accepted in any BC programs in all PPP collection systems. Market Clearing Price: Where a local government declines the market-clearing price offer for curbside collection, MMBC will tender for this service. The market-clearing price for multi-family building and depot collection will be offered to local governments and private companies simultaneously. The market-clearing price is intended to act as an incentive to encourage increase collection services and diversion. MMBC will provide stakeholders with an opportunity to review the proposed market-clearing prices. High Standards for Processing and Collection: Thank you for your comments. Process of RFP and Tenders: Thank you for your comment. Certified Processors: MMBC has indicated that price will be one of a number of criteria considered when selecting processors. Compliance with the processor qualification standards will be a minimum requirement.</p>	<p>No revision to PPP Stewardship Plan; to be considered during implementation</p>

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	<p>competitive market with competition in hauling and processing to the benefit of all tax payers.</p> <p>Stewards: The stewardship organization, in this scenario MMBC, is chiefly responsible for the monitoring, measuring and reporting of the program's success and failures. They must have access to all aspects of the recovery chain and be able to identify areas of improvement. They work with the government to better tweak the regulations and with the industries involved (producers, processors and haulers) to ensure that the program is achieving its targets.</p> <p>Producers: As the producers of these materials, they hold the primary responsibility for financially supporting the process that will recover their products and recycle them. In order for producers to continue to effectively implement and support this program it must be economically feasible, which is achieved through a continued support of open and competitive markets throughout the diversion process.</p> <p>Processors and Haulers: It is this industry that is responsible for delivering the infrastructure and capacity at competitive prices in the market place. If any of the above partners or processes interfere with the competitive nature of this sector the programs risks failure, either through monopolistic pressures on rising prices or through decreased standards that see no added processing capacity, innovation or markets being created for these goods.</p> <p>AVENUES TO SUCCESS Free, Open, and Competitive Markets As this new EPR program is rolled out in 2013, it is imperative that the market forces which currently exist in British Columbia remain in effect. It is these market forces which have helped British Columbia reach its current levels of recycling and diversion in the province, especially in the more populace areas. It is this growing and innovative diversion and recycling industry which should be encouraged to continue to grow through a new incentive driven EPR program, it will create jobs, start new businesses and grow existing innovators already in the industry. British Columbia's diversion industry is a green industry, and its future health should be of primary concern in the implementation of this strategy. The best way to ensure a healthy and vibrant diversion and recycling industry in the province of British Columbia is to ensure the continued operation of open and competitive markets. Open and competitive markets keep costs down, encourage innovation, and reward entrepreneurs interested in entering the market.</p> <p>Avoid Monopolistic Behaviour In order to achieve success and reach the provinces diversion targets, there needs to be</p>		

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	<p>a continued investment in infrastructure. If a single piece of infrastructure is allowed to develop or exhibit monopolistic practices not only will the entire industry begin to fail in British Columbia, but the system will fail producers as well. Ultimately, this investment is secured through the protection of a competitive market where entrepreneurs compete for business, innovation is incentivized and higher standards of processing are rewarded. The risk of a central clearing house establishing the price, contracting the processors and identifying the collection service providers is that incentives to improve the system will be eliminated from the market. As an example, if MMBC determines that product A is to be excluded from the approved processors, what incentive is there for future entrepreneurs to develop infrastructure to handle this product? Instead, we would encourage MMBC to develop an incentive based process where processors that improve standards or haulers that innovate collection are rewarded. This approach is to the long term benefit of the province if it aims to continue to develop a green industry in the province, create jobs and reward innovation.</p> <p>Market Clearing Price</p> <p>There has been some contradictory communications around how the Market Clearing Price would work in practice, and depending on how this eventually unfolds will have the greatest singular impact on the future success of the program. There are a few key points that we wish to make about the Market Clearing Price.</p> <p>First, it should be offered to municipalities, and if it is not accepted, then the contract should be made available to the competitive market through an RFP/tender process. The Market Clearing price should be seen as an incentive to encourage collection and processing of PPP products, not as the set or approved price in a given market.</p> <p>Second, it is important that the Market Clearing Price avoids becoming a tool in which centralized command and control mechanisms are utilized to develop a monopoly or allow anti-competitive practices to take hold. Rather, as we have stated before, this clearing price has the opportunity to serve as a key motivator and incentive to encourage increased diversion, and fair competition in the marketplace.</p> <p>Third, the overall operation and development of the Market Clearing price needs to be confirmed, and once the logistics have been identified, MMBC will need to consult with industry and other stakeholders again. There are simply too many unanswered questions at this point to adequately comment at this point. The first two points above would be the principles in which we would encourage forming the backbone of the finalized recommendation.</p> <p>It is important to avoid having arbitrary pricing and it is imperative that markets are allowed to function free of artificial interference. The goal of this EPR program clearly,</p>		

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	<p>should be:</p> <ol style="list-style-type: none"> 1. increase waste recovery and recycling of marketable packaging and paper products; 2. evolve a more vibrant diversion industry in the province; and 3. ensure that waste diversion away from ultimate disposal in landfill or incineration becomes an economically attractive option for British Columbia. <p>If market forces of competitive pricing and innovation are interfered with by the EPR program in BC, then all three goals will be difficult to achieve.</p> <p>High Standards for Processing and Collection</p> <p>Put simply, this program will have failed standards fall. Clearly, the goal of any EPR program is to improve recycling and diversion rates, and therefore, incentives for processors must be built into the process to allow for innovation, and improvements. Furthermore, if processors do not meet minimum standards and rates of diversion (i.e. material winds up in disposal at end of life) then they should be penalized, or simply removed from the approved processor list. If diversion of PPP material away from disposal is not achieved, and is not reported by MMBC then what will have been the point? The PPP Extended Producer Responsibility program increases the likelihood of developing marketable products out of this waste stream, and it will be important that every tool available to the province is used to ensure that this preferred outcome occurs. As a final point on standards, it is through incentives for processors and innovators where the greatest impact on improved diversion processes and technology developments can occur. These incentives would encourage green entrepreneurs to enter the market, and keep British Columbia on the map as a leader in this green, environmental stewardship and waste diversion industry.</p> <p>Process of RFP and Tenders</p> <p>It is our view that primary processors must be identified first before collections contracts can be put out to tender. There is no reasonable process where a hauler could accurately bid a contract without fully understanding where the product would be taken to. This is simply a comment on the order of the process to be followed.</p> <p>Certified Processors</p> <p>We recommend that the process for identifying processors of this material should be one of encouraging market competition, entrepreneurship and innovation, while ensuring that high standards are met. If a processor is prepared to invest in improved technology and environmental infrastructure, which improves diversion rates and the marketability of the product, they should be rewarded for doing so. Put another way, depending how the certification process works, there are two possible outcomes. Either the lowest cost processing with reduced standards over time, or, improved standards and diversion</p>		

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	<p>rates at competitive market prices will be rewarded. The government and MMBC need to decide which their priority is and define a system of certification that helps them reach this goal.</p> <p>CONCLUSION</p> <p>The Government of British Columbia has an interest in promoting diversion. Diversion can best be accomplished if access to the resource remains competitive, which will keep overall costs down to producers, and if a "diversion industry" is allowed to grow up around the initiative. This industry will create jobs, invest in infrastructure and technology development, and put British Columbia on the map as the leader in waste diversion and development. At the very moment government plans to grow the tonnage of recyclable materials available, it would make little sense to constrict the amount of entrepreneurs available in the market to manage the materials.</p> <p>With increasing segmentation and the evolution of materials in the waste stream, BC needs a flexible public policy environment that encourages innovation and creativity, through existing and disruptive technologies, to drive and enhance local diversion recycling markets and opportunities. We believe that the best way to achieve this preeminent goal is to allow the market to continue to operate naturally, with proper incentives for processors, and competition around pricing and service delivery.</p> <p>BFI Canada is in support of the developing concept of the new Packaging and Paper Products extended producer responsibility program in British Columbia. However, it is important that some of the finer details continue to be worked through with industry partners to ensure that this new program does not interfere with the future growth and development of the diversion industry in the province.</p> <p>We believe that achieving this goal is possible and attainable and present the following comments to help aid Multi Material British Columbia achieve its objectives:</p> <ul style="list-style-type: none"> • maintain free, open and competitive markets; • continue to encourage innovation, entrepreneurship and investment in the provinces diversion industry; • provide disincentives for monopolistic behaviours and avoid centralized decision making; • ensure that the Market Clearing price does not replace the open and competitive market; • incent high standards for collection and processing; • determine primary processors prior to collection tenders being released; and • certify existing processors over 500 tonnes and ensure standards are reflected in the market and reporting principles 		

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Private company	We collect single stream recycling at the curbside, we bale the product for transportation efficiencies and send to a MURF. I am unaware of any MURF that would take a product with glass, as well it would pose a WORKSAFE problem for our staff in the baling process. Please include Glass only at Depots as you have with Plastic Film and Styrofoam	Thank you for your comment on the collection of glass.	No revision to PPP Stewardship Plan; to be considered during implementation
Private company	<p>Page 1: “mitigate any potential temporary loss of environmental performance” - Every time a municipality puts out an RFP for a new collection or processing contract, it, in effect, replaces and rebuilds its program without any impact or “temporary loss” on environmental performance. Explain how any program, even if it was “gutted” with a new philosophy/approach, would impact environmental performance.</p> <p>Page 1: “economically efficient” - Not the lowest cost? At what point is a program considered economically efficient?</p> <p>Page 3: “not considered packaging “ includes “Beverage containers governed by Schedule 1 to the Recycling Regulation”, “Empty oil containers...”, “Empty paint and stain containers and aerosol containers...” and “Empty antifreeze containers...” - All of these materials do and will arrive at the processing facilities. What is to be done with the materials under these categories? How will the cost of the management of these materials be covered off?</p> <p>Page 6: “continuous improvement in recovery effectiveness and efficiency without undermining existing PPP recovery efforts in British Columbia” - How would a “greenfield” solution undermine efforts? If anything, would a greenfield solution not provide for even higher/greater recovery of all/more and more types of materials?</p> <p>Page 6: “effective economic incentives will drive behaviour that increases recovery activity” -Recycling is primarily a “fixed cost” system. Incentives may help incrementally increase recovery marginally, but if used as the basis for payment, structured incorrectly can lead to economic difficulties and shortfalls in delivery.</p> <p>“simple rules will provide clarity and certainty to those collecting and recycling PPP” - Define simple. What would constitute “complicated” for comparison purposes?</p> <p>“innovation is the result of complex interactions of ideas and efforts among producers...” - The approach proposed in the plan provides little to no incentive to innovation as prices are set at a moment in time for collection contractors for a fixed period; processors do not have long term guaranteed tonnages against which to monetize innovations; and there is no central control where ideas can be filtered and implemented in a harmonized manner. As such, innovation will be stifled.</p> <p>“Set the stage for evolution” - Because of the incremental approach being proposed, systems will, as in Ontario and Quebec, built for a moment in time in order to keep costs</p>	<p>Page 1: Changing all service providers across BC represents a different order of magnitude of change management than changing a sub-contractor where the local government continues as the primary point of contact for the service. Page 1: Economic efficiency encompasses more than lowest cost. Economic efficiency involves use of resources, including but not limited to financial resources, to maximize the system’s output. Page 3: The description of packaging in Section 3 is for purposes of producer obligation. If these materials are included in the collection system, they will be managed. Composition audits will determine if the volume of these items is material. Page 6: Changing all PPP service across BC represents a significant change management challenge and may disrupt existing patterns of recycling. Page 6: Recycling exists now only where someone, generally a local government, is prepared to pay for the service. This payment operates as an economic incentive. The PPP Stewardship Plan proposes to replace local government payments for PPP services with a collection incentive system and payments for post-collection services based on outputs. The objective is to establish rules that are simple to understand and simple to administer. Complicated rules would be inconsistent, confusing and an administrative burden. Collectors are able to innovate at any time to reduce costs and maximize their profit under a market-clearing price financial incentive. Processors will have the same access to ‘long term guaranteed tonnages’ as under current local government contracts. Page 7: Collection incentives have been used effectively in producer responsibility programs for a number of materials, such as WEEE and tires. The Manitoba PPP offers incentives to municipalities for PPP services. Collector and processors qualification standards will be developed, working from examples of best practices in existing contractual arrangements, and will be reviewed with stakeholders. It is unclear that a single call-centre for the Province of BC would provide better service than local governments</p>	No revision to PPP Stewardship Plan; to be considered during implementation

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	<p>in check. “Anticipating” program changes and additions will result in excessive costs being passed onto stewards with no benefits to stewards until and only once (if?) the changes are made. Brownfield development/changes are incrementally more expensive to implement.</p> <p>Page 7: “Qualified collectors will be offered financial incentives for PPP collection. The value offered will be established as market-clearing prices.” - Provide an example where market-clearing prices have been successfully implemented for the collection of PPP. So, examining the likely rollout of the process....the MCP is set by MMBC. The municipality goes to collection contractors and gets an indication of whether or not they would be able to deliver the collection service for a price lower than the MCP. With a positive response from the private sector, the municipality accepts the MCP. Then the municipality puts out a tender for services (they won’t need a full RFP because MMBC will be setting the standards). The prices come in. The municipality accepts the lowest tender price. With it being below the MCP, the municipality “pockets” the difference, even after adding in their costs for the other services (minimal in comparison). Stewards/brand owners overpay for the services. Why would MMBC not simply go to the market in each defined area and get the private sector to bid directly, in a fair and open marketplace, thus resulting in the lowest DIRECT cost to stewards with no “middleman”, i.e., municipality to keep the “gravy”? Considering there are extremely limited data available for the collection of the (to be) expanded list of materials and EVERY municipality is different, thus really needing ITS OWN MCP, and that market clearing prices have been a terrible failure in Ontario (that is for HSWs) and in Russia through their market controls, and even as far back as 1980 when the Liberal Government put into place the National Energy Program or his wage and price freezes, setting market prices has never been successful. As costs go up, fixing a price will ultimately lead to defaults or loss of service as companies/municipalities look to “find” the money to cover shortfalls. Conversely, if the MCP is set too high, stewards/brand owners will overpay for the services.</p> <p>Why is a MCP even needed? Is there a perceived shortage of supply or excess of demand for collection services? Generally, one has to “play” with a price to determine the relative impact on supply or demand to even understand what the “good” market-clearing price is. And, unfortunately, even with this, the MCP that is set is only good for that moment in time for that specific location. Each area has its own MCP contingent on the demographics, mix of materials, generation rates, wage rates, cost of goods, etc. Therefore, it is not feasible, practical or responsible to set a market clearing price for a service that varies across a region with economic and demographic inconsistencies.</p>	<p>continuing to act as the first point of contact for their residents. If MMBC cannot reach an agreement with the local government to provide streetscape garbage collection service in parallel to the PPP streetscape collection service provided by MMBC, MMBC will not provide streetscape service.</p>	

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	<p>Also, with no experience in running collection fleets for recyclables, to suggest that the team that will set the MCP is qualified, even if a market-clearing price could be set, is plain and simply imprudent.</p> <p>“MMBC will establish a set of collector qualification standards that will include basic qualifications common to all PPP collectors.” - Provide a full definition of the standards.</p> <p>“MMBC will offer a financial incentive to local government...for the provision of a bundle of services that includes PPP collection services, public education, promotion and first point of contact for collection service customers; and” “Where the local government...declines the offer...MMBC will issue a tender for collection services...and will provide public education, promotion and management of collection service customers through its own means.” - Why the duplication of services? Assuming 60 municipalities accept the market-clearing price, that means there will be 61 (i.e., 60 municipal and 1 MMBC) public education and promotion campaigns and 61 call centres “answering” residents’ questions on the program. There will be no harmonization of the services, the public education, the promotion, the responses, overall messaging and/or the communications. There also, because of the duplication of services, is a redundancy and increase in overall management and administration costs to stewards/brand owners.</p>		
Private company	<p>Page 8: “To service multi-family dwellings...MMBC will offer a financial incentive...” “To operate depots for receiving PPP from residents...MMBC will offer a financial incentive...” “To service streetscapes in areas that meet the reasonable access criteria...MMBC will offer a financial incentive...” - The comments as outlined for the bolded sections of Page 7 apply equally to the collection of materials from multi-family dwellings, depots and streetscapes. Setting a market-clearing price (or incentive as suggested) is even more dubious for these sectors. With respect to public education and promotion, management and call centre services, duplication results in no harmonization, inconsistent messaging causes confusion and increased costs.</p> <p>“MMBC may issue a tender for PPP streetscape collection services, may select a service provider and provide public education...” - Why only may? The EMA Sec5(1)(d)(ii) indicates that materials from streetscapes must be collected as part of the program.</p> <p>Page 9: “Setting appropriate market-clearing prices is important to drive effectiveness...” “...should reward and encourage continued efficiency by those who can deliver the service at less than the market-clearing price while encouraging initiatives to reduce costs where costs exceed the market-clearing price.” - If the market-clearing price is set too low, there will be no takers, thus there will be no “encouraging initiatives to reduce costs”. For the most part, collection is a fixed cost system, not a variable cost system. Trucks have to drive past each house over the set collection period and pick up the</p>	<p>Page 9: A market-clearing price, by definition, generates the desired activity. Setting the market-clearing price important will be an important activity. Section 4.4 notes that the market-clearing price can be set at a flat rate per tonne accepted for processing by a primary processor or at a flat rate per household serviced, or some combination. The frequency of adjustments to market-clearing prices has not been determined. Bid prices will not be adjusted. As the primary processor is providing post-collection services including consolidation and transfer, the primary processor is accepting the PPP at the transfer facility. Page 10: The PPP to be collected will be identified in the REOI. Collector and processors qualification standards will be developed, working from examples of best practices in existing contractual arrangements, and will be reviewed with stakeholders.</p> <p>“Output to recycling end-markets per tonne received” reflects the performance of the MRF (PPP received, residue and PPP marketed). “Market revenue received” is the commodity revenue received for PPP marketed. As these are evaluation criteria (not qualification standards), compliance is not relevant. Processors, in responding to the RFP, can determine whether to process to a particular grade and reflect that cost</p>	<p>No revision to PPP Stewardship Plan; to be considered during implementation</p>

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	<p>materials. The Plan does not even define whether single stream or two stream collection is required, both of which would have its own market-clearing price and different downstream processing requirements having different costing structures. Setting a market-clearing price does not respect the costs of the entire recyclables management program, only the collection side. It is short-sighted and will result in the lowest cost collection program at the expense of over inflated processing costs to compensate.</p> <p>“A clear definition of the outcome being priced: The market-clearing price can be set at a flat rate per tonne accepted for processing by a primary processor...” - Per tonne collection pricing results in increased levels of residue as the contractors are paid on a per tonne basis. The added weight does not materially affect their collection costs because the trucks are volume limited. Slightly increasing compaction rates will compensate for the added space taken up by the added weight. The result is the processing contractors are going to have to increase fees to compensate for processing non-recyclables for which they will not be compensated. The collection contractors do not even necessarily add materials. Rather the added weight can result from less curbside inspection. In fact, the municipal program for garbage management, including bag limits and user pay programs can result in increased weight into the recycling program as residents look to find a “replacement” for the reduced garbage service (witness the City of Toronto with greater than 20% residues in their recycling program resulting from the move to user pay volume limited carts for garbage, collected weekly. Collection is not a “weight based” service. It is a “per household” service.</p> <p>“Since MMBC’s objective is to increase the collection of PPP, the market-clearing price will be benchmarked against a baseline performance standard” “Measured as kilogram per household served by dividing total tonnes collected by households served.” - Considering that the mix of materials and the generation rates of materials will vary by individual municipality because of demographic, household characteristics, sizes of households (literally and number of people per household), etc., how can this be done without constant auditing of all streams of materials in all seasons (seasonality is also very important)? This will require a full time, large audit staff to have any opportunity to arrive at “reasonable” numbers (statistically valid will be another issue).</p> <p>“Setting market-clearing prices to drive collection activities is an iterative process that will be monitored and adjusted to reflect changing conditions.” - At what frequency will changes be made? At what level? Provincially? By area municipality? By program? If there is a change required in the MCP, will that same change, in percentage terms, be added to those private sector companies that competed and won through tenders?</p> <p>“Post collection services include receiving PPP from collection vehicles, picking up PPP</p>	<p>and commodity revenue. MMBC is incorporated with associated powers and rights. Producer responsibility programs for PPP in other jurisdictions implement compliance activities to monitor PPP to final destination. Page 11: Primary processors selected by MMBC will have the same assurance of tonnages as they currently have through contracts with local governments.</p>	

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	<p>from depots, consolidation and transfer where required, handling and sorting PPP...” - Does the collection contractor get paid for “successfully delivering materials” if they drop them at a transfer station, who in turn bulks them and ships them to a MRF for processing? The TS operator does not “need” to worry about quality, levels of residue in the loads, etc. Where does the responsibility for the quality of the materials lie in this instance? Once bulked and transferred it will be impossible to track back to the source (i.e., where multiple sources go through one transfer station).</p> <p>Page 10: “MMBC will engage PPP primary processors on a contractual basis using the following process: 1. Issue a Request for Expressions of Interest...to gauge processors’ capacity to receive, process and market a defined list of PPP received from collectors.” - What materials are being collected? What quantity of each material will be delivered to the MRF? What is the mass balance? How will the material be collected? Single stream? Two stream?</p> <p>“Processors will be provided with the names and locations of qualified contractors participating in the MMBC program. This information will allow processors to make arrangements with these qualified collectors as required in order to respond to the RFP.”</p> <p>- Provide an example where this has been done for PPP in the past successfully. Is MMBC anticipating multiple processors will “set up” across the province? Who sets the “standards” for quality of material acceptable at the facility? How is the processor supposed to pay for the cost of setting up a facility when the contract length with a collection contractor will be limited to the length of the collection contract? Collection contracts are typically 5-7 years consistent with the average life expectancy of the trucks. Processing contracts set up to match will result in highly inflated capital cost per throughput tonne matched to the collection contract. With the cost of a new MRF for 100,000-120,000 tpy two stream MRF in the \$25 million range and single stream well in excess of \$30 million, over a five year period, the capital cost alone over five years and 110,000 tpy would be a minimum of \$40 per tonne for two stream and even more for single stream. Over 15 years, with guaranteed contracts, the cost per tonne drops to about \$20 (at 5% interest). For smaller plants, the costs will be even higher. Stewards/brand owners will pay the difference. Also, processors will not be able to borrow money without guaranteed contracts, whether they are borrowing from a bank or internally financed. The cost to manage the program for the processor will also be inflated because of having to “manage” each of the collection contractors. Additional “risk” costs will have to be added to account for “off sides” in the quality of inbound materials. Simply suggesting that the processor can reject a load if it is not acceptable is naive in the thought process. With fixed run-time costs, the processor cannot idle his/her</p>		

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	<p>staff because of inbound quality. The processor has to “deal with it” by slowing/adding staff/both to accommodate the material quality. Plus, if the outbound materials are of lower quality because of the quality of the inbound materials, again the processor will suffer. But the processor won’t “suffer” instead will build in more cost as a risk buffer to account for the inevitability (yes it is inevitable – look at ANY program over time). The proposed approach set out in the plan is at best flawed, at worst untenable, and will certainly result in overly inflated prices for the delivery of service. The stewards/brand owners will ultimately pay more in the uncontrolled environment (albeit it is perceived the environment is controlled – it will not be).</p> <p>“The RFP will solicit information to allow MMBC to confirm a processor’s ability to meet processor qualification standards set by MMBC.” - Define the qualification standards. Considering that 70% (or more) of the households in BC do not collect the anticipated list of materials (i.e., a minimum of the addition of mixed plastics), how will MMBC be able to define if the contractor has the ability in the facilities in place in BC to manage the material stream proposed? What timelines would MMBC provide for the plants to “come up to a standard” such that they would then qualify to process the extended list of BC materials?</p> <p>It is obvious that the plan has given no consideration to rationalizing the needs to the anticipated requirements for processing in the facility. This will result in exaggerated costs to stewards/brand owners similar to that seen in Ontario.</p> <p>“Processors will be qualified based on compliance...standards and evaluation criteria including but not limited to price, location, capability, capacity, output to recycling end-markets per tonne received and material revenue received.” - Explain what “output to recycling end-markets per tonne received means” in clear and simple language. This sounds like a measure of recovery rates, but the measurement of recovery rates is undefined. Explain “market revenue received”. Considering that markets engage the world and BC doesn’t even register in the grand scheme of tonnes of recyclables generated, the values received will be contingent on world markets and, other than meeting market specifications, there is little that can be done by the processor to improve on that model (other than company-specific relationships). Therefore, define how a processor would be out of compliance with requirements. Also, where is the cost-benefit analysis where a processor may choose not to process fibres to generate a #8ONP, instead selling it all as Mixed Paper garnering a lower market value, but overall, the net cost is lower to the stewards (i.e., market value decrease < cost to process)? How would that be brought into the evaluation?</p> <p>“MMBC will also consider its contract administration including, for example, audits and</p>		

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	<p>compliance activities for in-province and out-of-province processors and recycling end markets.” - Does MMBC have jurisdictional power outside BC? How will MMBC be recognized? How will MMBC be able to ascertain that the materials they are “auditing” or the processing activities they are reviewing for “compliance” are actually reflective of the management of the materials from BC? Realistically, MMBC will not be able to control activities or even be able to confirm material management and end market activities outside of the province unless they physically follow the materials and examine their management in a real-time basis over an extended period (months).</p> <p>Page 11: “Arrangements between qualified contractors and processors will be left to the discretion of the parties through arrangements made in the free-market. Free-market negotiations between primary processors and collectors offer the best opportunity to maximize the quality of materials.....” Processors will thus be responsible for striking a contract with MMBC for the “right to process”; with the collection contractors for the materials to process; with the end markets for the delivery and payment for materials. Each contract process introduces increased administration, increased risk, increased exposure, increased auditing and, ultimately, increased cost to stewards/brand owners. It would be better to have one relationship for processing with MMBC and MMBC directs collection contractors to the acceptable facility and guarantees tonnages for a prescribed period of time. The processor will have the guarantee necessary against which to expand, borrow money, be innovative, etc. The administration will be reduced, lowering costs to stewards/brand owners. If there is an issue surrounding quality (i.e., not to the point of rejection, but to the point where it impacts processing capabilities and potentially product quality), the contractual relationship would be such that facilitation, mediation, arbitration goes through the central body ultimately responsible for the delivery of the program. There is too much grey area in quality – a sliding scale ultimately affecting the processor’s ability to process to an acceptable level to be paid for processed tonnes. The approach proposed will not succeed without the stewards paying an inflated price for the delivery of the service.</p>		
Private company	<p>Page 12: “Names and locations of recovery end-markets and disposal locations.” - If the processor processes a material to meet an end market specification for an EFW facility (e.g., a special derived fuel as is common in Germany) and markets that material to an EFW facility (i.e., for a net positive or negative market value), will the processor be paid for that material? Energy recovery, albeit the lowest level on the waste hierarchy, is considered acceptable in BC.</p> <p>Who is responsible for the cost of residue generated in the MRF? Assuming the processor meets all required recovery rates, there will, by default, be residues requiring</p>	<p>Page 12: The pollution prevention hierarchy requires that materials be recycled before recovery of energy can be considered. Section 5.4 indicates that system residues processed to meet recovery end-market specifications (not EFW) will be considered recovery. The RFP will identify costs to be included in the bid price, including the cost to manage a specified maximum level of residue. Disputes between a resident and its local government are to be resolved by the parties. Disputes between residents and MMBC are to be resolved by the</p>	No revision to PPP Stewardship Plan; to be considered during implementation

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	<p>management. Some of the material will be recyclables uncaptured by the process (NO process is perfect) and much/most of the residue will be non-recyclables. Considering the processor had to “process” these materials (i.e., recyclables and non-recyclables), how is the processor supposed to recover the costs associated with the management of residue materials. What is the compensation for residue rates at say, 5%?, 7.5%?, 10%, 15%?, 20%, >20%. At what point is a stream considered not acceptable? In Ontario, the last two major RFPs moved to pay on inbound tonnes to the MRF with processors responsible for the cost of residue management as the incentive to increase recovery rates. This resulted in cost increases for processing of more than 50% compared to the previous contracts.</p> <p>“Dispute Type: Resident” “Path of Escalation/Resolution” “Discussion with MMBC Management” - Explain how this works if the collection contractor is the municipality and there is a dispute with the resident?</p> <p>Page 13: “The Recycling Regulation requires that, as part of the stewardship plan, MMBC design and deliver an effective resident education program that achieves two overarching objectives:” If that is the case, why are municipalities involved/required to deliver the resident education program under the Right of First Refusal provisions in the Plan? Adds confusion; no harmonization; variable messaging – lowers chance of success/maximizing efficiencies/ effectiveness. Who is responsible if the education program is not successful?</p> <p>“identify the various audiences who will participate in the PPP stewardship program by sorting, collecting, processing and recycling PPP and assessing each group’s information and P&E needs; - Does this mean that the collection and processing contractors are to outline their suggestions for P&E needs?</p> <p>“contain a call to action and motivate appropriate behaviour” “perceptions and reported behaviour against which to track and assess changes pertaining to year-over-year performance.” - Appropriate “behaviour”? Define. By whom? What happens if there is “inappropriate” behaviour? What happens if a resident continually puts out unwanted materials? Do you refuse collection of their materials? How is that person re-“motivated”? How does that person get reinstated? Who decides acceptable/appropriate behaviour and inappropriate behaviour? Are there by-law officers included in the administration requirements at the municipal level to monitor/police “appropriate” behaviour? In reality, regardless of the industry/service, it is VERY difficult to motivate appropriate behaviour when the service is “free”.</p> <p>“to undertake this in cooperation with local governments and other who have developed and operate successful, mature recycling programs;” - Define “successful”. The most</p>	<p>parties. Page 13: Local governments have existing relationships with their residents. MMBC will assess the information and P&E needs of each group. Appropriate behaviour is effective participation in the available collection systems. Page 14: MMBC will consider linguistic needs as part of its process to understand resident audiences. Collector and processor contracts will be administered by MMBC. Page 15: The list of PPP to be collected will consider types and categories of PPP. R&D activities and financial arrangements have not been defined. Commodity revenue is one of the factors in determining cost-benefit. Activity based costing will be used to inform cost modelling. MMBC is responsible for the cost to collect and process PPP, including ONP. Page 16: ‘In all areas’ relates to ‘collecting the full range of PPP for which there are existing markets’, not to ‘existing markets’. Through the PPP Stewardship Plan, MMBC is providing notice to collectors and processors that it wishes to procure services to manage the proposed expanded list of PPP.</p>	

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	<p>successful programs doing PPP typically have reached only a 60-70% recovery rate. What does the Plan specifically include to “push” the rate to the required 75% - particularly considering it is not even planning on including all PPP?</p> <p>Page 14: “comprehensive P&E messages across geographic and cultural demographics” - Will the P&E be tailored to each culture? Will it be available in multiple languages? “MMBC will directly administer collection and processing services including dispute resolution, communications to BC residents and performance reporting to the BC MOE.” “MMBC will outsource producer registration...payments, audits and compliance...” - There is no mention of contracts. Once the contracts are established, will they be administered by MMBC staff or will they be outsourced to a third party? Outsourcing compliance suggests possibly third party administration of contracts. If a third party, what experience will that third party have in administering contracts in this field? If MMBC is not administering contracts, will the third party be included in the development and striking/signing of the contracts?</p> <p>Page 15: “Producers that supply types of PPP that are currently not recyclable...” - Define “not recyclable”? Just because MMBC may choose not to include a “category” of materials as not having ready markets, does not mean that there are not materials within that category that are not recyclable. This is patently unfair to those stewards/brand owners/packaging manufacturers that have managed to figure out/use a recyclable package within a “non-recyclable” category. With this approach proposed in the plan, there is no incentive to use recyclable packaging within a “non-recyclable” group/ category. This will in turn stifle innovation in packaging types which is contrary to the hierarchy and to the premise of the regulation.</p> <p>“Research and development (R&D) to resolve technical and market capacity barriers...R&D efforts will include: Establish processing capacity; and Establish end-market capacity and demand” - Define more clearly. Does this mean that money will be put into a “pot” which processors and end markets will be able to draw funds to set up processing capacity/capabilities and end markets will be able to set up the capabilities to process previously defined “unrecyclable” materials?</p> <p>“Allocation of program delivery costs to reward producers that supply recyclable PPP for which there is market demand and high commodity value and to encourage producers that supply PPP for which there are no end markets or limited markets with low commodity value to consider reduction, redesign and recyclability” - Why the focus on high commodity value? Why not focus on the cost-benefit? Does this mean materials with low values, such as films, should look at reducing films or moving to a rigid at the</p>		

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	<p>expense of the environment, i.e., utilizing more natural resources? This is completely contrary to the intention of the Environmental Management Act which, by definition, and intention, is a Design for Environment regulation, NOT Design for Recyclability.</p> <p>“Where costs are incurred for commingled materials, allocation of costs to each category of PPP reported by producers using a cost allocation model informed by composition audits, cost allocation studies and other analyses to identify the relative cost share for each category of PPP” - Activity-based costing on a basket of goods is suspect at best particularly in an ever-changing environment, such as recyclables management. Much is dependent on the mix, quantities, timing of the ABC modelling/data collection, size of facility, degree of automation/sophistication of the operation, market timing (e.g., whether or not a material is being separated relative to its market value at that moment in time), etc. In the proposed piecemeal approach without harmonization, the costs will vary across the province. Inefficiencies in the system can inflate management costs. To be able to “approximate” more closely the cost for the management of individual materials, it would be more prudent to set up a “model” program. In other words, with proper harmonization and a justification of infrastructure relative to the required work, a “truer” cost for the management of materials would be possible.</p> <p>On another note, considering that newspapers are continually decreasing as a percentage of the recyclables stream, in order to recover ONP, it is almost to the point where that material will have to be positively sorted in order to achieve the same quality as will be coming out of Europe under their new regulation for ONP. How will these costs be covered if ONP is only paying in kind contributions? Who will pay the real costs associated with managing ONP?</p> <p>Page 16: “Collecting the full range of PPP for which there are existing markets in all areas of the province will require adjustments to the majority of collection programs and by the primary and downstream processors that receive the collected material.” - Considering the above statement, what verifiable, accurate and representative data are available upon which to set a market-clearing price? Why must there be “existing markets in all areas”? Materials can be shipped. Considering many/most processors will not be able to manage the potential (anticipated?) mix of materials as only 30% of households do mixed plastics today, how is MMBC proposed to qualify processors in the short term? What timelines will processors be given to meet the minimum requirements? What are the minimum requirements? How long will be it be before requirements are known? What if there is no way by which existing processors can meet the requirements in a given geographic area?</p>		

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	<p>If processors were told that all materials must be managed, and were given adequate notice, facilities could be established (with proper contractual arrangements) to meet the needs of the stewards/brand owners/the program by the proposed implementation date. “The benefits of this incremental approach to expand the scope of the collected materials include: It builds on the existing recycling programs collection and processing systems in a logical, environmentally and economically prudent manner;” - Define environmentally prudent. Economically, it is the worst case scenario. Brownfield changes to processing facilities are always more expensive than greenfield development. If processors, in their MRFs “leave space” for the “possibility” that “a material or two” could be added “at some point” in the future, i.e., within the life of the contract, then the stewards/ brand owners will pay for the real estate (i.e., floor space) and the conveyors within that space. MRFs are not “modular”. Ultimately, to add a material will not only cost more, it could affect the cost of the management of other materials. Overall, the system costs will increase much more under this proposed approach. Examples can be provided in support of this statement.</p> <p>Page 12: The pollution prevention hierarchy requires that materials be recycled before recovery of energy can be considered. Section 5.4 indicates that system residues processed to meet recovery end-market specifications (not EFW) will be considered recovery. The RFP will identify costs to be included in the bid price, including the cost to manage a specified maximum level of residue. Disputes between a resident and its local government are to be resolved by the parties. Disputes between residents and MMBC are to be resolved by the parties. Page 13: Local governments have existing relationships with their residents. MMBC will assess the information and P&E needs of each group. Appropriate behaviour is effective participation in the available collection systems. Page 14: MMBC will consider linguistic needs as part of its process to understand resident audiences. Collector and processor contracts will be administered by MMBC. Page 15: The list of PPP to be collected will consider types and categories of PPP. R&D activities and financial arrangements have not been defined. Commodity revenue is one of the factors in determining cost-benefit. Activity based costing will be used to inform cost modelling. MMBC is responsible for the cost to collect and process PPP, including ONP. Page 16: ‘In all areas’ relates to ‘collecting the full range of PPP for which there are existing markets’, not to ‘existing markets’. Through the PPP Stewardship Plan, MMBC is providing notice to collectors and processors that it wishes to procure services to manage the proposed expanded list of PPP.</p>		

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Private company	<p>Page 17: “The audit sampling protocol will involve a sufficient number of samples and sample points over multiple seasons and years to be considered reasonably statistically valid.” - Define sufficient. Define sample points. Define “reasonably”.</p> <p>“...producers will be required to increase the recovery rate from BC’s baseline recycling rate to the 75% target recovery rate.” - With not all materials being included (i.e., as suggested in the Plan), the target will ultimately fall to fibres, glass and steel. How will the fees compensate for the added burden placed on those materials? The structure will be established to manage a fixed, smaller list of materials, thus leading to higher costs for some materials (i.e., as costs are allocated over a smaller list of materials). How will these materials be compensated for being recyclable?</p> <p>“...limits on the quantity of garbage that can be set out for collection, reducing the frequency of garbage collection, changing fees for garbage collection and/or banning PPP from disposal.” - All of these measures tend to drive more garbage/non-recyclables into the recycling stream. How will processors be compensated for the increasing quantities of non-recyclables that will inevitably end up in the facility?</p> <p>Page 18: “MMBC is committed to building the residential PPP collection and recycling system in BC to deliver the required 75% recovery target within a reasonable time.” - Define “reasonable time”.</p> <p>“Effective and efficient collection services within their geographic and/or demographic context.” - Define geographic and/or demographic context. If the municipalities have the Right of First Refusal, how does this relate to the above statement? In that instance, would the collection services not be defined by the municipal boundary, regardless of the geographic and/or demographic context?</p> <p>Page 19: “Reasonable access to collection service for PPP will be provided: For single-family households through – curbside collection in areas currently receiving curbside collection of garbage which can be serviced for the market-clearing price offered by MMBC. – Depot collection for PPP in areas which can be serviced for the market-clearing price offered by MMBC” - There is no reference to the possibility that the private sector could be provided an opportunity to undertake collection services. Is there going to be an opportunity for the private sector or has MMBC established that municipalities WILL be the service providers and that the private sector will ONLY be provided an opportunity through municipalities? With no bidding process, ultimately the stewards/brand owners will pay more than necessary. Also, there will be no harmonization as each municipality provides the messaging to its residents.</p> <p>“For streetscapes...in urban commercial areas with business activities that generate</p>	<p>Page 17: Statisticians will define sufficient and reasonably statistically valid. A sample point varies by the type of auditing. For example, a sample point for curbside audits is material set out by one household. A cost allocation methodology will be developed in consultation with producers. Quality of collected material will be monitored as part of the auditing process. Page 18: MMBC requires data on PPP supplied to BC residents reported by producers in order to understand the current system performance and estimate the time required. Geographic context means the geographic characteristics in the collection area. Demographic context means the population and household characteristics in the collection area. Page 19: Where local governments decline to provide curbside collection for PPP in areas currently receiving curbside collection of garbage for the market-clearing price, the private sector will be invited to bid to provide the service. The market-clearing price for depot collection will be offered simultaneously to local governments and the private sector. The example of the refill pack is provided to illustrate an initiative to reduce the environmental impacts of a product throughout the product’s life cycle. Page 20: The example of ‘micro-bubbles’ is provided to illustrate an initiative to reduce the environmental impacts of a product throughout the product’s life cycle. These environmental impacts are not measured solely in the product’s recyclability. PVC is proposed to be included based on the advice of a plastics processor that it can be mechanically sorted and markets are available. Page 21: Producers have access to the information sources cited. The left hand column of the table in Section 5.4 includes excerpts from the Recycling Regulation. Fees are paid based on weight of PPP supplied, not units supplied. Refer to the principles of cost allocation in Section 4.10 of the Draft PPP Stewardship Plan. The cost allocation references apply to the areas over which producers have control i.e. reduction, redesign and reuse. MMBC can direct collected PPP to recycling and therefore does not rely on the cost allocation process as a mechanism to influence this outcome. Section 5.4 indicates that system residues processed to meet recovery end-market specifications (not EFW) will be considered recovery. The RFP will identify costs to be included in the bid price, including the cost to manage a specified maximum level</p>	<p>No revision to PPP Stewardship Plan; to be considered during implementation</p>

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	<p>large amounts of PPP;” Define “large amounts”.</p> <p>“The refill pack is manufactured of a lightweight material producing less waste.” - In many instances, the refill is a multi-laminate pouch which is not proposed for inclusion in the new PPP Program. How would moving to a non-recyclable benefit the steward/brand owner under this program, particularly with respect to the fees paid?</p> <p>Page 20: “This can be achieved through the use of “micro-bubbles” incorporated into the plastic.” - Material Recovery Facilities pull volume and pick pieces. A heavier weight per unit in a cost allocation basis is technically better as the processor gets paid on a per tonne basis. Decreasing the weight per unit means more work is done to get paid the same tonne processing fee, resulting in a higher cost per tonne managed. The steward “saves” in having less weight in the packaging, but “pays more” in having to pay the higher cost per tonne managed. Explain how light-weighting of packaging is beneficial to keeping the cost per unit to the steward/brand owner down.</p> <p>“In some cases the bamboo sugarcane and/or bulrush has replaced the use of PVC, which is a known recycling disruptor.” - If PVC is a disruptor, why is proposed for inclusion in the recycling program? It is not recycled. It is included in the “mixed plastics” stream that goes to a market, but at that point, the end market screens it out and discards it. How will the Plan account for materials that are “blended” into a “marketable” stream only to be discarded downstream at a reprocessor? Ultimately, those materials (and PVC is not the only one) end up devaluing the higher market value materials as they “pay” because of the materials that have no value in the mix.</p> <p>“Companies are redesigning packaging so that it is more easily recycled by, for example, harmonizing the plastic resin of a cap with its bottle.” - This is not an issue. In fact, PET bottles with PP caps are very acceptable. The PP is separated off at the reprocessor and sold and/or used separately. With PP values being so high, it is quite acceptable. How will stewards/brand owners be compensated if they were to redesign their packaging to use similar resin caps? Considering PP is a lower density, less resin is used per cap, which respects the waste hierarchy. How will this be addressed in the fees paid by stewards?</p> <p>“For example, paper liner in expanded polystyrene meat tray” - The liner is not paper, rather a bladder material with a composite inner liner to absorb liquids. It is a contaminant if left on the XPS tray particularly because of the organic matter within its content. A strictly paper liner is still a contaminant and would even result in more organic matter transferring to the XPS tray.</p> <p>Page 21: “Information on PPP end-of-life management compiled by MMBC during implementation of the PPP stewardship plan will be an additional source of information</p>	<p>of residue. MMBC will not have data on the quantity of PPP supplied ‘by jurisdiction’ and cannot calculate a recovery rate on this basis.</p> <p>Page 23: The plan does not propose to reflect reductions in the environmental impacts of packaging and printed paper in the fees paid and does not propose to seek compensation from the MOE for continuous improvements in environmental performance. Those with an interest in the management of PPP can include environmental and consumer groups that have no interest in collecting or processing PPP.</p> <p>Page 24: The presentation at the February 14 workshop indicated that the comments received would be compiled into a consultation report for MMBC and considered by project team while preparing final reports due to MMBC by mid-March. The consultant did not indicate that the comments would be made available. The Consultation Summary for the Draft PPP Stewardship Plan provides responses to all comments and sets out if and how the comments were reflected in revisions to the PPP Stewardship Plan. Page 25: If written submissions received and stakeholders meetings between November 12 and December 14, 2012 do not lead to revisions to the plan submitted on November 19, 2012, an updated plan will not be submitted. Page 26: Alternation means “To change or make different; modify”. Separating, sorting, baling, compaction etc. are forms of changing or modifying. Section 5.4 indicates that system residues processed to meet recovery end-market specifications (not EFW) will be considered recovery. Schedule 5 defines ‘the packaging and printed paper product category’.</p>	

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	<p>for PPP producers as they consider opportunities to reduce the quantity of PPP supplied as well as design PPP with the environment and recyclability in mind.” - Why is MMBC not referencing the vast number of bodies looking at this very issue? Product Stewardship Institute, Sustainable Packaging Coalition, Global Packaging Forum, Product Policy Institute, and right here in Canada, pacNEXT and Eco-Entreprises Quebec have all and/or are all working on programs/guides/etc., to help stewards/brand owners in packaging design.</p> <p>The Plan is remiss in not recognizing or taking advantage of the vast body of knowledge in the marketplace on packaging design and management and not leveraging their experience/knowledge in developing a plan that truly is consistent with the Environmental Management Act and the expectations of the province government. Why reinvent the wheel?</p> <p>“Reduce the environmental impact of producing the product by eliminating toxic components and increasing energy and resource efficiency.” “PPP stewardship plan encourages reduction through cost allocation which rewards companies who reduce the weight of PPP sold into the market.” - Explain how this will work. With a piece-based and volume based allocation methodology to processors and a volume based allocation methodology to collectors, explain how cost allocation will benefit those who implement reduction measures. Unless total costs decrease, the costs per unit weight must increase.</p> <p>“Redesign the product to improve reusability or recyclability” “PPP stewardship plan encourages redesign through cost allocation.” - Explain how this will work. Provide a working example. (See note above on last point).</p> <p>Page 22: “Reuse the product.” “PPP stewardship plan encourages reuse through cost allocation” - Explain how this will work? Reuse is simply “deferred disposal”.</p> <p>“Recycle the product.” - Why is there no “encouragement of recycling through cost allocation”? This would suggest that it will be better to NOT be included in the program similar to Ontario.</p> <p>“Recover material or energy from the product.” “Primary and downstream processors will be encouraged to further process system residues to meet recovery end-market requirements and minimize the amount of residue sent to landfill.” - Again, does this then mean that processors will be paid for materials sent to EFW/WtE facilities and/or who generate a Refuse Derived Fuel/Special Derived Fuel? If this is, in fact, true, why not then include all PPP in the program and let those materials that current “do not have a market” be “marketed as an RDF/SDF or sold off for energy recovery. There is a lack of consistency in the application of the waste hierarchy to all PPP. Why must some</p>		

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	<p>potentially “pay a penalty” by exclusion, going to landfill where the plan in this section recognizes the value of energy recovery?</p> <p>“Operational effectiveness indicators characterizing program performance such as: recovery rate expressed as a percentage of the province”. - How will the plan develop a plan for continuous improvement if it does not know the recovery rate by jurisdiction? Extensive knowledge of generation rates and characterization is required in each jurisdiction in order to determine efficiency. What happens to those jurisdictions that are “underperforming”? What if a jurisdiction that is under performing under the administration and operation of MMBC through contract (i.e., rather than through a municipality)? Who is responsible for poor performance? Who will be responsible for improving performance? What repercussions could fall to the service delivery providers? In areas where there is a market-clearing price, it may be that the price is not sufficient to meet the requirements for continuous improvement. How will this be measured? There are numerous other questions about reporting and operational effectiveness. Suffice it to say, the plan is inadequate in its understanding of what to look at and how to look at it and what to do in light of “poor performance”. Without an understanding of how systems operate on a daily basis, it is not possible to establish reasonable implementation expectations.</p> <p>Page 23: “Environmental impact measures...” - Define. Greenhouse gases? CO2 emissions? Heavy metals? NOx? SOx? Particulates? How will they be measured? How are reductions in the environmental impacts of packaging and printed paper reflected in the fees paid? What compensation from the MOE will be sought in exchange for continuous improvements in environmental performance?</p> <p>“Should this be the case, MMBC would not be obligated to provide third-party audited financial statements as part of its annual reporting but reserves the right to choose to do so.” - Is it MMBC’s intention to undertake a third-party audit of the finances of the organization on an annual basis? What financial auditing will be expected within the municipalities and service providers? It would be beneficial for audits of municipalities to be undertaken to compare the market-clearing price to the actual cost for the delivery of the service. This would help MMBC better set the market-clearing price for subsequent contracts. Otherwise, stewards/ brand owners will continue to be subjected to fees higher than necessary as would have occurred in an open and free marketplace.</p> <p>“For the purposes of consultation on the PPP stewardship plan, the following are considered stakeholders: Those with an interest in the management of PPP.” - Define the difference between “those with an interest in the management of PPP” and “those potentially interested in delivering services under the PPP stewardship plan...”</p>		

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	<p>Page 24: “Comments received by November 9, 2012 will be summarized in Appendix C together with responses from MMBC describing if and how the comments were addressed in the final version of the PPP stewardship plan submitted to the Director.” - The presentation given by the consulting group in February following the release of the Phase 1 report indicated that all comments would be recorded and made available. Although it was later discovered that a report with 150+ pages of comments was prepared, it was never released to the public and no substantive changes were made reflect any comments received. Considering the level of time and effort put into commenting into the process to date, what assurances does anyone have that comments will, in fact, be reviewed, addressed and incorporated into the final version of the PPP stewardship plan submitted to the Director?</p> <p>Page 25: - “An updated PPP stewardship plan may be submitted to the Director in early January 2013.” - Why “may”? Again, outline what assurances there are that comments in this secondary consultation period between November 12th and December 14th will, in fact, be reviewed, addressed and incorporated into an updated version of the PPP stewardship plan submitted to the Director?</p> <p>Page 26: “Processing – Manual or mechanical alteration of PPP for the purpose of resource recovery” - Is this definition related strictly to the manufacture of RDF/SDF? MRFs do not “alter” materials (other than typical baling/compaction); they do identify/separate/sort. ”Recovery Rate – Calculated as a percentage with the numerator representing the quantity of PPP recycled or recovered and the denominator representing the quantity of PPP available for collection.” “Recovery Rate % = Recovered (material utilization) x 100 Available for Collection” Material utilization suggests that EFW/WtE will be included in and count towards the 75% goal. Is this in fact true? The Environmental Management Act defines “Recovery Rate: The amount of product collected divided by the amount of product generated, expressed as a percentage.” By the definition suggested in the plan, the 75% target is directly measured against the product category, i.e., PPP, whereas the MOE EMA definition refers to the product within the product category, i.e., material specific. The plan does not meet the requirements of the EMA as defined.</p>		
Private company	I strongly suggest that milk containers be excluded of the list of PPP materials. A recovery rate higher than 75% could be achieved by introducing these containers into an already existing, streamlined collection system.	Schedule 1 of the Recycling Regulation excludes milk containers. Therefore, milk containers are included in the packaging covered by Schedule 5 of the Recycling Regulation and are therefore included in the Draft PPP Stewardship Plan.	No revision to PPP Stewardship Plan

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Private company	We have a full service bottle depot and recycling centre that accepts all the materials in the draft list of the PPP plan, excluding styrofoam. We collect, sort, and bale recyclable materials at our facility. I noticed that we were left out of the list of processing facilities currently operating in B.C. I would welcome the opportunity to discuss our potential role in the PPP plan. I look forward to hearing from you.	Thank you for contacting MMBC. A member of the MMBC project team will call you to discuss your PPP services.	No revision to PPP Stewardship Plan
Private company	<p>I have many concerns about the haste with which this new PPP EPR policy is scheduled to be introduced, without sufficient, careful examination of both the positive and negative effects this policy could have upon existing operations within BC.</p> <p>While the policy's focus seems to be on the promise of “producer paying 100%” and the achievement of some recycling efficiencies, there appears to be insufficient detail(s) concerning the overall implementation of these promises. The old adage of “be careful what you wish for” could apply, especially if these promises are unfulfilled.</p> <p>We must all review this document, keeping in mind the economic realities in BC communities; the downstream effects on recycling these products, including projected changes to existing systems within the province; whether there are alternative methods of achieving the intended outcomes; and, the possibility that increased taxes are the only method of offsetting any failures of this policy to achieve the stated goals.</p> <p>This rush to pass this proposal seriously limits the time to properly review it and I would urge an extension be granted for policy analysis and submission of comments such that all stakeholders can properly review all effects on their communities and on the environment.</p> <p>Concern: lack of time for stakeholders</p> <p>As a stakeholder, I am a private recycling business offering both depot service and subscription curbside collection in our community all ready. Our recycling depot/One Stop Drop/Resource Recovery Centre is also a collector of many other EPR programs. Our innovative forward thinking recycling business is also a primary processor. Our business is contracted by local government to collect some of the materials listed as PPP items. Our company currently collects items not listed as PPP items, such as books in our mixed paper as well as plastic film and garbage bags in our plastic film recycling program.</p> <p>As a stakeholder, I am an advocate for local business and local economy, zero waste and no incineration. I am a waste reduction educator and researcher and I am from a rural community with transportation challenges as well as economic challenges. . I am also a resident in a single family dwelling and am a residential recycler.</p> <p>All stakeholders are not involved in this process because of the lack of information and</p>	<p>Concern: limited information available to all stakeholders – An organization, whether ‘business, not for profit or government’ may accept the market-clearing price to provide depot collection services and may also respond to the RFP to provide post-collection services. Where residential PPP is commingled with ICI PPP or with non-PPP materials, a factor will be applied to ensure that MMBC is paying only to manage residential PPP. MMBC is not intending to design the collection system for any community but rather allow local governments, private companies and not-for-profit organizations accept the market-clearing price offers for the appropriate types of collection services. MMBC is proposing to provide resident education where private companies provide collection services in order to establish a communication channel with residents to support its administration of the collection contractor.</p>	No revision to PPP Stewardship Plan; to be considered during implementation

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	<p>education, particularly individuals like ordinary residents and taxpayers, as well as our elected officials. There has been little educational information for the public, that would inform them/us of what items will be accepted, how it could change their/our current recycling efforts, how will it affect prices of products at the point of purchase, how it will affect the contribution they/we make to local taxes and all of these are questions that need answered before even thinking of signing onto this plan. There has been very little information on how this policy will affect local government budgets for recycling. There has been no tangible numbers to make an informed decision or choice. Many local elected officials are uninformed and have difficulty commenting on the unknown factors that this policy paper presents.</p> <p>Some of the stakeholders that have been closely involved in this process of designing this PPP EPR policy paper, could be classified as “doubledippers” since they sit on some other not for profit boards, for profit boards and organizations such as the RCBC, CWMA, Retail Council of BC and MMBC and have close financial interests as private profit generating businesses or have the crossover of being local government and directors of non-profit organizations. Listed are a few examples to point out that “all stakeholders are not involved.”</p> <p>Concern: limited information available to all stakeholders.</p> <p>In section #4 in the plan titled “Program Design” it does not address the complexities of existing program designs. For instance a facility may be both a collector and primary processor; they may also be a business, not for profit or government. They may take multi materials, they may commingle for transportation, they may have source separation, and they may mix and or transport tin cans with white goods or other metals and or have commercial materials in their /our programs already. They may already be able to handle and collect glass and polystyrene and plastic film and bags and may already have a higher diversion rate handling many more items and materials then the program being proposed???</p> <p>Each community’s recycling programs have unique challenges and or geographic impediments and or limitations. And factoring in local community solutions for given challenges means that a one size fits all ‘solution” might be detrimental not only to the financial challenges each community has but what negative environmental implications might come with an over simplified program designed by non-residents for any given community. An example of over-sight in this plan is while government gets a financial incentive for education, a private facility that is both a private enterprise collector and primary processor, in this proposed PPP EPR plan, a private recycling business, according to this PPP EPR plan, are not acknowledged as delivering public education</p>		

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	<p>and promotion which is erroneous, thus not being compensated for these services and cost. These kinds of over-sights can be made by making assumptions and not investigating the unique challenges of each and every recycling program.</p> <p>There may be many valid reasons for the unique designs of communities recycling programs that an outside steward, consultant or producer(s) would not be aware of. The PPP EPR program design as written now, does not acknowledge that existing recycling programs that are already integrated into the fabric of a communities recycling program, may already be taking items and materials not listed in this PPP EPR program. Most communities have successful programs already designed to take mixed paper which includes books (not a PPP item) and plastic garbage bags or bulk packaging (not PPP items).</p> <p>Many current community recycling programs are designed not just for the PPP acceptable materials but are designed for the overall needs of the community and any given challenges a community might have. MMBC does not assume the responsibilities but instead supplants the control of the recycling of the listed items PPP EPR only. The local government is still responsible to deal with any of these PPP EPR listed products as well as all the other materials in the discard stream that are not “successfully” recycled.</p> <p>This plan does not release local government from the responsibilities of overseeing and insuring that there are both programs and services in place to manage “discarded materials”.</p> <p>If producers actually paid 100% of costs for PPP EPR materials, then local government should have no additional costs. But if there is only 75% diversion of the PPP EPR materials, from the waste stream, that would mean 25% of the packaging is likely to go into tax funded programs (ie; landfill).</p> <p>There is little indication that local government’s responsibility will be diminished, particularly with the ongoing responsibilities of making sure that all the community’s “recycling and discard management” needs are serviced.</p>		
Private company	<p>Concern: I do not believe that an organization made up of producers that make products and packaging should control what a community does with recyclable materials. I do not think that large foreign corporations have the commitment to local communities or the knowledge to take-over this responsibility at the local level. I do not believe that consultants not living in a community, have the practical knowledge or information to dictate the design, costs or implementation of community recycling programs, especially if a community has programs in place that surpass what PPP EPR proposes.</p> <p>Can we be sure that a large corporation wanting to minimize costs will not insist on</p>	<p>Concern: The market-clearing price is intended to offset the cost of collection. Primary processors will be paid by MMBC to provide post-collection services. Material revenues will be retained by MMBC, subject to revenue sharing arrangements with primary processors.</p> <p>Concern: MMBC will undertake research into current collection costs (including resident education) prior to setting the market-clearing price. MMBC will review the market-clearing prices with stakeholders. MMBC is proposing to provide resident education where private companies</p>	No revision to PPP Stewardship Plan; to be considered during implementation

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	<p>“recycling” systems that are not beneficial to the community or environment? While there are concerns by municipalities of increasing recycling rates, for example, of refundable beverage containers by expanding deposit fees and giving fair compensation to collectors, producers decided that they did not want to pay an increase in deposit fees and that some of the producers felt that Waste To Energy was “a viable recycling alternative”.</p> <p>Ontario PPP Producers have also promoted WTE as a method of recycling. I do not agree that MMBC are assuming responsibility for 100% of the recycling of these PPP EPR products and I do not agree with them controlling recycling systems for the very example as seen in Ontario.</p> <p>The two core elements of separating collectors and processors will create more cost and paperwork and more bureaucracy. According to the PPP EPR plan, the contracting for collectors and processors is two separate and different functions. In the first function, collecting contracts are awarded and in the second function, processors must bid on an RFP. So what happens if the current collector and processor are only contracted for one part of the function? Our business model for the past 10 years, for example, is based on performing both functions. So, without the processing part, we and many other handlers and service providers could be forced to take materials to processors who do not pay us the same revenue stream currently received. In the PPP EPR plan, could an ‘approved’ processor under pay an ‘approved’ collector, who also may be a competitor of the approved processor?</p> <p>Concern: Business and local government are expected to agree to a program that does not clearly define what the market clearing price is. Local government and existing businesses have little input into what this financial incentive called “market clearing price” is. Instead the payment is calculated by the stewards, who decide the costs that they want to pay for collecting and processing services.</p> <p>Again, why do local governments receive a financial incentive to provide public education but a private company already providing educational services does not? The “approved contracted” service provider should provide public education and it is the service provider that often incurs these costs and it is the service provider who may have firsthand information on the kind of public education that is required. If PPP EPR claims to take the responsibility of managing these PPP EPR materials off the shoulders of “local governments”, why is local government being compensated for education? If local governments are given the responsibility to educate, and are paid for these services, how does this “diminish and takes the weight off of local government” or does it just give compensation for an action, “education”? My experience with other EPR</p>	<p>provide collection services in order to establish a communication channel with residents to support its administration of the collection contractor. The market-clearing price offered to local governments will include resident education because local governments commonly provide information to residents on a range of issues.</p>	

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	<p>programs is that as the collector, we must pay to promote and educate about the and given EPR program we run in our community. The local government also must pay to promote the EPR programs on their websites and with educational materials. Often an EPR program provides brochures and signage that do minimal educating and do not promote the location of the local facility, in the individual communities.</p> <p>How is this EPR program going to cover the full costs to all, for advertising and education? Advertising is one of the costs incurred by businesses, government and non-profits, and what about all the other costs and including the fixed costs or costs to improve or maintain recycling programs? Will these costs be covered?</p> <p>Market clearing price “the price that sellers want to sell and buyers want to buy at” in this case is the price the steward (the producers of the products) wants to give. “An effective market –clearing price should reward and encourage continued efficiency by those who can deliver the service at less than the market-clearing price while encouraging initiatives to reduce costs where costs exceed the market-clearing price” as stated in the MMBC plan, suggests that there will be different fees for different communities, not everyone will be equally compensated and that this MMBC “market clearing price” financial incentive will not pay for all the true costs of community recycling programs and it will not pay all the true costs for improvements in the recycling system. The PPP EPR statement, also suggests that those with greater costs will be penalized, by insufficient payment for services rendered. This statement also promotes our interpretation that “the purpose of this proposed PPP EPR program is too guarantee that the stewards and producers pay as little as possible and place financial pressure on already struggling municipalities and recycling businesses, to collect more with less.”</p> <p>This PPP EPR plan does not promote and support keeping collected materials as high quality products or promote environmental beneficial choices. If producers and this PPP EPR steward organization is actually taking responsibility for these listed products and their end of life management, would there be such an emphasis on cost reduction at the collectors and processors end, or would there be more emphasis on product re-design changes and changes in consumers purchasing habits? Are we still going to have consumers complaining about the amount of packaging that they bring into their homes with purchases that create discarded packaging that they have to manage? Does this policy paper acknowledge that in the pricing of products, consumers are already paying for the cost of materials used in packaging the products they consume and does it guarantee that prices of products will go down as less packaging is used? Is there a commitment by producers to educate consumers to buy products that have less packaging? Is this stewardship plan just a system to allow producers to continue</p>		

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	<p>manufacturing and selling poorly designed products and packaging that steadily increases that amount of discarded resources, needing to be managed at the household?</p> <p>Concern: Market clearing price does not promote reduce, re-use, a collection system of high quality recycling or support local community and the local economy. A flat rate per household does not take into account rural costs or population densities or distances from processors. Reviewing the flat rate fee in Manitoba's program I see challenges such as, while the City of Winnipeg would receive \$98 per tonne , Winkler Manitoba, a neighbouring border community, would receive \$157 per tonne and Flin Flon, a more remote Northern community would receive \$157 as well. Winkler, while a small population, is closer to urban markets and processors and while smaller than Winnipeg, it would share similar transportation costs and benefits by being more like and urban location, closer to the larger city processors. Does the \$157 per ton cover the costs of recycling in Flin Flon and getting their materials to markets? Flin Flon's non-profit recycling organization has to undertake a community fund raising effort for the total of \$100,000, to purchase a baler, to improve recycling efficiencies; I would imagine this is an example of the PPP EPR financial incentive, not paying for increased efficiencies, the very efficiencies the PPP EPR plan states it supports. I also noted that "costs above the clearing market price paid, were the sole responsibility of the municipalities and payments were on a three year rolling average of the net costs of participating municipalities", so while a community may have unique challenges and costs, they are paid an average flat fee for the services rendered. This PPP EPR "one size fits all" model of funding and compensation does not pay for all current costs incurred by municipalities, so any "stratification" to accommodate changing circumstances is not immediate.</p> <p>Price level or quantity of financial incentives, including best practices allocations and performance allocations that in Ontario's program results in some communities only being paid less than a third of their net costs. Again, this kind of payment system has created actions businesses and municipalities that do not support local industry but supports the shipping of dirty commingled recyclables to China, it has created additional costs to some local governments, to build, for example, new systems (\$6,000,000 for one MRF in one community) and also supported the promotion and support for incineration, as a recycling solution, in cash strapped communities. It should also be noted that the data to determine the payment for services rendered is based on data collected by the stewards, from municipalities, from two years prior. Meaning, the payments for services today are based on figures and data from 2 years earlier. This</p>		

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	<p>might not match or pay for the current costs</p> <p>Does this kind of payment incentive, the more you collect for less, the more you get, collection system really reward communities for their recycling services? Or is this type of PPP EPR payment system more in keeping with something closer to cheap disposal services, creating needlessly high residuals streams, using ineffective collection methods, with WTE and landfilling as quick and convenient solutions at the end of the pipe? It is in the PPP EPR plan that it says in essence, the plan says “we support the constant improvement in recycling these PPP materials”. Is there constant improvement in the proposed PPP EPR system? Or, as in 2011 in Winnipeg, who experienced a decrease in materials collected, there is not an improvement there. Does every community get the same opportunities? Or will it be like Manitoba where there seems to be a limited and selective number of communities that are supported with funding for educational programs and supplying technical assistance for helping to improve collection and only a limited number of communities receive these benefits? The contractual and business arrangements that the proposed MMBC policy plan means that both businesses and local government must change their business and operational plans, perhaps even their infrastructure, to accommodate the unknown coming with PPP EPR. Issuing RFPs for the lowest bidder for processors could harm many existing local recycling operations that have been the recycling pioneers, already moving diversion targets of newspaper, mixed paper and plastic to new highs.</p>		
Private company	<p>Concern: This proposed PPP EPR policy and plan is creating a bureaucratic maze of redundancy and double reporting when the processor is also the collector. There are two distinct systems for receiving recycling contracts and a facility that is both collector and processor has to apply or be contracted for one part of the work and bid on the other. So what happens if our local recycling depot is a collector in our community and their bid to be a processor is turned down? Now this depot, as collector, has an additional cost of trucking materials to a processor who does not pay the amount for materials that the collector would have received by taking the materials to market themselves, now the MMBC PPP EPR plan will limit how this facility can do business. So this will cause a negative impact.</p> <p>Dispute resolution is one sided, because all the power is given to the steward. While in the early days of Ontario’s blue box program there were lawsuits between the stewards and several municipalities. This took place and there is evidence of lawsuits between the steward and municipalities, who claimed “they were not paid or they were not paid the agreed amount”, legal action is very costly for local government or non-profits and small business. The producers as stewards become the major voice of how the program will</p>	<p>Concern: A collector that is currently processing some or all of their collected PPP can submit a bid to provide post-collection services to MMBC or can collaborate with one or more primary processors to consolidate and transfer PPP as part of their bid. There have been no lawsuits between municipalities and stewards in Ontario.</p> <p>Concern: Producers will pay fees to manage the PPP collected through the MMBC program, not through the garbage system.</p> <p>Concern: MMBC is proposing to collect recyclable PPP.</p> <p>Concern: The costs of managing PPP will be shifted from local government property taxes or utility fees to the cost of packaged and printed paper products and do not represent a new cost of living.</p> <p>Concern: Section 5.4 indicates that system residues processed to meet recovery end-market specifications (not EFW) will be considered recovery.</p>	No revision to PPP Stewardship Plan; to be considered during implementation

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	<p>operate and they set the rules. There must be a more balanced dispute resolution for fairness for all.</p> <p>Each region in BC does a SWMP as regulated by the Provincial MOE. There is both a financial cost to taxpayers and costs in the time to write these plans, review these plans, and change if PPP EPR alters community SWMPs. In each of these SWM plans, there is recycling data, including tonnage collected of materials and there are also plans to increase diversion. We now are being asked by MMBC to have more administration and data collection for these materials, to be made into a report for MOE, at a cost.</p> <p>Concern: How much is this new added administration cost, to local government, business and consumers in this PPP EPR program going to be? What is the percentage that will be sliced off the available fees for administration by the stewards? We already note that tax funded programs will pay for the disposal of the 25% not diverted but this fee will be kept by stewards. And what if a given community has an inferior collection method that generates a higher level of contamination that sends more contaminated recyclables to the landfill and or incinerator? Who pays for the landfill infrastructure and hauling costs? And given these simple scenarios, how come the stewards get to keep the money by not having to pay for these materials since they are not in the PPP EPR stream that does not see this material go to recycling markets? So how much money will actually be filtered down to the communities? Will stewards be paid market place price or will they establish their own administration costs? When MMBC promotes this EPR program as “producers pay 100% of all costs” this is not factually accurate. In many BC EPR programs such as batteries, florescent tubes and bulbs there is funding from eco fess gathered to pay for consultants, for administration costs to be covered as well as the transporters to also be compensated by stewards but no payment for the collectors who must assume the risks and costs of the program including labour, taxes, infrastructure while eco fees are promoted as paying for “all the recycling costs” for these materials. How is this PPP EPR program going to be different? If some municipalities in Ontario do not get 50% of there blue box costs now and in Manitoba municipalities do not get 80% of their blue box costs now, are we just going to be paying some stewardship organization for a new hidden “consumer tax”?</p> <p>Concern: Including non-recyclable materials in the PPP EPR program that is about collection of recycling and recyclables, falsely promotes that these materials are being actually recycled, not disposed of. If products are non-recyclable, why is the MMBC not contributing financial incentives to curbside garbage collection costs then? Is this program forcing communities to collect these non-recyclable items that are designed for destruction, with a plan to incinerate these materials, thus promoting WTE, then how</p>		

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	<p>does this jive with the Recycling Council of British Columbia’s No Burn policy which states: “there is no burning in ZERO WASTE and this is both the ZWIA (Zero Waste International Alliance and the RCBC policy”. What data supports that these PPP EPR materials will be redesigned, as claimed for so many years now? A recent paper written for the Grocery Manufactures Association in regard to advances in sustainable packaging, pointed out that packaging change and or redesign may mean less tonnage going to landfill, less emissions through using lighter materials and better design. But currently, much of the packaging material is still not recyclable.</p> <p>A review of comments made by an industry source in Ontario regarding changes to fee structure, displayed reluctance from producers of hard to recycle items to pay more and to pay for current disposal. Who then must pay for community recycling system changes, including new and different equipment, in response to the producers proposed changes in packaging? If a system has to take materials that they can not sell as a recycling commodity or reuse, are stewards prepared to assume the actual costs of bringing this material into a local system? If only one style of recycling is used that causes problems with machinery if plastic bags, polystyrene and glass enters the system, why on earth would any community use such a backward way of handling recyclables? Is WTE going to be the one size fits all disposal/recycling solution?</p> <p>CONCERN: If a hidden fee is added to the cost of our consumables, how will an increase in the price for most products purchased by residential consumers, effect the cost of living in small communities in BC? What will be the increase per unit sold? What happens to the many shoppers living along BC borders who will choose to buy products at a lower price in the United States or Alberta, that have no fees charged for the recycling of these materials, who pays for the recycling of these materials? MMBC’s aspiration includes expanding the collection system to accommodate a uniform province –wide list of PPP materials available for “recycling”. While this is a commendable goal, how is taking in for recycling something like rigid plastics in a remote northern or ferry access community, going to take into account, the costs may be excessive and the carbon emissions of transportation wasteful? Could it not be more beneficial for these communities, to reduce the plastics coming into the community and perhaps have access to refillable containers instead? Developing local markets and reuse of materials locally takes capital investment; there is no indication that there would be funds available from this program to support such endeavors, which is raising the bar. Starting new local businesses to recycle or make use of these products takes feed stock and a supply stream Will this steward controlled PPP EPR recycling program circumvent valuable feedstock which could be used by BC Industry and businesses? Several years ago,</p>		

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	Ontario blue box recycling was reported as sending dirty recycling and blue box leftovers to China, in news stories. At the same time stewards and government staffers and some politicians took paid junkets to China and other Asian communities to source out “recycling” markets local in China for blue box recycling. Is this something the same producers of products in Ontario, supposedly with the same level of responsibility PPP EPR will have here in BC, and the same producers and companies who will now belong to a different stewardship organization in BC will do here? Is this what we can expect here in BC? Where in this document does it say we will foster BC recycling industry and businesses? Where does it say that BC recycling industry will be protected?		
Private company	<p>Concern: This policy paper does not address the many questions on how this stewardship program will be delivered. In fact, reading the life cycle management section in this PPP EPR policy brings nothing new to the recycling table for BC communities. While the producers may strive to reduce their environmental impacts, any redesign may not mean the container or packaging is more recyclable and there is a viable “recycling” market for them. The amount of packaging in the marketplace is increasing, the number of products in the marketplace is increasing, the amount of discards is increasing and costs are increasing to handle these products. This PPP policy arrangement does not pay the full costs, because communities do pay for the environmental impact on their communities, communities pay for the economic impact of both the products and the discard management systems, while this policy only partially supplements the true costs to communities.</p> <p>The waste hierarchy in this proposal does not give specific actions that will be taken by producers or stewards. If reduction of what we consume is the first step in the waste hierarchy, this PPP EPR “recycling” program is meant to continue consumption of products and sales of products and manufacture of more products and poorly designed and excessive packaging. PPP EPR is a program to make collection convenient and easy, making discarded items go away, so we can buy. Reusable packaging that is refilled or used repeatedly is not stipulated or supported, and reducing weight of packaging does not encourage reuse of glass and does not mean the lightweight materials used will make the items more recyclable. Transporting inefficiencies and emission issues transporting lightweight materials, for example, the steward handling beverage containers are filling transport trucks with non-compacted plastic water bottles and non-compacted aluminum cans. So, even light weight packaging materials generates a huge carbon foot print and a waste of financial resources shipping non densified materials.</p> <p>There is no evidence that there will be redesign of products that will make them more</p>	Concerns: MMBC may influence but cannot dictate the types of packaging producers choose to use.	No revision to PPP Stewardship Plan; to be considered during implementation

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	<p>recyclable using “cost allocation” in this program with a fee charged more for items that supposedly are harder to recycle. There are many marketing factors associated with the design of products and the bottom line is if the product sells producers are happy. There is nothing that addresses packaging changes effecting costs to communities to recycle and re-educate. In many of the EPR materials that I handle on a daily basis I see new models of products being recycled on a regular basis. I see no reduction in using battery operated equipment because there is a battery recycling stewardship program. We as a society continue to consume and discard at an alarming rate, how does this PPP EPR program address that what is really needed is behavior changes, that may conflict with the producers desire to sell more products?</p> <p>If the stewards control the recycling programs, will reuse programs have to cost less than recycling in order for reusers to be accepted by stewards? If glass is reusable as a container, will the PPP EPR “cost allocation” pay for glass to be refilled as a container? Will PPP EPR pay for glass to be reused as a container? So will the producers of glass have to pay more while producers of some plastics will pay less? How will this cost allotment translate into highest and best use? Recovering energy or waste to energy (Burning) is not an environmentally responsible option and it is not supported by the RCBC and ZWIA who are against burning. Does this not pose a conflict position, since several RCBC boards of directors also work for MMBC? Does this mean that either the RCBC must support WTE or does this mean MMBC must abandon WTE as a “recycling” option?</p> <p>Concerns: This PPP EPR policy “waste hierarchy” does not guide people to changing lifestyles by reducing items consumed and discarded. The discarded materials may become garbage in another community. There is nothing that reduces the toxicity of packaging materials ie; plastics. As an example there is no ban on BPA plastics used in food and other packaging. There is no conservation of resources and both burning for energy and burying are part of the promoted PPP EPR hierarchy. Problem packaging is not restricted from sale by producers or banned in this policy .Therefore this plan is not in keeping with Zero Waste policies or follow the principles of Zero Waste. Yet the RCBC support Zero Waste? Does this mean MMBC does not?</p> <p>“Zero Waste is a goal that is ethical, economical, efficient and visionary, to guide people in changing their lifestyles and practices to emulate sustainable natural cycles, where all discarded materials are designed to become resources for others to use. Zero Waste means designing and managing products and processes to systematically avoid and eliminate the volume and toxicity of waste and materials, conserve and recover all resources, and not burn or bury them. Implementing Zero Waste will eliminate all</p>		

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	<p>discharges to land, water or air that are a threat to planetary, human, animal or plant health.”</p> <p>Zero Waste involves moving from the back end of waste disposal to the front end of resource management “If a product can’t be reused, repaired, rebuilt, refurbished, refinished, resold, recycled or composted, then it should be restricted, redesigned, or removed from production, resold, recycled or composted, then it should be restricted, redesigned, or removed from production.” In the review of this PPP EPR policy paper, I find there are too many questions unanswered on how this program will be delivered. How much it will cost? How much will it contribute to local recycling initiatives already performing and progressing? What is the benefit of this program? And what will become of the hundreds and hundreds of existing small to medium recycling businesses and not for profits as well as some exceptional municipal and regional recycling programs here in BC. I see the support of there being less diversity and an increase in monopolies. This policy paper is like the shoe salesman trying to make a sale without first finding out if the person wants shoes, without measuring the foot and determining if the person can pay for the shoes. Most consumers are not going to buy the shoe without seeing if it fits first but the MMBC is expecting local governments to buy this program without seeing how it will effect staffing, budget, local economy and environment.</p> <p>There is evidence produced by a recent study “Evaluation of Extended Producer Responsibility for Consumer Packaging”, commissioned by the Grocery Manufacturers Association which brings to light, even more questions about the cost efficiencies of a PPP EPR program, as well as the diversion benefits particularly since both Manitoba and Ontario EPR program was reviewed for this study.</p> <p>Until we all can make an informed choice about this program with tangible outcomes and delivery methods, backed by real numbers for costs and payments, as well as true ZERO WASTE goals, I cannot endorse this plan.</p> <p>Finally, we must look very carefully at who has been hired to help design this PPP EPR program here in British Columbia. We see many instances of “conflicts of interest” and as I mentioned earlier, “double dipping” by certain stakeholders who have vested interests in the outcome going a certain way. Is the playing field truly a level one? Are all stakeholders truly welcomed in this process?</p>		
Private company	Glass collection in the blue box – collecting the glass in the blue box and mixing it with paper, and plastics and metal containers was appealing at first and played a positive role in getting the community onboard and involved in the recycling journey. But after many years of involvement in this concept, and after hearing continuous and legitimate concerns from the downstream market (such as paper mills, plastics recycler, aluminum	Thank you for your comments on glass, PS foam and plastic film and on the need for financial, social and environmental considerations in the delivery of the PPP Stewardship Plan.	No revision to PPP Stewardship Plan; to be considered during implementation

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	<p>and ferrous metal smelters) about the glass fragmenting and embedding itself into the other non-glass recyclable materials (which causes quality and productivity issues and potential processing downtime), it seems an opportune time during MMBC current review of the overall program, to have a serious discussion about having a hybrid system such that glass will be collected different than the other types of recyclables.</p> <p>My understanding is that the MMBC is recommending a hybrid system where some material are collected through blue box and others such as PS foam and film are collected through depots. I think this is a sound concept and an improvement. In most cases, the PS and film when collected in a blue box in a single stream environment, compacted in a truck with other material packages, the market value for this material after being sorted was poor at best and non-existent in most cases. In most cases, the materials were highly contaminated thus leading us down the less desired path of energy recovery. By putting through a depot collection system MMBC will increase the quality and increase the chance of it being recycled and thus increase the chance that the materials will be recycled in accordance with the MMBC preferred hierarchy – with recycling being the main aim ahead of energy recovery.</p> <p>If we want the recycling hierarchy to prevail over energy recovery, then the system's entire life cycle has to be well designed from the packaging design, to collection to the end market, and not just one part of the process. If we are true to our value of conserving non-renewable resources and reducing our carbon footprint, then every link has to be done right.</p> <p>I very much support the hierarchy MMBC have proposed and the recommended changes in collection system that would help contribute to making this hierarchy system achievable.</p> <p>From the processors and the downstream point of view, glass is by its nature abrasive and hard on the sorting, processing and manufacturing equipment. And the fragments that inevitably arise due to the combination of glass with paper, plastics etc. in the collection process are the root cause of this problem. I recognize that in terms of transportation, if I am paid by the pound, then the glass component definitely increases the weight and my revenue (as would sand, rocks, stone and concrete). This is the only appealing factor to anyone in collection, if you can call it a benefit at all.</p> <p>Key Performance Measurements – it is clear that the three dimensional balance sheet – financial, social and environmental – is critical for the community who are contributing by paying for the services and by being fully engaged in the process. This again will ensure that the full life cycle is managed in a responsible manner. Over twenty years ago, recycling was about collection. But now, the community wants to know the full life of the</p>		

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	<p>material. MMBC’s concept of a user pay is a very good one. But as a user who is paying a fee, may want to see that the job are being done and being done right – in a social, financial and environmentally responsible manner. How you do the job is equally as important as doing it. To be specific, there have been documented cases where recyclables have ended up being treated by using child labour with no safety provided to workers. There have also been cases where material is illegally imported and smuggled and the net benefit goes to organized crime and smugglers. No one wants to see all of the effort being funnelled into a smuggling operation just because their cost is lower and they do not have to live up to the expected standards. I would like to see a KPI where the processors and downstream plants are approved. I believe in a free market concept but I do not believe in the exploitation of man by man and will not support human or environmental abuse under any circumstances.</p> <p>Although the industry is taking a leadership role, we have to remember that recycling is a social movement. Its birth and drive was in and through the community. I can remember as a boy scout in the streets of my town, and in my school, collecting paper and cardboard as part of what I understood being the civic responsibility. Recycling has been built up from this type of grassroots movement and is rooted in a strong belief in social and environmental standards. It is important that MMBC keeps this in mind and true to those values in designing the next phase of the program.</p>		
Private company	<p>Plan Consultation I appreciate the time taken by the MMBC consulting team to hear and listen to our thoughts and concerns. That said, I must reiterate my earlier comments about the rushed nature of the consultation. I feel strongly that the plan preparation and consultation process was far too short- much shorter than originally promised by MMBC- and that this has negatively affected all parties, and resulted in a hurried plan that is in many instances unclear and potentially problematic. If no official extension is to be granted, I believe it is critical that the promises of real, meaningful plan consultation beyond November 19th be lived up to by MMBC.</p> <p>Uncertainty After reading the draft plan, attending the info session on October 29th, and having follow-up conversations with MMBC's consultants, there are still many uncertainties pertaining to service providers such as Urban Impact. In particular, I have noticed significant discrepancies/omissions between what is laid out in the plan and the more detailed explanations that I have since received from MMBC consultants. At this point more follow-up is planned in order to clear up these confusions. Only following these discussions, when I have a full and clear understanding of how the program will work</p>	<p>Plan Consultation: MMBC will continue to dialogue with stakeholders during plan implementation. Qualification Standards: Thank you for your comment regarding delivery of services in compliance with qualification standards. Service Provider Selection Principles: Section 4.5 refers to a number of evaluation criteria to be considered by MMBC when selecting post-collection service providers. These include but are not limited to price. As you state, it is in MMBC's interests to ensure that there are multiple service providers able to compete to provide services. Influences of the Market Clearing Price: MMBC will define the collection service to be provided for the market-clearing price offered. Incentives for Collectors: Thank you for your suggestions. Contracts with Processors: The outcome of the RFP process will be agreements between MMBC and primary processors establishing a direct relationship for the agreed services. Collector- Processor- MMBC Relationships: A processor planning to bid on PPP from a given collector may establish mutually agreeable terms with the collector that would take effect if the</p>	No revision to PPP Stewardship Plan; to be considered during implementation

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	<p>and its implications for our business, will I be able to provide detailed and comprehensive input. In the meantime, with the deadline for initial submissions approaching, I thought I would lay out some more general comments and concerns that I have with the plan.</p> <p>Qualification Standards I would like to say that I am very pleased to see the inclusion of section 4.6, which outlines examples of qualification standards for collectors and processors. These standards will be critical to the success and legitimacy of the MMBC program. The existing lists of qualifications need to be expanded- with input from industry- and strictly and objectively enforced on all service providers regardless of their location or other circumstances. With such a large variety of different players potentially involved, standards will have to be strictly upheld in order to ensure a level playing field in the marketplace. This will also be necessary for MMBC to fulfill its obligations under the Recycling Regulation, and for the program to remain legitimate in the eyes of the BC public.</p> <p>Service Provider Selection Principles In addition to qualification standards, I believe there are several principles that also need to be considered when it comes to selecting from interested service providers. These principles need to be either incorporated directly into the plan, or at least considered as part of the philosophy of the plan.</p> <p>For many years I have spoken about industry best practices with respect to processing. One of the key themes I have always spoken to municipalities about is a fair evaluation of RFP or Tender submissions. If a municipality receives three to four bids for work to be completed (whether it be collection or processing), it is imperative that they look past the low bid submission. In our experience the low bid often comes with poor service, administrative burdens for the cities and poor public opinion with respect to the work. I could site several examples of where this has been the case.</p> <p>The driving force behind this trend has been the municipalities' inability to look past the low bid because their ever diminishing budgets require them to minimize costs at all levels of service delivery. This is an extremely frustrating process for a legitimate bidder to have to contend with. In addition to taking a low bid, there have also been situations where municipalities have renegotiated contracts with the low bid service provider after the RFP process is complete and decided upon. In my view, both of these issues are extremely important for MMBC to consider prior to endorsing a plan. Failing to do so may result in the disappearance of necessary and capable competition in a variety of market sectors. As a monopoly purchaser of services, it is in MMBC's interests to ensure that</p>	<p>processor wins the MMBC bid. Arrangements could include, but are not limited to: service assurance; material quality; consolidation, transfer, freight arrangements; payments for services outside of MMBC's scope of service such as management of ICI PPP; premiums for specific material quality achieved; and, dispute resolution mechanisms separate from MMBC's dispute resolution process.</p>	

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	<p>there are several legitimate and satisfactory service providers in a variety of different geographic areas throughout BC.</p> <p>Influences of the Market Clearing Price</p> <p>I would also like to raise the issue of the "Market Clearing Price" (MCP) and its potential influence on collection methods. It is clear that the MCP will heavily influence how material arrives at our facilities; as a processor with large amounts of cap ital invested in infrastructure, this issue is paramount. If MCPs are put out to collectors without specific direction on how material is to be collected, it is inevitable that collection will move towards single stream because this method is cheaper and will allow the highest return on the collection incentive for municipalities. This will be a problem where infrastructure capable of processing single stream material does not exist. This infrastructure can be developed, but this will take time and require large guaranteed tonnages to justify. MMBC needs to be very clear from the start about how they will incorporate collection method stipulations into the MCPs so as to not end up collecting material in a form that cannot be dealt with.</p> <p>The MCP also has the potential to effect contamination in materials delivered to processing facilities. As stated above, an open MCP will encourage the use of single-stream collection systems, which consistently have higher contamination rates: according to our audits usually 5-10 percentage points higher than multi-stream systems. Strict quality standards must be set, monitored and enforced so that processors are not forced to pay the cost of dealing with this excess contamination. In addition, the cost of dealing with the garbage and non-recyclable materials that will inevitably end up in the mixture must be acknowledged by MMBC and worked into payments to processors.</p> <p>Incentives for Collectors</p> <p>Following Phase 1 it appeared as though MMBC was looking towards contracts with collectors, but has since moved to supporting incentives for collectors via MCPs (Section 4.4). It is important to acknowledge that collectors (like processors) have high fixed capital costs and must service all households in the designated area whether there is recycling set out at the curb or not. In this context it makes much more sense to pay incentives based on households served, rather than tonnes collected.</p> <p>Such a system would also eliminate any perverse incentives to collect non-compliant materials (contamination) in order to increase tonnages (and incentives) collected. Additional collection incentives over and above households serviced would also be a viable option (i .e. bonuses for exceptionally clean material, accomplishing more calls per day then planned, receiving few complaints etc.).</p> <p>Contracts with Processors</p>		

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	<p>After Phase 1, MMBC also endorsed engaging processors via incentives, but has since shifted to a contract with processors model (Section 4.5). I believe that this is a step in the right direction, however what is described in the plan is still problematic. In the plan, the contracts between MMBC and processors seem to simply qualify them to accept material, rather than establishing a direct relationship with MMBC for a set amount of tonnes delivered to the plants, in a form that is consistent and can be prepared for with appropriate capital investment. From a processor's perspective, an agreement that does not include these components is not a contract, it is merely an opportunity to see if volume can be directed to a facility.</p> <p>Collector- Processor- MMBC Relationships</p> <p>Finally, the relationships between processors and collectors, and processors and MMBC are not adequately explained in the plan. For example, in section 4.5 the plan says, "Arrangements between qualified collectors and processors will be left to the discretion of the parties through arrangements made in the free-market." It is unclear as to what exactly this means, i.e. what types of arrangements will be made between processors and collectors, in addition to those made between processors and MMBC? As processing is a capital intensive, fixed cost business, the bottom line is securing guaranteed tonnages over set (and preferably long) periods of time. At this point I am still uncertain as to how, if at all, processors are to go about doing this. I would caution MMBC that if these types of guarantees cannot be made, the costs involved on the processing side will increase dramatically.</p> <p>As mentioned, I look forward to more conversations with the MMBC team in the coming weeks when my concerns and uncertainties can be addressed. I very much hope that stakeholder input will be duly considered and incorporated into the plan wherever possible, and that this process will not come to an end on November 19th.</p>		
Private company	<p>Comment 1: In the Introduction section, an estimated current recycling rate of 50% for packaging and printed paper (PPP) is indicated. We assume that MMBC is referencing the rate from its own document, The Current System for Managing Residential Packaging and Printed Paper in British Columbia, and should cite this. We also suggest that the calculated recycling rate range of 50% to 57%, as presented in the MMBC publication, should be utilized instead and referenced.</p> <p>Comment 2: In section 4.4, the plan states that MMBC will pay collectors once the PPP they have collected has been accepted for processing by a primary processor under contract with MMBC. As it is now written, the processor will determine a collector's acceptable material leaving the processor as the sole decision-maker, signaling a potential risk for a collector. A collector's payment should be completely separated and</p>	<p>Comment 1: Changed to 'estimated 50% to 57%' and a footnote has been added citing the source document.</p> <p>Comment 2: Collectors will be paid through the market-clearing price incentive for collection services, separate from processing services. The collection service includes collecting materials in a condition that is acceptable to MMBC's contracted processors. Confirmation of receipt by MMBC's contracted processor is one of the mechanisms to confirm that the collector has delivered the service.</p> <p>Comment 3: MMBC will enter into an agreement with each collector, whether local government or private sector. MMBC expects that many local governments that accept MMBC's market-clearing price will</p>	Section 1 revised to 'estimated 50% to 57%' with a footnote citing source document.

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	<p>bifurcated from the processor, as collection costs are distinct from processing. Collectors must be assured that they will indeed be reimbursed for delivery of PPP materials as a benefit of their significant collection investment. Collection costs are generally fixed and are dependent on the household count. Collectors should not have their basic payment covering collection costs dependent on processors. We believe that separate and reliable payments are fundamental to ensure consistent and high quality collection. Furthermore, the division of payments allows for each industry component to focus on their areas of expertise.</p> <p>Comment 3: According to Footnote 13 in Section 4.4, the market-clearing price will be subject to executing an agreement to provide a defined service. This statement suggests that, although financial incentives will be used to primarily pay a collector, an executed contract will exist between a collector and MMBC (that is, if a municipality declines to accept and perform under the market-clearing price). WM supports the use of contracts whether the contractual arrangement is either with municipalities or MMBC. A long-term executed agreement is necessary to obtain infrastructure and equipment funding, and will ultimately define service quality, driving both competition and innovation. Using contracts to guarantee specific performance, MMBC could ensure quality collection services are retained and that PPP recovery goals are achieved.</p> <p>Comment 4: Multi-family collection is currently handled in a variety of ways across the province. In many cases, multi-collection is combined with commercial customer collection and allocations are applied to the material collected. In those instances where multi-family collection services are provided in an open-market service, the value of the commodity collected plays a critical role in the pricing and services provided to customers. In Section 4.4, MMBC indicates it will engage qualified collectors to service residents where set-out of PPP is at curbside and to service multi-family dwellings where set-out of PPP is on private property. Could MMBC please clarify the methodology anticipated for multi-family payment in this PPP stewardship system?</p> <p>Comment 5: In Section 4.4, for both single family and multi-family PPP curbside collection, where a private collector accepts the market-clearing price, the plan states that MMBC will provide management of collection service customers through its own means. In their plan presentation, consultants have been explicit that MMBC will maintain its own customer service delivery system. However, clarification is needed as to whether MMBC will incorporate customer service costs in the market-clearing price it offers to municipalities and collection companies. Although MMBC may provide customer service themselves, collection companies support customer call centers which are typically the first point of contact for a customer. Call centers are an enormous part</p>	<p>continue to contract out their collection services.</p> <p>Comment 4: Section 4.4 states: The market-clearing price can be set at a flat rate per tonne accepted for processing by a primary processor or at a flat rate per household serviced, or some combination. Where the multi-family building PPP is collected on the same routes as commercial PPP, factors will be applied to represent the residential PPP to ensure that MMBC is paying only for the residential PPP collection service.</p> <p>Comment 5: Where a local government declines the market-clearing price for curbside collection, MMBC will tender for services. Where MMBC tenders for curbside collection services and where a private collector accepts the market-clearing price for multi-family or depot collection services, MMBC will manage these contractors, including dealing with collection service customers as required. The market-clearing price offered to local governments for curbside collection services will reflect service administration costs. Where curbside collection is out-sourced by local governments, the bid price presumably includes the collection company's costs to operate its customer call center.</p> <p>Comment 6: MMBC will utilize collector and processor qualification standards that will incorporate safety and environmental considerations.</p> <p>Comment 7: Thank you for your comment.</p> <p>Comment 8: GHG is highly dependent on the source of power at the recycling end-market location. While information to calculate GHG could be compiled, it would add cost to the PPP program. MMBC will consider ways to ensure the PPP program is responsive to stakeholders needs.</p>	

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	<p>of WM’s success in delivering high quality service to customers. Our drivers and customer service staff have daily contact with individual customers, and our customers will continue to demand safe and reliable collection services for PPP materials. Therefore, WM believes that the market-clearing price should include costs to continue to deliver excellent service to PPP customers.</p> <p>Comment 6: MMBC explains in Section 4.4 that the use of the market-clearing price is to encourage continued efficiency by those who can deliver the service at less than the market-clearing price while encouraging initiatives to reduce costs where costs exceed the market-clearing price. We hope that MMMC’s program delivery principles of driving innovation and seeking continuous improvement are not abandoned in order to push to a system of lowest cost delivery of PPP collection services. A PPP stewardship program should not be focused on driving to the lowest cost as the primary objective. Alternatively, our goal should be to provide a high performance PPP program to include both safety and environmental considerations. Insistence by MMBC on high performance will drive innovation, harmonization, and will reduce overall system costs in the long term.</p> <p>Comment 7: In Section 4.4, MMBC describes the establishment of the market-clearing price as an iterative process that will be monitored and adjusted to reflect changing conditions. The market-clearing price, if it is adjusted, needs to always remain competitive and allow service providers to remain profitable. If the price is not adequate, service and operator performance will become deficient and dive to a bottom level. The value of service quality must be recognized as part of the cost of providing service and must be accommodated in the market-clearing price structure and any modifications of that price.</p> <p>Comment 8: MMBC captured several quality reporting indicators in section 5.5 of the draft PPP stewardship plan. However, there are performance indicators which are missing from the plan and have been recommended by the Ministry of the Environment (Ministry) for inclusion in an approved stewardship plan. Although environmental impact measurements are discussed, greenhouse gas (GHG) emissions have been omitted. For example, the Ministry advises that GHG measured as a percentage change per unit collected in GHG emissions as compared to previous years be a performance indicator. Other missing key performance indicators are measurements of stakeholder engagement and both customer and stakeholder satisfaction levels (to include individual customers) regarding the operation of the PPP program. Please refer to Appendix B, Reporting on Program Performance, in the Ministry’s Recycling Regulation Guide for examples of additional suggested performance indicators.</p>		

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Producer	<p>Section 3.2 indicates that Printed Paper is defined as: Schedule 5 defines printed paper as "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". Then, in the Draft Table of Definitions of PPP Material Sub-Categories identified on the MMBC website link, "General Use Paper" has been added as a subcategory under Printed Paper, and products such as blank and ruled notepads have been included as an obligated material for which fees would be paid by Brand Owners/Producers. We have a number of comments and concerns regarding the above. Specifically:</p> <ul style="list-style-type: none"> • The definition in Schedule 5 above clearly indicates that Printed Paper is paper that is printed with text or graphics used as a medium for communicating information. We do not agree that blank notepads should be included in this definition. Blank and ruled notepads are not printed with text or graphics that convey information. There is no information on them at all. Blank or ruled notepad paper are sold to consumers as a product, for further use. • It appears the inclusion of products such as blank notepad paper as an obligated material under the Printed Paper category stated in Section 3.2 will create an unlevel playing field in the marketplace and would result in an unfair submission of fees amongst players. For example, it would require Brand Owners who sell products that are made from paper to pay a fee for these products, while other Brand Owners who sell products made from aluminum foil (empty pie plates, foil food wrap) or products made from plastic film (e.g., rolled film wrap), would be exempt. To give another example: Having blank notepad paper as an obligated material, and paper serviettes as an exempt material, again, creates an unlevel playing field. They are both paper products for future use, and it seems because the former is recyclable in most municipalities, while the latter is not, the former is included as an obligated material while the latter is not. (Reminder- Packaging, regardless if it can be recycled or not is obligated material). • We agree, that if paper is printed with text or graphics for communication purposes, it should be included as an obligated material. However, blank or ruled notepad paper that is sold as a product, should not be included. <p>Recommendations: For the above reasons, we feel that blank and ruled notepad paper should be removed from the list of obligated materials under the Printed Paper Category.</p>	<p>Section 3.2 sets out the definition of Printed Paper from the Recycling Regulation. The draft definitions of PPP material sub-categories are for purposes of producer reporting. These draft definitions are subject to discussion with producers during Quarter 1, 2013 before being incorporated into the producer reporting protocol.</p>	<p>No revision to PPP Stewardship Plan; to be considered during implementation</p>
Producer	<p>Many businesses in our industry and many others are very complicated as it relates to packaging materials. We are a small grower retailer.</p>	<p>In 2011, the BC Ministry of the Environment (MOE) included packaging and printed paper under Schedule 5 of the Recycling Regulation. By this action, producers became responsible for managing the packaging</p>	<p>No revision to PPP Stewardship Plan; to be considered during</p>

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	<p>What I have read so far scares me a lot. It looks like a program like this is going to be a bureaucratic nightmare and an enormous cost to small business.</p> <p>At present we have an excellent recycling program in the Maple Ridge Pitt Meadows area with a high percentage of packaging being diverted from the waste stream. There are also a lot of small communities with excellent recycling facilities, places like Logan Lake and even small communities like Lac Lejeune areas I happen to be familiar with. Even organics like kitchen waste are now collected in our area. I do see little need to burden small business with collecting recyclables for the following reasons:</p> <ol style="list-style-type: none"> 1. How do you avoid people not to bring back packaging from items not purchased from your store. We already noticed many years ago, when we used to take back used plastic pots and trays, that most of them came from other retailers. People will bring them to the most convenient place on their way to or from work. 2. A lot of our primary production packaged in branded boxes is exported to the United States. 3. Many people shop south of the border. Those retailers will not be burdened with this program and be at an even bigger economic advantage. 4. When products arrive in our store some are from Canadian wholesalers and some directly from the U.S. 5. Many small retailers don't have facilities (space) to collect waste. It is much more effective for people to send their cardboard boxes and Styrofoam packaging to a recycling facility or have it picked up in front of their house rather than people driving around to all the stores where they bought items to return the packaging. Unloading this kind of cost on small business will again make life more expensive for the BC population because these costs will have to be passed on. Also programs like these favor the big box retailer with the staff and space to deal with these things. 	<p>and printed paper they supply to BC residents when the residents are ready to dispose of it. Producers have until November 19, 2012 to file a plan with the BC MOE explaining how they will implement the required program in May 2014 to achieve a 75% recovery rate. While an individual producer could operate its own collection program (for example by collecting at its retail stores), a producer could choose to become a member of Multi-Material British Columbia (MMBC) who will, on behalf of the producers who are its members, enter into arrangements with local governments and private companies that are already operating residential recycling programs. This will involve paying the collectors and processors which shifts the costs for providing recycling programs for packaging and printed paper from local governments and their property taxpayers to producers.</p> <p>With respect to your specific questions:</p> <ol style="list-style-type: none"> 1. If you choose to accept your packaging at your retail store, you may receive packaging supplied by another producer. However, you can count this packaging towards your 75% recovery target. 2. The program applies only to packaging and printed paper program supplied to BC residents. If it leaves the province and is supplied to residents in other jurisdictions, it is not included in this program. 3. Programs that make the producer responsible for end-of-life management are not yet common in the US but are under consideration by many US governments, including those in the northwest. 4. If the Canadian wholesaler is based in BC, they may be the obligated producer. Where the Canadian wholesalers are in other provinces or in the US, you are considered the first importer of the packaging and are therefore considered to be the obligated producer in BC. 5. While an individual producer could operate its own collection program, a producer could choose to become a member of Multi-Material British Columbia (MMBC) who will, on behalf of the producers who are its members, enter into arrangements with local governments and private companies that are already operating residential recycling programs. This will involve paying the collectors and processors which shifts the costs for providing recycling programs for packaging and 	<p>implementation</p>

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		printed paper from local governments and their property taxpayers to producers. I encourage you to review the information for producers on the MMBC website (http://multimaterialbc.ca/producers) and consider executing the Letter of Intent (See the section titled What are the next steps for producers?) to become a member of MMBC prior to the November 19, 2012 deadline for submitting a plan to manage packaging and printed paper to the MOE.	
Producer	First of all, I would like to commend MMBC in doing a fine job in leading the overall PPP Stewardship Plan development. Such a task is very complicated especially when so many stakeholders are involved. I felt the development was very collaborative and the consultation process was very detailed and transparent to all involved. The biggest concern Amway Canada Corporation has is; The beginning point of material fees. Material fees need to be fair amongst the material groupings. Factors such as % generated and % recovered need to be significant factors in determining the material fees. Materials which have a low % recovery rate need to be penalized from higher % recovery rate materials and there also must be balance amongst the higher % generated materials. Material fees for printed paper in Manitoba, Ontario, and Quebec have been significantly the lowest amongst all material groupings even though this material comprises half or even greater the total % generated.	Under the Recycling Regulation, the obligation begins in May 2014. Section 4.10 of the Draft PPP Stewardship Plan sets out proposed principles for allocating program costs among producers.	No revision to PPP Stewardship Plan; to be considered during implementation
Producer	We at Behr Process Corporation suggest that the third bullet point in the list of items not considered packaging for purposes of the plan on page 3 of the draft plan, which currently reads: "Empty paint and stain containers and aerosol containers as defined by Schedule 2 of the Recycling Regulation;" be revised to read as follows: " Products included in the Paint product category as defined by Schedule 2 of the Recycling Regulation that are the subject of another recycling program in the province of British Columbia;"	As Schedule 2 applies to both containers returned with residual paint product and empty paint containers, the PPP Stewardship Plan will exempt these containers. For clarity, we will revise the language on page 3 from "Empty paint and stain containers and aerosol containers as defined by Schedule 2 of the Recycling Regulation" to "Empty architectural coatings, paints and stain containers as defined by Schedule 2 of the Recycling Regulation". We will also add a footnote to the word 'empty' which states: "Empty container means a container that holds less than 3% residual by volume, as defined in Schedule 2 of the Recycling Regulation".	Replace "Empty paint and stain containers and aerosol containers as defined by Schedule 2 of the Recycling Regulation" with "Empty architectural coatings, paints and stain containers as defined by Schedule 2 of the Recycling Regulation" and add a footnote to the word 'empty' which states: "Empty container means a

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			container that holds less than 3% residual by volume, as defined in Schedule 2 of the Recycling Regulation".
Producer	How much will this program cost? We need to sign a letter of intent but nowhere do I see the cost involved or how it is determined? Is it per sleeve? We use cellophane wrap on our roses and that looks like it applies to this program?	It is estimated that the current PPP system in BC costs between \$60M and \$100 M. To calculate the cost for each producer, a number of steps must be implemented: all producers that are members of MMBC will report the quantity of PPP they supply to BC residents, likely in Quarter 2 2013; and, MMBC must establish the market-clearing price for collectors, determine the cost for post-collection services and develop its administration and communications budget, likely by Quarter 3, 2013. The fees for producers will be calculated following these activities in Quarter 4, 2013. Fees are typically expressed as cents per kilogram of material. Cellophane wrap on cut flowers that remain on the flowers when purchased by a resident (i.e. not removed by the distributor or retailer) is considered packaging under the PPP Stewardship Plan.	No revision to PPP Stewardship Plan; to be considered during implementation

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Producer	<p>Keep it simple It is our view that stewardship plans should be made as simple as possible to encourage a broad public understanding and acceptance. Moreover, they should also allow for as much delivery flexibility as possible so that each change to the plan can be made with a minimal approval process.</p> <p>The MMBC program is industry run; industry should be permitted the flexibility to run a program that meets the spirit of the regulations and the government’s public policy objectives with as little prescription as possible. This allows for market-driven quality and competition. Is also encourages innovation.</p> <p>Cost of membership to MMBC is open ended As a global citizen, Dell is committed to minimizing the impact that our operation, and those of our supply chain, has on the planet and the communities we live and work in. We believe it’s possible to succeed in business without doing harm to the environment. Dell delivers on our commitments by ensuring that our costs are controlled and optimized on a regular basis. Dell does not support additional costs created by structures that do not directly serve waste diversion objectives.</p> <p>In its proposal, MMBC makes no commitments regarding the cost structures of the program. As a result MMBC participating stewards have no good measure of what to budget for, what to expect program costs to be and more important how these cost will impact our business and subsequently our customers. Considering this is the first of its kind program in the country making producers responsible for 100% of the cost of the program, MMBC should provide a solid business plan to deliver on its commitments to participating obligated producers. We are concerned that we have not seen that in a year since MMBC went on this discovery path, although we do appreciate the challenges MMBC is facing. Dell has agreed to participate in the MMBC plan on the condition that MMBC will deliver on this commitment and consult with its members prior to finalizing its costs.</p> <p>In addition to that, MMBC is accountable to all producers to ensure the structure is simple and does not contain excessive administrative burdens that will increase the cost exponentially. Dell supports simple structures that meet regulatory obligations and make it easy for producers to participate in as well as making it easy to deliver.</p> <p>Governance Structure and Board of Directors Packaging is a common design element for many industries from food, to clothing, to electronics and many others. While we appreciate the food packaging represents a large portion of the MMBC program, we are concerned that no other industry producers are represented on MMBC’s Board of Directors. We ask that MMBC reviews this closely and</p>	<p>Regarding 'keep it simple', thank you for your comments. Regarding 'cost of membership', it is estimated that the current PPP system in BC costs between \$60M and \$100 M. To calculate the cost for each producer, a number of steps must be implemented: all producers that are members of MMBC will report the quantity of PPP they supply to BC residents, likely in Quarter 2 2013; and, MMBC must establish the market-clearing price for collectors, determine the cost for post-collection services and develop its administration and communications budget, likely by Quarter 3, 2013. The fees for producers will be calculated following these activities in Quarter 4, 2013. MMBC is collaborating with PPP programs in other provinces to harmonize steward-facing services and minimize administration systems.</p> <p>Regarding 'governance structure', producers will be consulted on governance. Both companies and trade associations will have an opportunity to provide input. Competence-based governance frameworks will be used as a benchmark against which to design stewardship program governance. Regarding 'focus on recycling', MMBC is proposing to audit organics streams to identify the quantity of PPP being collected and assess the capability of composting facilities to accept compostable PPP. Costs to compost PPP would be attributable to the producers of compostable PPP. MMBC will implement internal controls and procurement and expense policies that will be monitored by a Finance & Audit Committee of the Board.</p>	<p>No revision to PPP Stewardship Plan; to be considered during implementation</p>

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	<p>accommodates other producers in their structure. Focus is on recyclable materials only In reviewing MMBC consultation materials we have not arrived to a conclusion on how MMBC will treat the following:</p> <ul style="list-style-type: none"> • How will advanced materials such as mushroom pulp/packaging, which are compostable and not recyclable be treated? • How is MMBC planning on controlling costs throughout the life of this program? • What are some of the key metrics that MMBC is going to use to address the responsible management of producer funds in administering this program? • Bamboo is mentioned in your document – we would like to remove from a fee schedule in the event the material is fully compostable. <p>As a result, we recommend that these complex materials require additional consultation via a technical committee that includes stakeholders from industry, recyclers and other interested parties, in order to properly address advanced packaging materials that should stay out of the recycling streams.</p> <p>In addition we recommend that MMBC investigates further the notion of tying this program to clear objectives for Design for Environment where producers that are focused on this subject would be recognized by MMBC.</p>		

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Producer	<p>Thank you for your ongoing hard work and educational initiatives related to the MMBC’s draft Stewardship Plan for Packaging and Printed Paper.</p> <p>Having attended the recent webinar and reviewed the attendant materials, we will soon submit our questions and comments once we have completed our consultation with the magazine industry. However, we have one particularly important question that we wish to pose in advance.</p> <p>Stemming from the meeting and its documents, it appears to us that there is continuing confusion over the definition of "producer" and the capacity of the regulation to actually capture "free riding" in any significant way, particularly among foreign producers. Having recently contacted Minister Lake on this subject, and having received assurances directly from him that BC government lawyers have reviewed the definition and appear satisfied as per his letter, we believe that the interpretations contained in MMBC’s draft plan materials and the verbal descriptions given during the webcast are not consistent with the regulation. We are very concerned that, in practice, the recently reinterpreted definition will be subject to broad misinterpretation which will allow foreign publishers and Canada Post to avoid compliance. The magazine media in BC could be targeted for all costs.</p> <p>It appears at this stage in the process that there is as yet no focus on the importance of getting this definition right. The magnitude of impact on BC magazines is enormous if MMBC gets this wrong. We must remind you that print media is not packaging. The battles being waged in Quebec and Ontario over legislation that is damaging print media should not be ignored in BC. Harmonization with these other jurisdictions, a phrase used repeatedly in MMBC’s consultations, may just push the magazine sector over the edge. A great many of our members have signed letters of intent on the understanding that necessary legislation and a clear and consistent interpretation of this legislation is in place to ensure magazines will be treated fairly within the MMBC system and that the viability of periodical publishing in BC will not be threatened by it. In this regard the free riding issue is just one concern.</p> <p>We ask MMBC to please address this major concern as soon as possible. We look forward to your response.</p>	<p>The proposed BC definition captures distributors and we have had two retail distributors of magazines LMPI (focused mostly on foreign titles) and Disticor Direct Retail Services register as producers with MMBC already. You are however correct in assuming that Canada Post will not register as a producer. They are not subject to provincial jurisdiction in this regard no matter how tight we make the definition. The definition as it currently stands will not capture foreign titles entering Canada by subscription mail. If you have names of other distributors that operate in the province that you could provide to us, we will follow up with them directly to ensure they are aware of the regulation, the definitions of producer and that they have an opportunity to comply.</p>	<p>No revision to PPP Stewardship Plan; to be considered during implementation</p>
Producer	<p>1. Unique to all products included within MMBC’s proposed plan, the magazine industry, as is the newspaper industry, is covered by the Canadian Charter of Rights and Freedoms. Our product enhances the lives of Canadians, provides knowledge and insight and can influence the social fabric of BC’s and Canada’s society. The inappropriate creation and management of MMBC methodologies could well silence and shutter many of these editorial voices which is a direct affront to democracy and our way</p>	<p>1. Printed paper is defined in the Recycling Regulation to include magazines. 2. MMBC would appreciate a copy of Minister Lake’s correspondence to understand how the MOE’s legal interpretation of the definition of producer differs from MMBC’s proposed definition. 3. MMBC continues to reach out to any potentially obligated PPP</p>	<p>No revision to PPP Stewardship Plan; to be considered during implementation</p>

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	<p>of life. We are of the opinion that magazines should be exempt from the MMBC program. Damage to these important and influential cultural products could open the door to a constitutional challenge.</p> <p>2. We are very concerned that there remains confusion over the definition of "producer" and the capacity of the regulation to fully capture "free riding" in any significant way, particularly among foreign producers. Having recently contacted Minister Lake on this subject, and having received assurances directly from him that BC government lawyers have reviewed the definition and appear satisfied as per his letter of August 29, 2012, we believe that the interpretations contained in MMBC's draft plan materials and the verbal descriptions given during the October 29, 2012 webcast are not consistent with the regulation. We are concerned that, in practice, the recently reinterpreted definition will be subject to broad misinterpretation which will allow foreign publishers and Canada Post to avoid compliance. The magazine media in BC could be targeted for all costs including volume not attributed to BC or Canadian producers. We request a clear and consistent interpretation of the legislation to ensure magazines will be treated fairly within the MMBC system and that the viability of Canadian periodical publishing in BC will not be threatened by it. Further, if it is found that the existing legislation will not capture foreign free rider volume, we strongly support suitable amendments to that legislation.</p> <p>3. We are doing our best to make BC and Canadian-based magazines aware of the need to register with MMBC promptly and we know that many have. What efforts will MMBC make in bringing foreign publishers into the program as paying producers? In the event that there are magazine free riders resulting in a significant proportion of unclaimed volume, how does that volume affect formulas and fees and who pays those bills? No registered magazine Producer operating in good faith with MMBC should be required to pay bills for those in non-compliance as it is unfair for them to carry an extra burden for which they have no responsibility or control. Therefore, MMBC and the Province of British Columbia must carefully consider who should pay to recycle materials from producers who have not been captured by the system. The bottom line is that British Columbia and MMBC have the ability, the authority and the moral responsibility to construct a system that does capture free riders with bullet proof legislation and execution. We should not be required to pay for shortcomings in this regard, particularly when it means that we underwrite global publishing giants like Hearst, Time Inc., Condé Nast and others. Why is this a material issue? Vogue's September issue was 916 pages; four of the top five and eight of the top ten largest newsstand magazines in BC are US-based. This is why a voluntary program is not a solution and we believe it to be naïve in the extreme to assume that foreign Producers will embrace a voluntary program. We</p>	<p>producer. We would appreciate your assistance in identifying any foreign publishers that we may not have identified. Any producer, including a producer of magazines, that chooses not to be an MMBC is responsible for submitting a plan to the MOE.</p> <p>4. Governments that distribute printed paper to residents are considered producers.</p> <p>5. MMBC's research into collection costs will include consideration of single and multi-stream collection systems. The draft PPP Stewardship Plan notes the importance of material quality, output from processing facilities and commodity values received.</p> <p>6. The quantity of magazines available for collection will be assessed as part of the waste composition audits. If magazines are kept by residents, fewer will be included in collection systems and collection and processing costs will be allocated to magazines accordingly.</p> <p>7. The Recycling Regulation does not establish a de minimis for small businesses. All PPP producers are obligated, notwithstanding the quantity of PPP they supply to residents. It is anticipated that MMBC will consider the appropriate balance of administrative burden when establishing the reporting requirements and fee obligations for producers.</p> <p>8. MMBC agrees that setting market-clearing price is critical to delivering an efficient and cost-effective PPP program. MMBC will be undertaking research into collection costs. If producers have access to costs for collecting PPP from residents, MMBC would appreciate this information.</p> <p>9. Thank you.</p> <p>10. The draft definitions of PPP are the proposed categories for purposes of producer reporting. MMBC will be reviewing these draft definitions and reporting protocol with producers prior to the first reporting obligation.</p> <p>11. Collectors and processors of magazines will require payment for their services. Within this context, MMBC will consider your request.</p> <p>12. MMBC will seek to ensure that all producers' interests are taken into consideration when developing, implementing and operating programs for printed paper and packaging. It is understood that different sectors may have unique issues relating to material capture</p>	

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	<p>commit to working with MMBC to provide industry-wide estimates of the volumes of all magazines, including U.S. titles imported into BC, so that there is a more informed quantification of compliance impacts.</p> <p>4. Many BC-based, government operated tourism bureaus publish large quantities of magazine-like guides. Does MMBC have the authority to ensure these Producers are registered and paying participants? If not, who pays for these products and other provincial/federal paper outputs? Provincial and Federal Producers should not be permitted to join the ranks of free riders.</p> <p>5. We request that MMBC carefully study support of a dual-stream collection system over single-stream. Data from various jurisdictions, including international experiences, suggests that dual-stream collection reduces contamination of porous materials such as magazine papers, reduces processing costs and results in higher quality fibres that may be sold for a higher dollar return. If single-stream collection is permitted, the quality and value of magazine papers may be significantly reduced harming magazine Producers via increased fees. If it is shown that single-stream collection does degrade magazine paper value, will MMBC compensate magazine Producers for any increase in cost and/or reduction in product value?</p> <p>6. Magazines are different. They are wanted products that are often passed from reader to reader over time and are saved, often for years. Many of BC’s magazines are arts, culture, literary, hobby & “niche” magazines with a high “kept” rate. They are not instantly discarded like most packaging, if at all. How can these well-known idiosyncrasies be addressed in formula and fee setting methodologies to ensure magazines receive a fair deal?</p> <p>7. The BC magazine industry is a collection of small independent to medium size businesses. Unlike Ontario or Quebec which house the majority of large circulation magazines in Canada, BC magazines are primarily free distribution, small circulation, low margin publishers. MMBC should implement a flat fee arrangement for very small producers, as is available in Quebec, and/or perhaps an exemption for not-for-profit magazine entities that also includes a simplified registration and data submission process. We are prepared to explore these options with MMBC.</p> <p>8. Under the proposed plan, we believe that getting the market-clearing price right, at the very beginning of the process, is vitally important to the longer term efficiencies that MMBC is able to offer its Producers. Our view is that the proposed plan does not go far enough in stressing the importance of market efficiency and lower costs. What input will Producers have in developing the data necessary to inform creation of a low cost, efficient market-clearing price?</p>	<p>and recycling and it will be important for MMBC to understand these matters in order to operate an effective and cost efficient plan. Consultations will be a regular feature of how MMBC does business and the program will operate on the principles of accountability and transparency.</p> <p>13. MMBC will be consulting with governance experts to ensure that program is overseen by directors who are well versed in necessary core competencies and their fiduciary responsibilities.</p> <p>14. Steward services will be harmonized based on the best practices identified in the collaborating jurisdictions.</p> <p>15. Program delivery activities, including R&D, will be leveraged among collaborating jurisdictions where possible.</p> <p>16. Data compiled during composition audits will be utilized to support accurate allocation of costs.</p> <p>17. The Recycling Regulation defines producers’ responsibilities.</p> <p>18. If magazines are used within institutional, commercial or industrial operations and are not supplied to residents, these magazines are considered ICI PPP and are not included in the residential PPP program. The PPP Stewardship Plan proposes to provide collection services only to residents, not to ICI generators. Magazine producers would be required to report to MMBC only the quantity of magazines supplied to residents.</p> <p>19. A cost allocation methodology for the BC PPP Stewardship Plan has not been developed at this time.</p> <p>20. A cost allocation methodology for the BC PPP Stewardship Plan has not been developed at this time.</p> <p>21. The Recycling Regulation requires that the PPP Stewardship Plan address the life-cycle management of PPP and the pollution prevention hierarchy. Sections 5.3 and 5.4 address these requirements, respectively.</p> <p>22. By collecting PPP that is recyclable and deferring collecting PPP that is not currently recyclable, we avoid cross-contaminating recyclable PPP with non-recyclable PPP and protect the quality of PPP that is recyclable and their commodity revenue.</p> <p>23. Bound reference books, bound literary book and bound text books are excluded by the Recycling Regulation definition. Bound magazines</p>	

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	<p>9. We support MMBC’s need for solid, up-to-date and local data to better inform and support an appropriate go-forward business model.</p> <p>10. Does MMBC foresee bundling or aggregating various classes of papers together? Given the relative ease of processing magazines, we strongly believe that magazine Producers should not be saddled with costs attributable to harder-to-process materials whether they are other paper types or other material types, particularly complex plastics. In addition, it should be abundantly clear as to what magazine Producers are paying for, i.e. common costs; administration; etc</p> <p>11. Given MMBC’s mandate to educate BC residents, promote the efficient and frequent use of the Blue Box program and to reach the ambitious goal of 75% recovery, magazines can play a major role in creating much needed awareness and positive actions. We propose that magazines qualifying as Producers within MMBC’s proposed plan provide in-kind advertising support to MMBC objectives in lieu of paying any fees into the MMBC system. To assist, we propose creation of a magazine advisory to work with MMBC in order to help promote achievement of MMBC’s objectives via communication programs. We are happy to work with MMBC in this regard. If paid media is part of the plan, magazines want to be at the table.</p> <p>12. We note that Board composition for PPP is entirely made up of representatives from the Packaging industry. Magazine industry representation is required given the vast differences that exist between magazines and packaging products and given the vast amount of time, interest and knowledge we can add as an asset to MMBC as it embarks on this ambitious program. We will provide you with recommendations.</p> <p>13. Has MMBC considered including independent, arms-length representation from within the product collection/processing community to either join or advise MMBC’s Board of Directors? If the right person is chosen, they have considerable expertise.</p> <p>14. We are concerned about the idea of “harmonized compliance” as it relates to other provincial jurisdictions. Given battles being waged in Quebec and Ontario over legislation that is damaging print media, we believe that MMBC has the opportunity to avoid making similar mistakes. We are not convinced that a one-size-fits-all approach to fee structures and collection strategies is the correct strategy going forward. That said, we are in favour of harmonizing back-end administrative processes and Producer interfaces, where practical, to reduce duplication, complexity and confusion.</p> <p>15. We are not in favour of supporting R&D in individual regions that is, or has potential to be, duplicated in other provincial jurisdictions. Further, we are not in favour of supporting/funding R&D projects that do not relate to magazine papers. We suggest that future R&D projects may primarily involve complex, difficult to process products such as</p>	<p>are not excluded.</p> <p>24. Agreements between MMBC and each producer will include a dispute resolution procedure.</p> <p>25. Section 4.11 refers to equitable sharing of costs of administration and resident awareness cost. This section also sets out principles for allocation of program delivery costs among producers. A cost allocation methodology for the BC PPP Stewardship Plan has not been developed at this time. Under the Recycling Regulation, any producer, including a producer of magazines, that chooses not to be an MMBC is responsible for submitting a plan to the MOE.</p> <p>26. A cost allocation methodology for the BC PPP Stewardship Plan has not been developed at this time.</p>	

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	<p>plastics and laminates, research that should be directly attributed to those products.</p> <p>16. As and when paper bundles are audited, will audit findings affect formula or fee setting directions?</p> <p>17. MMBC’s proposed plan does not adequately define the scope of Extended Producer Responsibility. Where does EPR begin and end for Producers? We believe that a definition of the term will assist MMBC with priorities, legislators and regulators, stewards as well as the public.</p> <p>18. Please clarify how MMBC defines B2B transactions as they relate to magazines sold or distributed to commercial (non-residential) addresses. Will this volume and cost be excluded from MMBC’s plan? And if so, how will this be accurately and fairly assessed?</p> <p>19. Has MMBC considered offering fee discounts to Canadian magazine products printed on environmentally friendly papers containing post-consumer fibre as is offered in Quebec? We suggest that any such offering would encourage usage of eco papers and serve the broader agenda of the MOE.</p> <p>20. Has MMBC considered rewards or incentives for Producers delivering high recovery rates, as offered in other provincial jurisdictions?</p> <p>21. During the recent consultation, there was much discussion regarding environmental and social factors. In what way is MMBC mandated and equipped to track and deal with these factors?</p> <p>22. In Section 5 (page 16) of the proposed plan, we are unsure of the meaning of: “It upholds the pollution prevention hierarchy by ensuring the PPP program focuses on recycling outcomes and does not rely on the recovery and disposal options on the pollution prevention hierarchy.”</p> <p>23. Are bound literary magazines exempt from MMBC’s program?</p> <p>24. How does MMBC propose resolution of disputes with its Producers:</p> <p>25. We would like to see “fairness” as an articulated guiding principle of the system to ensure a level playing field for all.</p> <p>26. We have learned a lot in the jurisdictions where magazine publishers are already stewards. To address issues of fairness that have unduly penalized magazines, other jurisdictions are having to undo or reverse certain practices in the magazine category.</p> <p>a. First, it appears to be universally accepted that paper is the low hanging fruit in the blue box world. It has high recycling rates, is easily collected and processed and eventually sold on commodity markets. Magazines should see these realities reflected in the rates.</p> <p>b. Producers should pay for the costs of their own materials.</p> <p>c. Magazines should be categorized with like materials. We object to being lumped in</p>		

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	<p>with mixed paper, for example.</p> <p>d. When more and more complex materials – all of which are packaging – are added, magazine fees go up. This is because the entire system has gotten more expensive because of a very few materials. We have been working very hard to reverse this elsewhere and hope that British Columbia will not make the same mistakes. If a complicated material is added, the costs should be entirely borne by that material. This logic should extend to expenses relating to share of overhead, advertising, etc.</p> <p>27. The BC and Canadian magazine industries remain committed to the efficient recycling of its products. However, we have many concerns relating to the fair and equitable treatment of magazine Producers within the proposed plan. It is a good start but much work needs to be done particularly as it relates to free riders, cost allocation, formula and fee methodologies, governance and recognition that print magazines are unique within the broader spectrum of materials to be handled by MMBC. Magazine Producers require fair and equitable treatment so as not to create irreparable damage within an already challenging media environment. We will work with MMBC and other Producers in search of ways to create a series of best practices and policies to support a highly functional and efficient program that will become the model for and envy of other provincial jurisdictions.</p>		
Producer	<p>I have a question about volume of paper and packaging that would qualify for this program. We currently only ship into BC about sixty pieces per month of product that is no larger than a toaster. Will we be required to sign-up for this program? Or could this be handled by our Nintendo of Canada branch that would have significantly more volume.</p>	<p>Nintendo Canada can be appointed as the voluntary producer for your volumes. Alternatively, MMBC may establish an administrative de minimis to minimize your reporting and payment obligation for volumes below a certain threshold.</p>	<p>No revision to PPP Stewardship Plan</p>
Producer	<p>Board members appear to be primarily comprised of food related representation. Agreed that food related products comprise a majority of the PPP collected for processing, but consumers also dispose of packaging materials related to these purchases and you will be looking to stewards in these product areas to appoint MMBC as their agent. Will you have operational committees or other groups involved in the ongoing activities that will represent consumer electronics or IT product manufacturers? During your consultation processes to date, were any electronics manufacturers (whether consumer electronics or IT products) involved in the discussions?</p> <p>a. If not, will there be consultations involving these groups before the end of the consultation period?</p> <p>i. If yes, when and which organizations will be notified of the consultation?</p>	<p>MMBC will seek to ensure that all producers' interests are taken into consideration when developing, implementing and operating programs for printed paper and packaging. It is understood that different sectors may have unique issues relating to material capture and recycling and it will be important for MMBC to understand these matters in order to operate an effective and cost efficient plan. Consultations will be a regular feature of how MMBC does business and the program will operate on the principles of accountability and transparency. Electronics manufacturers participated in the workshop held on February 14, 2012 and the workshop held on October 29, 2012. MMBC will host a webinar for producers during plan implementation.</p>	<p>No revision to PPP Stewardship Plan; to be considered during implementation</p>

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	<p>ii. Will there be a conference option at these consultations for those not based in BC? The plan defines obligated packaging as the packaging items that are on the product when it is delivered to / purchased by the consumer. What about packaging that is removed and processed by retailers (i.e. related to delivery of major appliances or when large TV's are delivered and installed by the retailer)? As this packaging does not make it into the residential stream, the program should explicitly exclude such items from obligation, or you will be double counting.</p> <p>On page 6, the plan references economic incentives. Please clarify what this means. Is it referring to incentives offered to consumers, to local governments, or to processors? If to processors, please note the issue related to processor incentives noted in Ontario and the negative results from that program. You could end up “importing” packaging for processing from the US and neighbouring provinces to the detriment of the program.</p> <p>On page 7, there is a similar reference to “incentives to qualified collectors”. See comment in question #4 related to “economic incentives”.</p> <p>Regarding the “processor qualification standard”:</p> <p>a. Who will be consulted regarding the development of the standard?</p> <p>b. Are there any internationally accepted standards which can be leveraged? If not, on what basis will you develop this standard?</p> <p>c. Do the current processors have any certifications?</p> <p>On page 15, there is reference to an allocation for R&D to those stewards who introduce non-recyclable products into the stream. Related questions:</p> <p>a. Who will make the determination that the packaging material is not recyclable?</p> <p>b. Is the “other films” category shown in the Draft List of PPP document an example of a deemed “non-recyclable” packaging material?</p> <p>i. If yes, what is the composition of the films in this category and who made this determination?</p> <p>c. Who determines if the R&D activities are feasible?</p> <p>d. Who will track the R&D activities to determine if the funds spent are being efficiently used and are appropriate for the non-recyclable products?</p> <p>e. What reporting will be given to stewards to document this progress? Transparency is a significant concern.</p> <p>f. Will any consideration be given for manufacturers conducting their own R&D activities?</p> <p>Overall, the concern is that MMBC is asking the manufacturers for a blank cheque to engage in R&D activities that may not be relevant or result in anything usable for manufacturers. Realistically, much of the packaging is made by other organizations and they will not provide formulations for their packaging. As such, recycling methods for</p>	<p>Section 3.3 references 'packaging that goes to the household'. If packaging does not go to the household, it is not considered residential packaging which must be managed by the resident and by MMBC.</p> <p>The PPP Stewardship Plan includes a number of types of economic incentives including the market-clearing price financial incentives offered to collectors, payments to primary processors based on outputs to recycling end-markets and revenue sharing arrangements with primary processors. The market-clearing prices offered to collectors are unlikely to attract cross-border material due to the relatively low incentive value (in comparison to the processor incentive for WEEE in Ontario).</p> <p>The PPP Stewardship Plan includes a number of types of economic incentives including the market-clearing price financial incentives offered to collectors, payments to primary processors based on outputs to recycling end-markets and revenue sharing arrangements with primary processors. The market-clearing prices offered to collectors are unlikely to attract cross-border material due to the relatively low incentive value (in comparison to the processor incentive for WEEE in Ontario).</p> <p>MMBC will develop the processor qualification standards with an opportunity for review by PPP processors. Local governments that currently contract for PPP processing include processor qualification requirements. MMBC will review available documents to identify best practices to be incorporated in the processor qualification standards.</p> <p>a) Where recycling end-markets exist with sufficient demand to accommodate PPP collected in BC, the PPP will be considered recyclable. Where no recycling end-markets exist or where the demand is insufficient to accommodate PP collected in BC, the PPP is not considered recyclable. b) Yes. Please refer to footnote # 5 in the document titled Draft List of PPP to be Collected under PPP Stewardship Program (posted on the MMBC website) for examples of this type of film. MMBC is the agency responsible for implementing the plan and achieving the 75% recovery target and will determine the necessary steps to achieve this regulatory obligation. MMBC will identify and establish a budget for R&D activities during implementation. MMBC will dialogue with its members on an on-going</p>	

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	<p>one product line may not be viable for others. In such a case, R&D activities for one product area may end up being inappropriately subsidized by other stewards even though the results won't have any benefit to them.</p> <p>On page 15, there is a comment regarding no visible chargeback to consumers at the cash register.</p> <p>a. Isn't this recommendation contrary to the transparency principle inherent in the other programs within the Recycling Regulation?</p> <p>b. The advantage of visible fees has been to give consumers "skin in the game" and encourage them to actively recycle. Without such an obvious incentive, consumer behaviour may not change and consumers may continue to send packaging products to the landfill.</p> <p>On page 15, there is reference to the term "equitable" in the allocation of costs.</p> <p>a. What is the basis for equitable? Total packaging supplied to BC consumers (i.e. packaging composition * sales volume)?</p> <p>b. Will this allocation method also be used for the R&D costs mentioned?</p> <p>c. How will this allocation take into account the "non-recyclable" packaging?</p> <p>On page 20, there is a statement related to encouraging companies to develop new packaging technologies (i.e. bagasse, bamboo, and recycled resins).</p> <p>a. Unless such development is done consistently across the market, won't these different technologies result in non-homogeneous feedstock and therefore be a disruptor in the processing?</p> <p>b. Won't this change increase cost? Or, have you discussed the impact of such technologies with the processors?</p> <p>c. Won't such additional cost make it difficult to allocate the costs "equitably"?</p> <p>On page 23, there is a reference to resident awareness.</p> <p>a. For places currently with curbside collection, will the general public be able to tell the difference between the current and MMBC program?</p> <p>b. Are you changing the bins?</p> <p>c. Will consumers really understand that this is a new program? Will it matter if they do not?</p> <p>i. If not, does it make sense to spend too much on communication / advertising (and then have the stewards ultimately pay for that unnecessary cost)?</p>	<p>basis. If producers are carrying out R&D to resolve processing and recycling end-market barriers, MMBC would appreciate being informed of these activities.</p> <p>Producers participating in the PPP producer responsibility programs in Quebec, Ontario and Manitoba do not utilize visible fees at point of sale. Residents in BC are currently recycling PPP through curbside and depots without fees at point of sale. While this is the customary practice with PPP programs around the world, MMBC recognizes that commercial decisions regarding whether these costs are internalized or externalized are up to producers and their customers.</p> <p>a. MMBC will collaborate with PPP producer responsibility programs in other Canadian jurisdictions in order to harmonize the cost allocation methodology. The denominator for the allocation of costs is the quantity of PPP supplied by producers that are members of MMBC to BC residents. b. R&D costs are allocated to the PPP that require these activities. c. Non-recyclable PPP will contribute to the costs of operating the PPP program and managing the recyclable PPP that is the basis for the PPP program performance.</p> <p>a) The sources of fibres used in paper products are already diverse and can be accommodated in paper manufacturing. b) Page 20 contains examples of existing producer initiatives. Producers determine packaging design and will determine cost-benefit. c) Costs incurred in managing the collected PPP will be allocated according to the cost allocation methodology.</p> <p>a. If the existing collector accepts the market-clearing price from MMBC, residents may not see a visible change in their service. b. Bins are supplied by the qualified curbside collector, not by MMBC. c. MMBC will develop a communications strategy which is primarily intended to encourage residents to utilize the collection options as well as inform residents of the role of producers in the producer responsibility program. The most important objective is effective participation in the PPP collection system.</p>	

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Producer	<p>In Section 4.10 Program Financing, the consultation document states "Producers that choose to be members of MMBC are responsible to pay fees that are sufficient, in aggregate, to implement the PPP stewardship plan." How does MMBC intend to prevent free-riders and ensure that stewards in the program are not paying for materials that do not belong to the steward pool? It would create an unlevel playing field to assign costs to stewards that should not belong to them.</p> <p>In this same section, the document talks about encouraging reduction, redesign, and recyclability. It bears noting that in some cases, packaging and packaging requirements are dictated from outside of Canada, particularly, for imported goods. For those importers who have little ability to influence packaging design, encouraging them through negative incentives will have no impact on their ability to improve their packaging's foot print. Also, despite the desire to supply recyclable PPP, product characteristics may not allow for this or recyclable PPP may not have the necessary characteristics to meet expected health, safety or environmental requirements. For example, in some Canadian jurisdictions, pesticide concentrates are banned and therefore legislation prevents the producer from adopting packaging with a friendlier profile. In the case where a producer is unable to reduce or improve recyclability of their packaging, are there other mechanisms by which they might be able to receive 'rewards' .e.g. run a public education campaign with respect to proper recycling of their product packaging?</p> <p>In Section 5.1 Recovery Targets, it is stated that "the quantity of PPP supplied to BC households cannot be accurately quantified until producers report to MMBC." Reporting by producers will not necessarily result in a more accurate quantification of goods supplied to BC households. Due to complex retailer supply chains, goods delivered to a particular province are not necessarily sold there. In order to gain an accurate representation of what is sold into the BC market, a producer, when they are not the direct seller to the public, will need to have access to direct consumer sales data. Will the plan allow for processes whereby a retailer(s) can report on behalf of a producer in order to ensure an accurate representation of PPP in the province?</p> <p>A critical component which still remains unanswered is the estimated cost of the program. How and when does MMBC intend to address this component?</p>	<p>MMBC will invite all PPP producers to be members. MOE is responsible for ensuring that all producers meet their obligations under the Recycling Regulation. MMBC will develop a cost allocation methodology and will consult with producers on the methodology. Producers will need to work with their supply chain to determine the quantity of PPP they supply to BC residents. It is estimated that the current PPP system in BC costs between \$60M and \$100 M. To calculate the cost for each producer, a number of steps must be implemented: all producers that are members of MMBC will report the quantity of PPP they supply to BC residents, likely in Quarter 2 2013; and, MMBC must establish the market-clearing price for collectors, determine the cost for post-collection services and develop its administration and communications budget, likely by Quarter 3, 2013. The fees for producers will be calculated following these activities in Quarter 4, 2013.</p>	<p>No revision to PPP Stewardship Plan; to be considered during implementation</p>
Producer	<p>As noted in the consultation on October 19th, this is still a draft plan, and opportunities exist for MMBC to tighten the program plan elements, provide greater clarity and definition around scope. Further, MMBC is encouraged to provide an increased level of transparency around such program elements as targets, governance and proposed costs. I have outlined the concerns that Target Canada has with the plan in its current state, and hope that these comments will be given careful consideration as the plan goes</p>	<p>Board Governance: The Plan describes the Board as it exists at the time of Plan submission. Printed Paper and Packing Inclusions and Exclusions: MMBC's objective is to harmonize definitions, inclusions and exclusions, wherever possible. Market-clearing Price: Research is required into existing collection costs in order to confirm the methodology for setting market-clearing prices and identify the factors</p>	<p>No revision to PPP Stewardship Plan; to be considered during implementation</p>

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	<p>through its final review and revision before submission on November 19th.</p> <p>Board Governance: There is general concern over the identification of current board member companies within the actual plan. Specifically, there are seats that are “awarded or nominated” but which will change over time. Reference to individual companies should not be included in the plan for fear of leaving that seat held by that company for the life of the plan in its current state. Recommendation to MMBC to restate the board composition to include the seat representatives as retail, industry, government, non-profit, etc., and specific allocation to each, rather than naming companies or associations specifically. Printed Paper and Packing Inclusions and Exclusions</p> <p>It was particularly helpful to the reading, and ultimately the obligated steward, to understand what is included in this plan that is excluded in other plans, or vice versa. This makes a comparison of PPP plans across Canada much easier for stewards with national scope. That said, in an effort to harmonize, it would be even more beneficial to the stewards to ensure consistency amongst definitions, inclusions and exclusions, wherever possible.</p> <p>Market-clearing Price: There is much information desired around the determination of market-clearing price. Specifically, we believe the plan should provide significant detail surrounding the following: initial market-price setting (actual price), the methodology of market-price setting, the frequency of review, and the ability to drive market efficiencies, economies of scale, and a competitive marketplace.</p> <p>Specific Details of the Plan: There are several callouts that MMBC will “assume responsibility” for residential collection systems. We believe that this statement should be detailed further, to allow for clarity on what those responsibilities will include or exclude, such that stewards understand the total cost allocation based on responsibility. If no tight controls are placed on a loose statement such as “assume responsibility”, burdens of the program’s entirety may grow in scope because it wasn’t sufficient tightened prior to plan approval. The plan does not provide the details regarding harmonization for such elements as producer registration, reporting, invoicing, payment collections, third party auditing protocols and compliance. If there is indeed an effort to harmonize, then the harmonization must start at the foundation of the program, and take advantage of the administration functions that are well-established within the marketplace. That said, we would not support the complete adoption of the Stewardship Ontario platform (as an example) as there are elements of other programs which are more effective. MMBC is a</p>	<p>that will drive review frequency. Driving market efficiencies, economies of scale, and a competitive marketplace will be considered. Specific Details of the Plan: Where MMBC enters into agreements with local governments for provision of collection services, local governments will continue to administer delivery of the service. Where MMBC is contracting with the private sector for provision of collection services, MMBC will be responsible for administering delivery of the service. MMBC will be co-operating with the programs in Quebec, Ontario and Manitoba to harmonize producer registration, reporting, invoicing, payment collections, third party auditing protocols and compliance, where possible. Thank you for your comment regarding available sales data. The RFP will reward processors that are innovative, operate cost-effectively and maximize outputs. Post-collection contractors will innovate during the term of their contract with MMBC where it improves their cost-effectiveness and maximizes outputs on which they are paid. MMBC will be holding a webinar for producers (tentatively planned for Quarter 1 2013) to provide additional information for producers, including timing of producer reporting, fee setting and fee payments. Thank you for your comment with respect to audited financial statements.</p>	

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	<p>unique position to benefit from the best that MB, ON and QC have to offer as baselines, in an effort towards harmonization, while simultaneously reducing overall financial burdens to the stewards.</p> <p>The request that 2013 data be supplied by stewards in an effort to inform and guide the fee-setting exercises that are required, may not be feasible for all stewards. For example, Target will not have sales within 2013 in BC until partially through the year. Furthermore, additional detail about what information is being sought, and if there would be any costs, either in 2013 or later, that will be attributable to the data reported in 2013. With respect to the processing of the collected materials, could MMBC please explain how the processors will be encouraged to drive innovation, reduce costs, drive contamination rates downward, and offer continuous improvement solutions to the inherent problems in a recycling/diversion program. Accountability for processor costs must fall to MMBC, and greater clarity around driving efficiency throughout the entire program, is critical to ensure steward support.</p> <p>There are many questions related to costs and timing. The MMBC plan must address the lack of information related to the timing of both reporting and remittance. Stewards must be able to plan for and accrue for the funds associated with this program for 2014. Further on this and in follow-up to comments made at the October 29th consultation, please take note that a Q4 2013 delivery of the 2014 costs associated with the program are, simply put, far too late for the budget process for most stewards. If not firm numbers, it would be best if MMBC would be able to provide a best-guess estimate for packaging material fees by category, from which stewards would be able to provide budget numbers as part of their financial planning processes.</p> <p>Lastly, on the financial side, the plan states that MMBC will not be required to produce audited financial statements. Target would respectfully request that financial statements should still be audited, for the continued transparency of the program for stewards, ratepayers, government and other stakeholders.</p> <p>The plan is strong, allows for steward participation throughout the process, and is driving for a collaborative solution to EPR in the province of BC.</p>		

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Producer	How much will this cost? This is all very well and good... but nowhere does it say, that I can find, how much this will cost! How much do I need to budget?	It is estimated that the current PPP system in BC costs between \$60M and \$100 M. To calculate the cost for each producer, a number of steps must be implemented: all producers that are members of MMBC will report the quantity of PPP they supply to BC residents, likely in Quarter 2 2013; and, MMBC must establish the market-clearing price for collectors, determine the cost for post-collection services and develop its administration and communications budget, likely by Quarter 3, 2013. The fees for producers will be calculated following these activities in Quarter 4, 2013.	No revision to PPP Stewardship Plan; to be considered during implementation
Producer	I note that in the similar recycling plans in Manitoba, Quebec, and Ontario, there are exemptions for producers below a certain size, e.g. below certain annual gross revenue. What is the exemption level planned for BC businesses?	The Recycling Regulation does not establish a de minimis for small businesses. All PPP producers are obligated, notwithstanding the quantity of PPP they supply to residents. It is anticipated that MMBC will consider the appropriate balance of administrative burden when establishing the reporting requirements and fee obligations for producers.	No revision to PPP Stewardship Plan; to be considered during implementation
Producer	Firstly, I would like to congratulate all the fine work that has gone on here. Creating these plans is difficult and requires a lot of effort. Certainly a lot of effort has gone in here. That being said, I do have some concerns from a durables producer perspective. 1. Proposal to limit EPS and Films to depots - EPS and Films are used widely in our business as products range from the 200lb range up to 700lbs. Packaging in our major appliance business is solely used for product integrity - not for display purposes. EPS and film is used as it lightweight, see-through, water proof and fully recyclable. Products protected in this manner have a significantly less damage rate than products packaged with corrugate, primarily because pickers can see the face and recognize they are picking a very expensive item. Of course there are other material properties which provide superior protection. Since Depots represent only 18% of households served the ability for EPS/FILM to achieve the diversion targets is highly questionable. In phase 1 - residential phase we expect that MMBC will honor exemption rates for major appliances in other jurisdictions as the material does not end up in the blue box systems, the material is collected by the delivery agent. MMBC did also not disclose what will happen when EPS/Films enter the residential collection streams, as they will for other items such as small appliances and similar product categories. My concern is the EPS and FILM producers are disadvantaged and subject to segregation and higher costs. 2. Alternatives. With EPS and films we have the ability for alternative materials, compostable, biodegradable etc. MMBC's presentation was underwhelming in terms of supporting these materials and the construction of the hierarchy would suggest they will	The 18% depot service level represents only those households that do not have access to curbside service. Households with curbside service typically also have access to depots. Collecting plastic film and PS film typically drives costs higher for these materials and for the other materials with which they are collected due to cross-contamination and sorting challenges. While it will be challenging to achieve the same collection rate at depots as are typically achieved at curbside, collection at depot is intended to deliver a more cost-efficient and ultimately more effective program by avoiding the cross-contamination and protecting the marketability of plastic film, PS foam and all of the materials in the curbside system. 2) Processing and end-markets are more developed for recycling than for composting and recycling end-markets typically bring reasonable commodity value while composting end-markets typically bring no or lower value, well below the cost to collect and compost. As part of the implementation phase, we are proposing to undertake composition audits of organic waste streams that accept soiled paper packaging and biodegradable packaging to assess the quantity being managed through composting and whether the composting facility can manage these materials effectively. 3) The Letter of Intent is an indication of your intent. MMBC will develop an agreement with producers to be executed during the implementation	No revision to PPP Stewardship Plan; to be considered during implementation

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	<p>either not be accepted or face higher fees. 3. Letter of intent.. I believe the MOE should give MMBC and producers opportunity to consult further on the presentations prior to the requirement for the letter of intent on the 19th. I will express those views to the Ministry directly. At this point MMBC's proposal to EPS and films is of great concern to us and moving forward our sector as well as other durables and manufacturers may have to construct alternate plans. Recognizing competing collectives for material are problematic in the law.. there is no provision. Difficult to express because there is no idea of cost and diversion achievements laid out for us to evaluate. We will need to see significantly more data on the existing infrastructure for EPS/Films, the extent to which other producers are using the material, and alternative approaches to Depot only model to get a greater comfort. These points will also be viable for the commercial consultation. The commercial impact will be significant as retailers/dealers recover and recycle materials from delivered items. Retailers existing contracts with recyclers of these materials will be a point of robust conversation and to the extent the retailer/dealer will continue the practice. We also expect MMBC to be open to compostable and biodegradable alternatives as this has the potential to eliminate traditional EPS/Films and what our consumers are requesting of us. Welcome further dialogue on this matter. Regards</p>	<p>phase (following approval of the stewardship plan by the MOE). We expect to have information on producer costs by Quarter 4 2013.</p>	
Producer	<p>if the packaging material is effectively food wastes or other natural fibres that are fully compostable and biodegradable what is MMBC's position?</p>	<p>Processing and end-markets are more developed for recycling than for composting and recycling end-markets typically bring reasonable commodity value while composting end-markets typically bring no or lower value, well below the cost to collect and compost. As part of the implementation phase, we are proposing to undertake composition audits of organic waste streams that accept soiled paper packaging and biodegradable packaging to assess the quantity being managed through composting and whether the composting facility can manage these materials effectively.</p>	<p>No revision to PPP Stewardship Plan; to be considered during implementation</p>
Trade association for material suppliers	<p>1) The description of the obligated parties as set out in the Introduction is ambiguous and could be read to mean a packaging material provider rather than the packaged product Brand-owner/producer. Recommendation: That the Introduction be modified to clearly state that the obligated party is the Brand owner/Producer of the product using the packaging. 2) The draft plan proposes that as a starting point Polystyrene Foam and Polyethylene Film be collected through drop-off depots. This recognizes the current state of processing technology for these two packaging materials. Further the draft plan identifies the intent to incrementally expand the list of materials as the collection, processing and marketing opportunities and technologies come available. It is important that this open</p>	<p>1) A footnote has been added referring the reader to MMBC's draft definition of producer for purposes of obligation and reporting. 2) Section 5.1 of the PPP Stewardship Plan proposes to collect PPP that is recyclable and expand the list of accepted PPP incrementally as barriers are addressed. Collection of PS foam and PE film at depot is raised in a separate draft document that will be the subject of ongoing dialogue with stakeholders and is subject to revision over time as barriers are addressed. 3) Thank you for your comments which will be considered when finalizing the list of PPP to be collected.</p>	<p>To be considered during implementation. Section 2 has been revised through the addition of a footnote referring to MMBC's draft definition of producer for purposes of</p>

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	<p>but prudent approach not only be applied to expanding the range of materials but is also applied to new opportunities to advance the management of materials already part of the program. For example, the Blue +2 test project clearly demonstrated a method that successfully collected segregated and unitized PS Foam and Plastic Film as add-ons to an existing curbside recyclables collection program, with little or no additional collection cost. However, the test also showed that the processing technology that would maximize the benefit of this collection program needs further development to potentially provide a lower cost alternative to a depot only system for PS Foam and PE Film. The plan needs to be open and flexible enough to take advantage of new innovations and technology that will allow the marketplace to provide lower cost options to manage these two and other materials. Recommendation: That the plan maintain an open and supportive approach to advancing changes in technology and markets at all levels of the system that would allow the marketplace to provide the most cost effective service solutions for the collection, processing and marketing of all packaging.</p> <p>3) The draft list of flexible plastic packaging to be collected under the PPP Stewardship Program takes into account that typical flexible plastics recycling specifications focus primarily on Polyethylene films. However, these specifications also generally have an allowable content for other flexible plastics excluding any with food residues. Also, many of the examples of flexible plastic packaging to be excluded from collection and identified in list's foot notes 5 and 6 are recyclable and have a commodity value in the current marketplace. Further, for these packaging materials that are free of food residues and are processing residuals or are not currently suitable for reprocessing there is a growing use in the production of engineered alternative industrial fuels. While the current market value is low, these materials are already too valuable to waste in disposal. Recommendation: That the plan be structured to collect the broadest stream of flexible plastic packaging, excluding only packaging with food residues, to allow the marketplace to maximize the recycling and energy recovery potentials of this packaging.</p> <p>4) As part of the plan financing discussion there is a provision for R&D funding. The R&D fund could be a critical and positive part of the commitment to continuous improvement and innovation that will maximize the benefits of the Packaging and Printed Papers stewardship program. The R&D funding should be a dedicated resource that is used exclusively for the R&D of new technologies, practices and markets that will expand and enhance the recycling and recovery of packaging. Recommendation: That the plan clearly set out the parameters for the creation of a dedicated funding resource that would be used solely for Research and Development of new technologies, practices,</p>	<p>4) The protocol for financing R&D activities will be considered during implementation.</p>	<p>obligation and reporting.</p>

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	innovations and markets to expand the recycling and recovery of packaging.		
Trade association for material suppliers	<p>We get it that the current BC residential Blue Box “system” is a complicated patchwork of different collection and processing arrangements and control points, with a confusing array of instructions on what does, or does not go, in the box or bag.</p> <p>We get it that this patchwork needs to be transformed into a system that makes sense, is logical in structure, uniform and standardised where possible, harmonised with other programs where applicable, as well as being cost-efficient, effective, and environmentally sound.</p> <p>We get it that the provincially regulated move from 100% municipal control to 100% industry control is a major process change that has to be managed carefully and over time so that the new industry-run and paid-for system evolves with minimum disruption to consumers. We appreciate that other services (such as garbage and organics collection) are inter-related.</p> <p>We get it that politics is always present when regulatory change is in the air: that some municipal leaders don’t want to lose the control they have assumed over the years; that local government workers don’t want to lose their jobs; that some fear competition with the private sector. Many of these local government voices have not exactly been shy in recent months, ratcheting up the political heat and fear-mongering through print and social media.</p> <p>What we don’t get is why the drafters of this plan have so readily caved in and thrown a large bone to the local government lobby. For that is what this particular plan does. In effect, the drafters are saying: “We (industry) will give you the ‘right-of-first-refusal’ on collection and will allow you to continue to base collection on municipal borders. We know it’s not the most efficient way to collect materials but by allowing you to stay in the game maybe you will tone down the rhetoric somewhat and ease the transition.”</p> <p>The rest of the draft plan flows from this key political decision to offer local governments the “right-of-first -refusal” on collection. The private sector (which actually does most of</p>	<p>Thank you for this description of an alternate approach. Zone tendering would effectively replace all existing collection systems and was considered to be disruptive to residents recycling behaviour.</p> <p>Where local governments decline the market-clearing price offer for curbside collection, service areas can be established that will combine municipalities for tendering purposes. The PPP collection system will focus on collecting PPP that is recyclable to safeguard the environmental performance of the system with additional PPP added when recycling end-markets and MRFs are able to accommodate changes. System performance is considered critical and material quality is essential to achieve this objective.</p>	No revision to PPP Stewardship Plan; to be considered during implementation

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	<p>the collection in BC today as contractors “managed” by municipalities) could be effectively shut out of competing directly for collection contracts. It will only get to bid on a piece of the action if the current (mostly local government) collection manager, decides to opt out. A local government wanting to stay in, however, could still seek a private sector contractor to do the actual work on its behalf at a lower cost than the draft plan’s “market clearing price”, then pocket the difference. Why do we need this middleman? Why shouldn’t private sector contractors be able to bid for the service directly? There are major consequences (additional steward costs) that flow from this political decision on collection policy. Now the plan is not just a relatively simple province-wide collection plan based on the best logistics management to get the most material out: now it has to manage alternatives (should a local government opt out) to fit around municipal borders. Now the plan has to have a mechanism its drafters are calling a Market Clearing Price (MCP), an idea that hasn’t worked successfully with printed paper and packaging anywhere else, and should take years of consulting studies to sort out, if ever. Now there will be not one province-wide promotion and education administration but many (one for each of the municipalities opting in, and one from Multi-Material BC when local governments opt out). Even if they get their act together, there’s a duplication of costs here.</p> <p>The most significant extra costs to stewards of this political deal on collection will come from the processing side. Under the “incremental approach” suggested by the drafters of this plan (adding new materials only “when markets become available”), BC processors could be re-designing their material recovery facilities (MRFs) several times: once to adjust to the new collection list currently being floated, then again and again as other materials are added (or maybe not) over the years.</p> <p>This “brownfield” approach is the worst, most costly way to design a system. It is far better to design for the most expected eventualities upfront, a new (greenfield) operation rather than tacking on bits and pieces over time. There’s an extra benefit to going greenfield: a new MRF can be designed to handle all (not just select) printed paper and packaging materials. This leads to another option: why not collect all printed paper and packaging from the start? Sure, not all of it will find ready markets and may have to go to energy-from-waste (EFW) or landfill, but if the steward fees are fair, those non-recyclable materials will pay a penalty for that, which in itself should spur packaging re-design and reduce MRF residue rates.</p> <p>But there’s a problem. Process redesign costs big money: about \$25 million for a decent two-stream MRF, even more (in excess of \$30 million) for a single-stream one. That’s borrowed money that has to be paid back over at least 15 years. And it won’t be loaned</p>		

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	<p>unless there are guaranteed contracts for the supply of materials. So BC processors need long-term contracts. A 5-7 year contract, likely all that would be guaranteed under the draft plan’s requirements to secure tonnage from collection contractors, would be insufficient for processors to even consider innovating by building a greenfield MRF. Allowing processor companies to bid directly for long-term collection contracts in a tendering process supervised by the steward organisation (Multi-Material BC) would at least give them the opportunity to secure that supply, but the BC draft planners have closed that particular door, forcing the processors to negotiate separate contracts with as many as 60 different municipalities. The additional administrative costs of undertaking these multiple negotiations (legal, accounting) will all be passed on to the stewards in their processing costs. So will the “risk costs” of the empty space that has been set aside at the MRF for the “someday” addition of new materials to the collection system. And what happens if the collection contractor changes at some point? Assuming that two seven-year contracts had been signed at the outset, the processor could now be left holding the bag with only half the MRF paid off.</p> <p>Political decisions on collection have consequences (and costs) downstream. What is really frustrating is that there is a viable, logical, industry-led, lower-cost alternative to the draft planners’ current approach, and that the MMBC’s planners have known about this for months.</p> <p>1. Establish collection zones: The province can easily be divided into collection zones based on geographic and demographic factors. Where are the materials and what are the most efficient logistics to capture them? Collection based on municipal borders or where one municipal border happens to run up against another does not make economic sense. What collection zones do, of course, is place the focus on effective and efficient collection, rather than who does it (local government or private sector). Whoever meets Multi-Material BC’s qualifications criteria for collection should be allowed to compete. No one is excluded. Local government bids welcomed. A level playing field. If you don’t perform (whether you are a local government, private sector contractor or subscription service) you are out. Set conditions for the bids so that maximum diversion is achieved. Phase the zones in as existing contracts end, they don’t all have to start at the same time.</p> <p>2. Include all residential paper and packaging from the start: This meets the provincial Environmental Management Act’s Recycling Regulations section 11 (2) that “a producer must operate a collection facility for all products (printed paper and packaging) currently or previously sold...” With this option, all stewards would have the opportunity to have their material collected (and not be paying for a program that doesn’t collect their</p>		

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	<p>particular items). It would create a level playing field between materials (instead of having a funding formula that is over-weighted towards the cost of recycling materials rather than penalising those that aren't), and it would promote a consistent, harmonised, simple message (all printed paper and packaging) to consumers across the province. It would place an increasing emphasis on design for recycling or end-of-life (something the BC ministry also wants), forcing stewards to focus on materials that are not recyclable and/or compostable and likely headed to energy-from-waste or landfill. Steward fees should reflect the province's stated management hierarchy. This option would also allow processors to design now for all materials, and to start processing them immediately, rather than to (as we have noted earlier) pay for the capital costs of empty MRF space and/or adding bits and pieces of equipment to MRFs later (a more expensive option for the stewards who will end up paying).</p> <p>3. Establish collection methods for the province: The type and proportion of materials to be collected (80% paper) and the need to maximise market revenues suggest that a two-stream approach (paper fibres and plastic, glass and metal containers) is a lower cost and efficient option. Single stream (throw everything in the box) tends to become a secondary garbage pick-up with higher residues to be sent to EFW or landfill. Householders have no problem distinguishing between fibres and containers and feel they are doing something for the environment, not simply dumping stuff in a box or bag just to get rid of it. A dedicated truck picking up fibres one week and containers the next is easy to promote and works successfully in Ottawa, and even meshes nicely with garbage and organics collection.</p> <p>4. Let tenders for collection and processing: A single body (MMBC) should control the letting of tenders for collection and processing (with appropriate dispute resolution mechanisms). It makes sense to have one administrative body controlling the big picture (collection, processing, logistics management and communications) and reporting to the MOE. There is no need to perpetuate the current disjointed approach and no need for a Market Clearing Price (MCP) and the endless tinkering that will result. MMBC's role should be to manage and control overall program costs, liaise with local governments, and to stimulate innovation through pilot projects and research and development programs.</p> <p>We know it's late in the day (the just-released-for-consultation draft plan is meant to be in the Minister's hands by November 19), but stewards need to know the consequences of the path they are being led down. There's no question that the grocers need to manage the process. Our concern is that the planners have already given away the store.</p>		

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Trade association for producers	<p>Fee for Service</p> <p>CRFA is concerned that program plan fees in BC will increase annually, without corresponding improvement in environmental outcomes. This is particularly a concern for our members who have or will be introducing material that is not planned to be collected in the recycling program plan. CRFA realizes that MMBC stakeholders have a shared interest in recovering the largest volume of material possible and, as such, recommends that any material for which a fee is paid must receive service demonstrated for that fee. Regardless of the status of current markets for the materials that will not be collected, there are other options in the BC regulatory system that will allow MMBC to divert the material from landfill. For example, the inclusion of energy from waste (EfW) in BC as an option for diversion from landfill provides MMBC with a diversion method that will be critical to meeting the goals of the program plan.</p> <p>Producer fees should reflect a fair and equitable portion of the cost to manage the PPP recycling system and not be based on a next-least-cost-tonne approach where the incentive to improve the overall recycling rate lies with the packaging with the highest recovery rates.</p> <p>Any move by MMBC to determine which materials will be collected through the program must include an assessment of, and pass, the Nexus test for all identified fee-paying materials. This test must apply to any new programs being developed to ensure fairness when developing and introducing waste diversion programs.</p> <p>Nexus is defined as “existing between the quantum a company charges and the cost of service provided. Nexus means that there is a reasonable connection between the cost and service provided. Or, the funding formula used to assess the level of funds each company must pay, must meet the “nexus” test. The “nexus” refers to fees being reflective of the service rendered (i.e. fee-for-service).”</p> <ul style="list-style-type: none"> • Role of the Consumer: The role of the consumer must also be acknowledged and maintained in the EPR framework. BC stewards have taken significant steps to increase recycled content and select packaging that can be diverted. Many of these steps have been taken proactively by companies as environmentally responsible corporate citizens, and in response to consumer demands for environmental accountability. The consumer also must be held responsible for disposing of packaging and other waste appropriately. Stewards cannot shoulder the burden of citizen’s unwillingness to “do the right thing” with packaging that should enter the recycling stream. <p>Recommendation: 1) CRFA recommends that any material for which a fee is paid must receive service for that fee.</p> <p>Potential for Cross-Subsidization</p>	<p>Fee for Service: Once a consistent list of recyclable PPP is collected across BC, MMBC will consider options for managing the remaining materials and the implications of accepting additional materials to the existing collection and processing system and the quality of recyclable PPP. MMBC will encourage residents to ‘do the right thing’ by utilizing the available collection system for their packaging. Potential for Cross-Subsidization: MMBC is proposing to offer local governments (and other collectors) market-clearing price financial incentives set to reflect efficient delivery of PPP collection services. The market-clearing prices will not consider local government costs to dispose of waste. Governance: The PPP Stewardship Plan has been prepared to meet the requirements of the Recycling Regulation. MMBC governance arrangements are not subject to MOE approval. Should multiple agencies for PPP form, MMBC would work collaboratively with the MOE to address issues, such as allocation of material to the various compliance schemes. Thank you for your comments regarding in-kind arrangements. Visible Fees: Section 4.11 states: “Each individual producer will determine for its own business how it will manage the costs incurred to meet its obligations under the Recycling Regulation through membership in MMBC.”</p>	No revision to PPP Stewardship Plan; to be considered during implementation

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	<p>CRFA supports the principle that industry should not be paying to subsidize municipal waste collection operations. We agree with the provisions in the proposed plan that seeks to ensure harmonization across municipal boundaries and improve both the quality and quantity of material that is collected. CRFA supports the MMBC plan commitment to ensuring municipalities do not receive “right of first refusal” for collection services that are not on municipal property.</p> <p>CRFA understands that there is a shared concern across all industry stakeholders that municipal governments will attempt to use MMBC funds to subsidize their existing waste collection programs. We are committed to working with MMBC to ensure that municipalities receiving payment for the management of steward material that is collected via the garbage stream will not result in industry subsidizing municipal garbage collection operations.</p> <p>While industry is responsible for ensuring that steward material is collected and diverted from landfill, along with ensuring that program information is adequately communicated to the public, industry is not responsible for consumer behaviour and should not have to pay for their waste management decisions. As such, CRFA believes that it would be of benefit to all industry stakeholders to include a provision that requires municipalities to adhere to auditing standards, as established by MMBC.</p> <p>Recommendation: 1) CRFA recommends that strict auditing processes be required for municipalities that attempt to recover garbage collection funds from industry via MMBC.</p> <p>Governance</p> <p>CRFA remains concerned regarding the stipulation in the draft program plan to outsource certain administration processes to a third party provider. While the draft does mention which individual actions will be outsourced, it does not clearly identify how governance, accountability, and transparency will be ensured for MMBC stewards.</p> <p>CRFA has previously raised concerns regarding the use of third party service providers during the course of developing the MMBC program plan and we remain concerned due to the lack of information that has been shared with our board members.</p> <p>CRFA recommends that clear rules surrounding governance and the division of responsibilities between MMBC and any third party administrative services provider be developed and included in the final draft of the program plan. While CRFA agrees in principle with the intent of Section 4.9 to harmonize service delivery for stewards and reduce the administrative burden on MMBC, without clear governance, accountability and transparency rules to guide the contracting of service, CRFA is reluctant to support these provisions of the plan.</p> <p>Further, CRFA is concerned that the proposed plan does not clearly articulate the</p>		

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	<p>functions that the MMBC Board will be responsible for. CRFA recommends that more detail should be included in the plan to address the specific actions that the Board will undertake. This includes describing the core roles that the MMBC Board will have; articulating the manner in which committees will be struck to take action on specific issues (such as the development of a market clearing price); and the development of a dispute resolution system to address MMBC Board concerns surrounding the use of data/information to make system wide decisions.</p> <p>The regulation guiding the development of the MMBC program, Reg. 449/2004, makes allowance for producers to determine the method through which they can discharge their recovery obligations. CRFA is concerned that the proposed program plan does not include a guideline for how MMBC will react in the event that a competitive program is established in BC. While individual agreements between producers and MMBC will guide the process through which producers sign onto MMBC and the conditions under which they may leave; CRFA is concerned that the Ministry of the Environment will want to see that MMBC is prepared for the possibility that producers will leave the MMBC system and sign on to a competing program, requiring a mechanism to be developed to allocate material to other compliance schemes.</p> <p>Additionally, in the absence of a financial feasibility assessment, we are concerned with the impact that in-kind contributions could have on the ability of MMBC to operate an effective and efficient PPP program. Due to the current structure of the container deposit system in BC, a number of valuable materials are already outside the purview of the MMBC program plan and will result in lower revenue generation. As a result of the way government has limited the ability of MMBC to operate, CRFA is concerned that allowing in-kind agreements will negatively impact the ability of MMBC to operate a cost effective PPP program.</p> <p>Recommendations: 1) CRFA recommends including provisions in Section 4.9 that would describe the governance relationship between MMBC and any third party vendor that is chosen to provide services to MMBC. 2) CRFA recommends including clear provisions surrounding the roles and functions that the board of MMBC will have during the operational stage of the program. 3) CRFA recommends that a provision be included in the plan that describes how MMBC will manage the withdrawal of a program participant and how the fees/materials collected for that producer will be managed.</p> <p>Visible Fees</p> <p>While the draft program plan indicates that MMBC expects all companies that sign up for MMBC's services to not add a visible environment fee to the price of their product, CRFA recommends that individual stewards and retailers be supplied the flexibility to apply a</p>		

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	<p>visible fee to products. Visible fees provide consumers with information on end-of-life costs, while allowing business the flexibility necessary to ensure pricing can be consistent across multiple jurisdictions. Full EPR with internalized fees eliminates a powerful price signal and education opportunity for the consumer.</p> <p>In restaurants, environmental impact is an essential component of the customer relationship. Customers hold operators responsible every day by measuring product against competitive offerings. Environmental responsibility is a critical competitive measure today. Fee visibility is one way for a company to communicate their environmental responsibilities to the customer.</p> <p>Restaurant customers are extremely price sensitive. For every 1% increase in price, restaurant operators experience a 1% decline in sales. Going forward, a visible fee may be a powerful tool for some operators. Precedents for visible fees with Stewardship programs exist across Canada (e.g. used oil, electronics, and bottle deposit programs). Recommendation: 1) CRFA recommends that the decision to apply visible fees should be made by the retailer or stewards.</p>		
Trade association for producers	<p>CVMA member companies operate across Canada and participate in the Ontario, Manitoba, and Quebec packaging and printed paper programs. It is encouraging that MMBC has stated that it is indeed collaborating with other provinces to harmonize program components that affect stewards. Specifically, we are of the view that MMBC should align with the other provinces to allow the use of sector calculators which permit an efficient approach to calculate the packaging generated by our members. CVMA members use a common auto sector calculator, developed in consultation with the industry funding organizations, to meet their obligations in Ontario, Manitoba and Quebec. This is an essential tool for the OEM vehicle manufacturers who do not contribute a significant volume of packaging and printed paper material into the market, yet the diverse nature of the parts and services offered means it is very difficult and time consuming to collect and report the required information. We request that MMBC permit the use of existing calculators in the program plan.</p>	<p>MMBC will be developing a producer reporting protocol for its members with the objective of harmonizing the protocol. The use of calculators will be considered as part of this process.</p>	<p>No revision to PPP Stewardship Plan</p>
Trade association for producers	<p>Board Governance: Some RCC members have raised a concern regarding how the current Board is described within the program plan. While individual companies have been nominated to the Board, these appointments are made through their respective industry associations to represent their industry sector. The current description of the Board may lead people to believe that these seats on the Board are held by the specific company in question as opposed to seats that are set aside for industry sectors. Recommendation:</p>	<p>Board Governance: Revised Section 2 from 'comprising representatives of producers appointed by' to comprising members appointed by'. Timing of Fee Schedule: MMBC will consider the feasibility of high level estimates of fees in advance of producer reporting of PPP supplied to BC residents. Calculators: MMBC will collaborate with other provincial PPP producer responsibility programs to harmonize producer reporting protocol, including the use of calculators. Audited Financial Statements: The statement in the plan is</p>	<p>Section 2 revised from 'comprising representatives of producers appointed by' to comprising members appointed by'; to be considered during</p>

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	<p>RCC recommends that the description of the Board be altered to clearly state that these individual companies are nominated to the Board as a representative of their respective trade association. This recommendation is made with the understanding the overall governance of the organization, including board composition, will be reviewed and likely altered in advance of the program launch in May 2014.</p> <p>Timing of Fee Schedule: RCC has received a number of requests regarding the timing of when the program costs and a specific fee schedule for MMBC will be made available to stewards. This is a key deliverable for MMBC to ensure that stewards are able to properly forecast the anticipated costs of the program for their respective companies in their 2014 budgets. The current proposal to provide these costs in the 4th Quarter of 2013 will likely be too late in the budget cycle for most RCC members, many of whom will have finalized their 2014 budgets by this time.</p> <p>Recommendation: RCC recommends that MMBC provide high level estimates of the anticipated costs by material by the end of the 2nd Quarter in 2013 to assist our members and other stewards with their 2014 budget planning.</p> <p>Calculators The use of calculators to help stewards determine their obligations have been used extensively by retailers in the other existing stewardship programs, as our members in many cases do not possess the specific information required for reporting their obligations. While many retailers have begun to collect the specific material information required for stewardship reporting from their supply chain partners, a number of our members still require the option of calculators to assist them in determining their financial obligations.</p> <p>Recommendation: RCC recommends that MMBC confirm that calculators will be provided to help retailers and other stewards determine their financial obligations for the program.</p> <p>Audited Financial Statements The proposed plan states that MMBC will not be required to produce audited financial statements. This is not consistent with the transparent approach our members expect from stewardship agencies that represent them.</p> <p>Recommendation: RCC recommends that the plan be amended to specifically state that MMBC will publish audited financial statements on an annual basis beginning in 2015.</p> <p>Thank you for the opportunity to provide comments on the draft PPP plan. Our members</p>	<p>consistent with the requirement of the Recycling Regulation. MMBC can determine whether it wishes to make its audited financial statements available to its members or to publish the statements.</p>	<p>implementation</p>

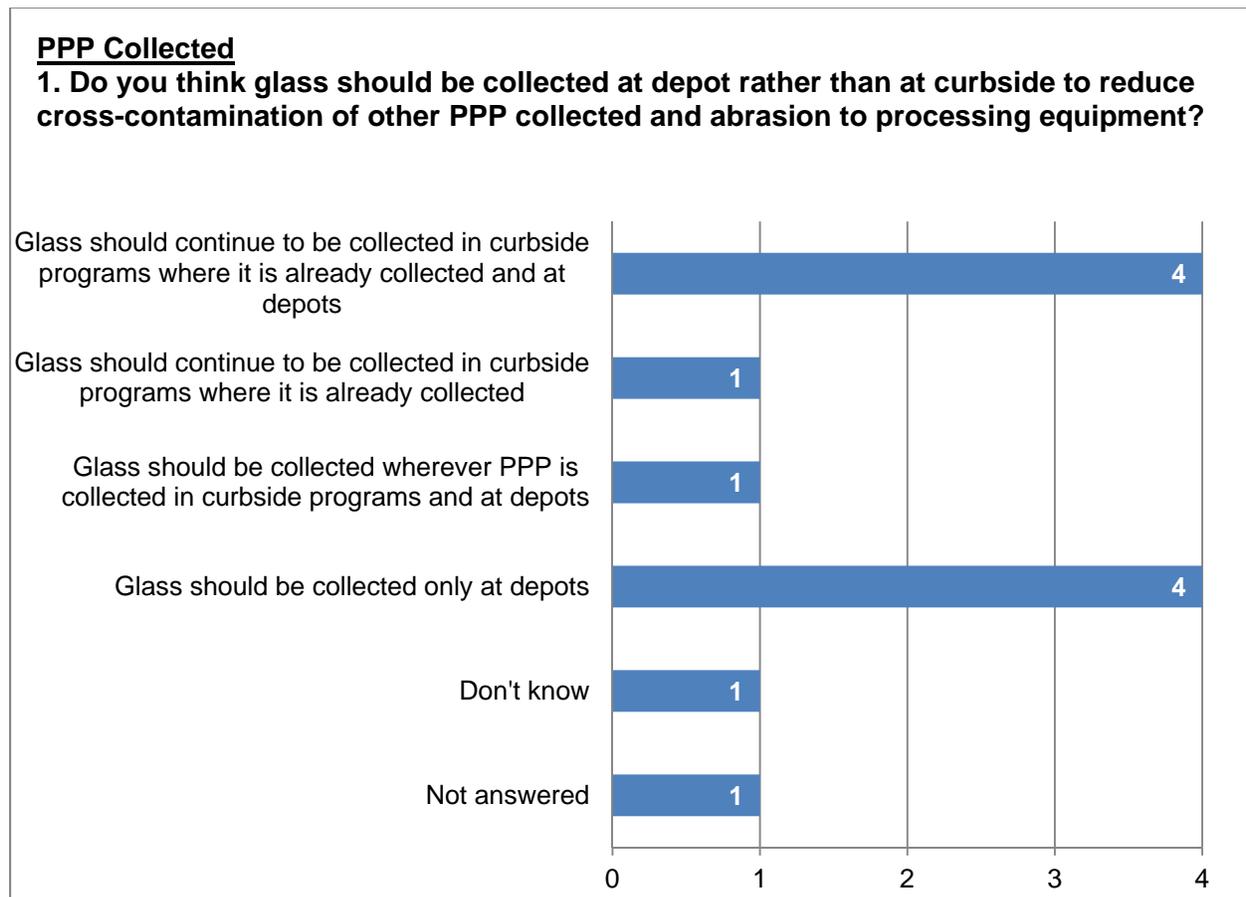
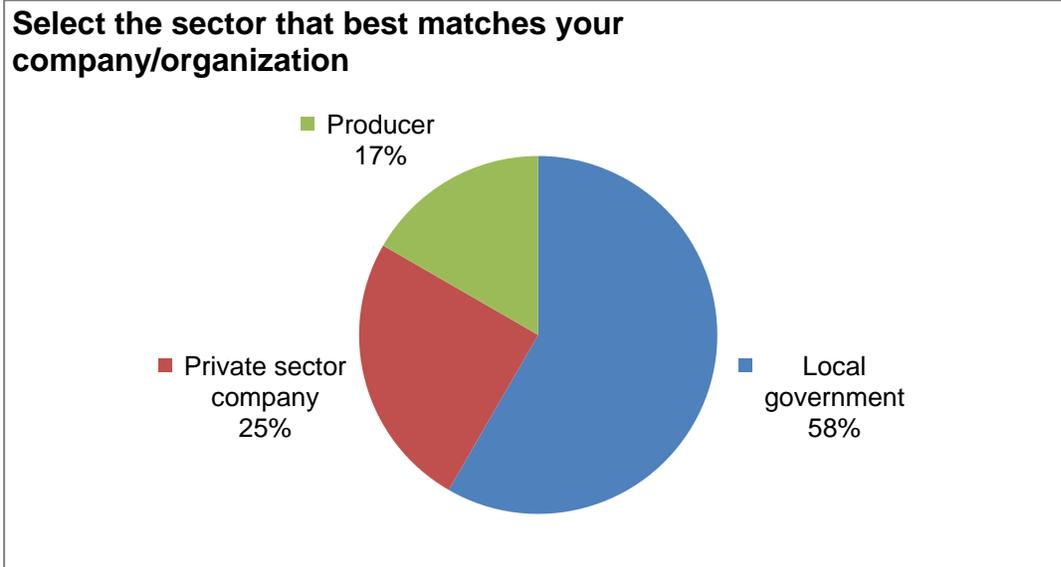
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	are supportive of the innovative approach outlined in this plan as a means of developing a system that can achieve strong performance through the implementation of a cost-effective and efficient market-driven system.		
Trade association for recycling collectors and processors	<p>Our members’ biggest concern is that the growing diversion industry that exists in the province not be restricted from being able to continue to grow and prosper and build on existing successes.</p> <p>As an association, we believe that we are well poised to Multi Materials BC achieve the diversion goals set forth by the Government of British Columbia. Efficient and cost effective diversion can best be accomplished if access to the market remains competitive.</p> <p>With the ever evolving changes in packaging, BC needs an EPR plan that encourages innovation and creativity to ensure that the system continues to divert all PPP to its fullest potential. This is best encouraged by allowing the market to continue to operate naturally in an open and transparent manner.</p> <p>Overall, WMABC provides the following summary of our overarching feedback regarding this program and the consultation process:</p> <ul style="list-style-type: none"> • We fully support the goals of EPR; • To ensure the sustainability of the program, we believe that a world class system in-BC EPR program must involve a wide range of industry players, premised on local service delivery; • The proposed PPP EPR plan will have deleterious effects on the BC diversion industry and in the long term prove to be economically unsustainable; • As a key stakeholder in BC, the WMABC was not adequately consulted, the consultation was hurried and rushed and has only really occurred after the development of an ill-conceived plan that does not recognize the day-to-day activities of the industry within British Columbia; • The development of the PPP EPR program is of critical importance to the producers and all of the industries stakeholders. Disruption of our businesses through the proposed plan will preclude future capital investment thereby diminishing the potential performance of the EPR PPP system; and • Consistent with the message we have been trying to convey to MMBC since the release of the Phase I plan in February, we are here to assist as required and are committed to participating in a thorough and meaningful dialogue. <p>The best way to ensure a healthy and vibrant diversion and recycling industry in the province of British Columbia is to ensure the continued operation premised on a fair,</p>	The PPP Stewardship Plan is intended to support a fair, open and competitive marketplace to deliver efficient, effective and innovative PPP services.	No revision to PPP Stewardship Plan; to be considered during implementation

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	open and competitive marketplace. This approach will help keep costs contained, encourage innovation, and reward entrepreneurs interested in serving the BC marketplace, within British Columbia.		

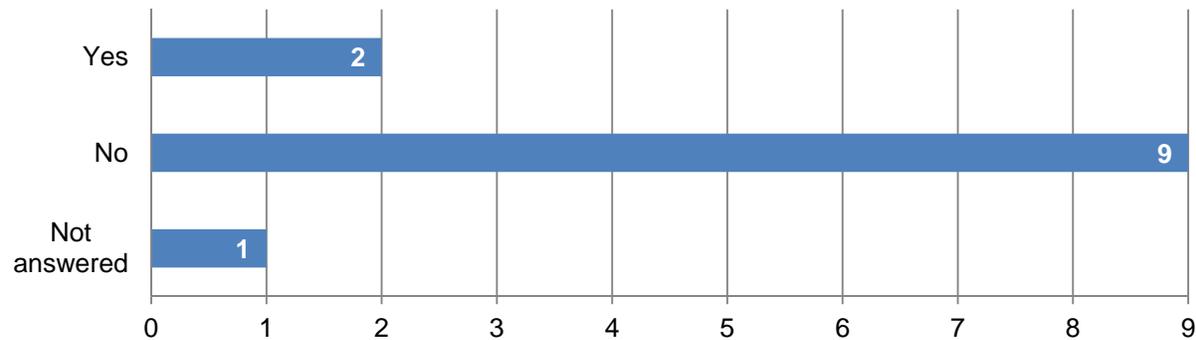
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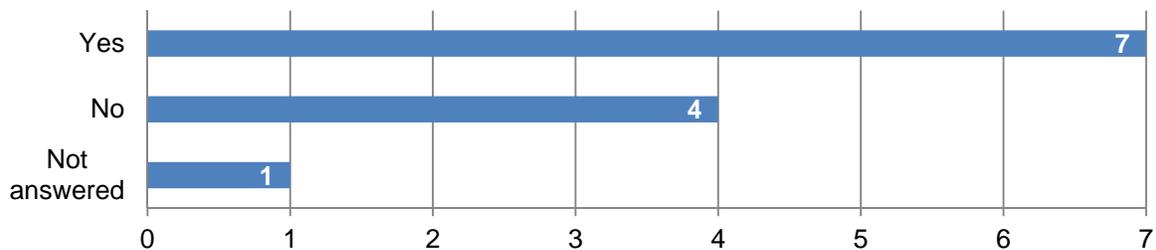
PPP Collected

2. Knowing that plastic film commingled (e.g., mixed in) with other PPP can be difficult to sort effectively, should plastic film be collected only at depots?



PPP Collected

3. Given the proposed list of PPP to be collected under the MMBC program, will changes be required to your curbside collection system?



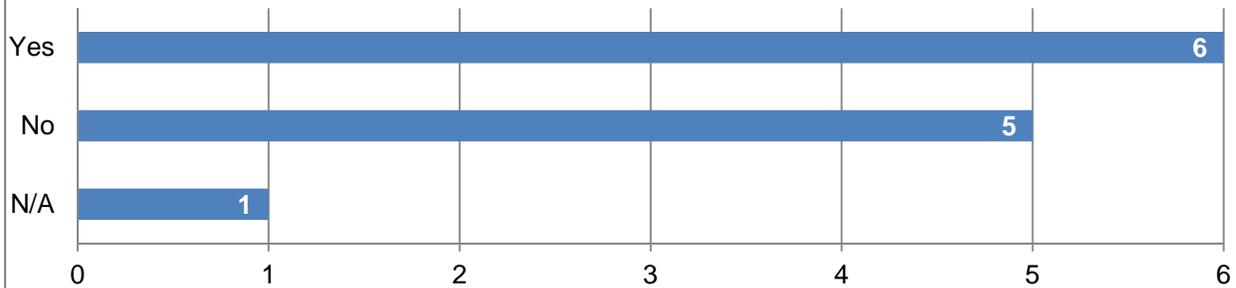
If yes, what changes need to be made to your curbside program?

- Additional types of packaging accepted
- Introduce curbside collection program
- Remove books, plastic film, commercial properties where co-collected with residential
- More volumes will require bigger or different trucks

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PPP Collected

4. Given the proposed list of PPP to be collected under the MMBC program, will changes be required to your depot collection system?

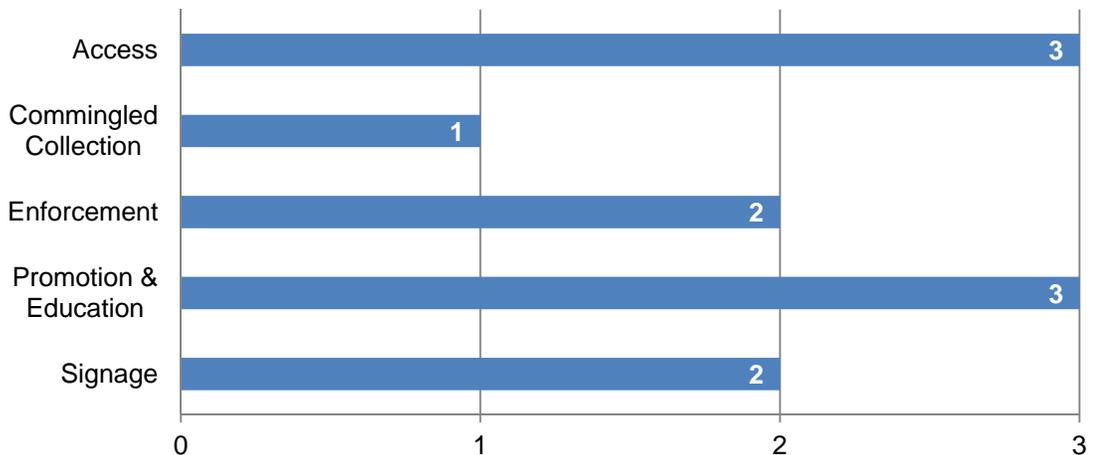


If yes, what changes need to be made to your depot program?

- Upgrade depot
- Modify internal layout and equipment
- Perhaps more bins
- Remove books, handle plastic film separately, segregate commercial
- Accept PS foam

Collection

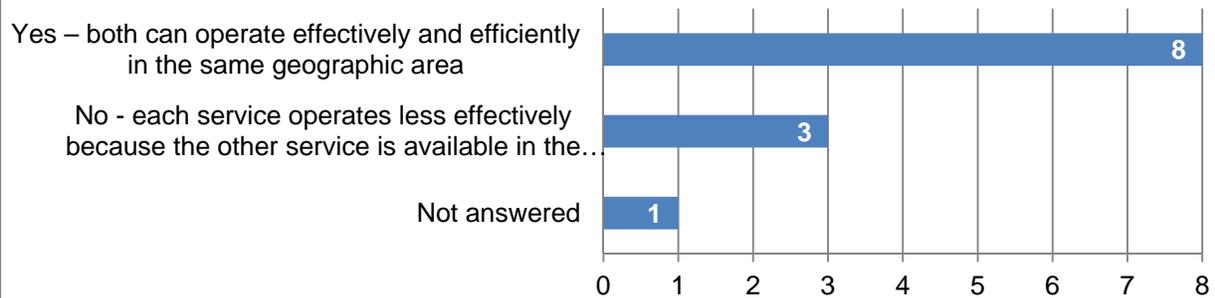
1. What are the best mechanisms you've identified to overcome the barriers to participation in PPP recycling programs in multi-family buildings?



Consultation Summary for Packaging and Printed Paper Stewardship Plan

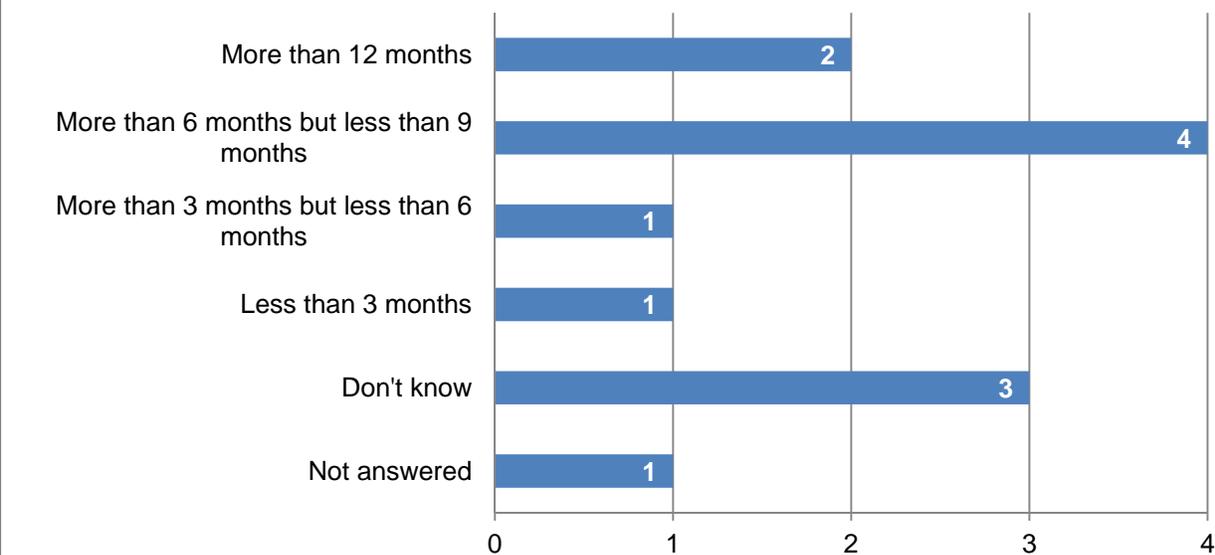
Collection

2. Can curbside collection of PPP co-exist with depot collection of PPP without compromising the effectiveness of either service?



Collection

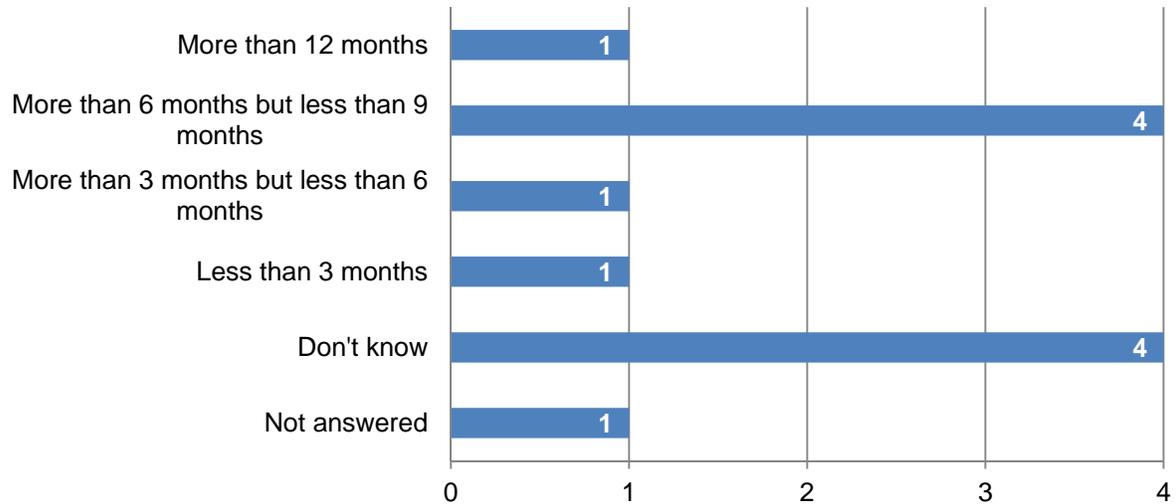
3. Given the proposed changes to the list of PPP collected and the relationship between collectors and processors, how much time do you need to be ready for a May 2014 implementation date?



Consultation Summary for Packaging and Printed Paper Stewardship Plan

Post-collection

1. Given the proposed changes to the list of PPP collected and the relationship between collectors and processors, how much time do you need to be ready for a May 2014 implementation date?



Post-collection

2. What is the preferred length of a post-collection services contract, weighing the need for amortization of capital costs against providing opportunities for innovation?

