

July 31, 2019

The Honourable George Heyman
Minister of Environment and Climate Change Strategy
PO Box 9047 Stn Prov Govt
Victoria, BC V8W 9E2

Dear Minister Heyman,

Subject: Request to include Industrial, Commercial, and Institutional (ICI) Recycling in the Recycling Regulation

Throughout North America, BC is recognized as a leader in Extended Producer Responsibility (EPR) programs. In particular, the addition of Packaging and Printed Paper (PPP) to the Recycling Regulation in 2014 has resulted in better access to recycling services province wide. Many small rural communities now have access to recycling, which was not economically viable prior to this change. We believe EPR programs set the framework for stable, long term end markets for recyclable material to be created here in British Columbia.

We are writing to request that the Recycling Regulation be amended to include PPP from the Industrial, Commercial, Institutional (ICI) sector. Presently there is a gap in service to many members of our communities. The ICI sector, including small businesses, schools, hospitals, municipal offices, care homes, and tourism resorts are often left with no viable option for recycling. Because PPP from the ICI sector is not included in the provincial EPR program, many of our regions have seen an increase in recyclable material ending up in landfills.

Furthermore, in many cases fees are paid into the Recycle BC program for products that are not accepted in the Recycle BC system, simply because of where the material is discarded. For example, a paper cup from a coffee shop can be recycled by a resident (either at depot or curbside), but the same paper cup can't be recycled at a school, public library, or senior's home. In our experience, trying to distinguish between ICI and residential PPP is challenging, frustrating, and arbitrary.

We recognize this challenge is heightened by the drastic changes in the global commodity market for recyclables. We also recognize that we are moving into a new reality where countries need to develop more capacity to process recyclable material locally, instead of shipping to overseas markets. As the current Recycle BC system controls a large portion of PPP in the province, there is little opportunity or incentive for competing commercial recycling companies to expand. In some cases, commercial recycling companies have reduced service because there is less material on the open market. We feel that regulating ICI recycling will give industry more confidence to invest in technology to process materials within the province.

At present, most Regional District's are in a dilemma. Do we step in to provide recycling services to the ICI sector at a significant cost to the tax payers, or do we allow recyclable materials to end up in our landfills? Each of the undersigned RD's have unique characteristics and are responding to this challenge in different ways. However, we are united in our view that adding ICI PPP to the Recycling Regulation will accomplish the following:

- Improve the level of service to businesses and institutions in our communities;
- Create framework for processing recycling materials in BC;

- Remove the burden of handling ICI recycling from taxpayers; and
- Reduce recyclables going to landfill.

We, the undersigned, urge you to give serious consideration to adding ICI generated PPP into the Recycling Regulation, enabling appropriate collection and processing of these materials. We see this as a natural and crucial next step for EPR programs, showing that BC will continue to be a leader in waste reduction policy.

Thank you for your time and attention on this matter. We look forward to hearing from you.

Sincerely,

THOMPSON-NICOLA REGIONAL DISTRICT

Chair

****Add more signatures as needed**