

COLUMBIA SHUSWAP REGIONAL DISTRICT

PO Box 978, 555 Harbourfront Drive NE, Salmon Arm, BC V1E 4P1 T: 250.832.8194 | F: 250.832.3375 | TF: 1.888.248.2773 | www.csrd.bc.ca

June 1, 2018 5360 01

VIA EMAIL: ENV.Minister@gov.bc.ca

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

Dear Minister Heyman:

RE: Recycle BC Stewardship Plan Update

At the Columbia Shuswap Regional District (CSRD) Board meeting held on May 17, 2018, the Board endorsed a resolution to send a letter to the Minister of Environment which outlines the CSRD's concerns with Recycle BC's proposed stewardship plan updates (see attached staff report for your reference).

Recycle BC is currently conducting a review of its stewardship program and CSRD staff participated in a consultation process and provided feedback and input to proposed changes in the program. Specifically, the following section from Recycle BC's March 2018 Packaging and Paper Product Extended Producer Responsibility Plan will have serious impacts on the CSRD's ability to establish new curbside recycling programs:

4.3.2 New Curbside Programs

Local governments in communities that did not have PPP curbside collection programs by May 2014, when the program was launched, are eligible to join the Recycle BC program as contracted collectors if they implement a PPP curbside collection program, provided each of the following criteria is met:

Packaging and Paper Product Extended Producer Responsibility Plan

- 1) A curbside garbage collection program was in place by May 2014;
- 2) The community represents an incorporated municipality; and
- 3) The community has a minimum population of 5,000 residents.

If this section is accepted by the Province, the District of Sicamous, six Electoral Areas within the CSRD, and numerous other communities within British Columbia will not be eligible to receive any Recycle BC incentives to administer new curbside collection programs in the future. New curbside collection programs initiated to increase diversion of packaging and printed paper will have to be funded solely by the taxpayer. The stewardship group responsible for collecting packaging and printed paper should be responsible for funding new curbside collection programs. This section creates a disincentive that will unfairly marginalize communities, creates assumptions about provincial program motivations, decreases overall program effectiveness and severely reduces the likelihood of program development in smaller urbanized areas.

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Furthermore, on January 1, 2015 the CSRD entered into an agreement with Recycle BC and accepted the market-clearing financial incentive to deliver depot collection at the CSRD's 18 recycling collection depots. In order to fund the total cost of the CSRD's recycle depot program, the CSRD contributes \$500,000 annually through taxation, in addition to the financial incentive received.

Tax funded subsidies should be acknowledged and addressed in the March 2018 Packaging and Paper Product Extended Producer Responsibility Plan (Plan). Tax funded subsidization is inconsistent with the stewardship model stated in the Plan that, "the recycling program is funded by businesses that supply packaging and paper products to BC residents".

The CSRD is requesting the Ministry give serious consideration to the concerns contained within this letter. We look forward to continuing to work with Recycle BC to ensure that all British Columbians have access to the Recycling BC services through a fully funded producer responsibility stewardship model.

Yours truly,

COLUMBIA SHUSWAP REGIONAL DISTRICT

Thoma Martin

Per:

Rhona Martin, Chair

Enclosure