

Packaging and Printed Paper Stewardship Plan

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1. Introduction

The British Columbia (BC) Recycling Regulation (B.C. Reg. 449/2004 – the “Regulation”) under the *Environmental Management Act* requires that, as of May 2014, every producer¹ of packaging and printed paper (PPP) product that wishes to sell, offer for sale or distribute their products to residents in British Columbia must operate, or be a member of, an approved plan concerning the end-of-life management of their products. The Regulation further stipulates that producers wishing to receive BC Ministry of Environment approval for such a plan must submit their plan to the Ministry on or before November 19, 2012.

The proposed stewardship plan is unique in that it deals with the residential packaging and printed paper product category that is already being recovered at an estimated 50% to 57%² recycling rate through local government and not-for profit and private sector initiatives. This plan is different from other plans developed for BC where limited collection services or no collection services were in place prior to the material being added to the Recycling Regulation.

The PPP Stewardship Plan outlined in this document proposes to build on these existing services in order to minimize economic dislocation for those currently operating the system, to avoid confusion for residents, and to mitigate any potential temporary loss of environmental performance. Building on the current operating recycling system through development of commercial partnerships with existing economic players is considered the most responsible, economically efficient and environmentally prudent approach to maintaining and enhancing the recovery of residential PPP in BC.

2. The Stewardship Agency

This proposed stewardship plan for PPP has been developed by Multi-Material British Columbia (MMBC) pursuant to the requirements of the Regulation.

MMBC is a not-for-profit agency established under the British Columbia Society Act formed in anticipation of the requirement to develop, submit and implement a stewardship plan for packaging and printed paper. MMBC is acting as a stewardship agency on behalf of producers³ in order to discharge their obligations under Schedule 5 of the Recycling Regulation.

¹ Section 1 of B.C. Reg. 449/2004 defines "producer" of packaging and printed paper as,

- (i) a person who manufactures the product and sells, offers for sale, distributes or uses in a commercial enterprise the product in British Columbia under the manufacturer's own brand,
- (ii) if subparagraph (i) does not apply, a person who is not the manufacturer of the product but is the owner or licensee of a trademark under which a product is sold, distributed or used in a commercial enterprise in British Columbia, whether or not the trademark is registered, or
- (iii) if subparagraphs (i) and (ii) do not apply, a person who imports the product into British Columbia for sale, distribution or use in a commercial enterprise.

² Refer to the report titled the *Current System for Managing Residential Packaging and Printed Paper in BC*, March 2012.

³ Refer also to draft Definition of Producer for Purposes of Obligation and Reporting on MMBC website.

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MMBC is governed by a Board of Directors comprising members appointed by the Retail Council of Canada, Food and Consumer Products of Canada, Canadian Federation of Independent Grocers, Canadian Restaurant and Foodservices Association, Loblaw Companies Limited, Overwaitea Food Group, Tim Hortons and McCain Foods.

MMBC is acting on behalf of its members who are producers of PPP in submitting this stewardship plan. For the purposes of the PPP Stewardship Plan, the producer for a specific unit of packaging or printed paper is the supplier of service packaging or the first of the following: brand owner, the franchisor or the first seller (also known as the first importer).

3. Packaging and Printed Paper

In October 2004, the province passed the Recycling Regulation. In May 2011, the Regulation was amended to include Schedule 5 which added packaging⁴ and printed paper from residents and streetscapes⁵ as product categories.

3.1 Packaging

British Columbia's *Environmental Management Act* defines packaging as "a material, substance or object that is used to protect, contain or transport a commodity or product, or attached to a commodity or product or its container for the purpose of marketing or communicating information about the commodity or product".

Schedule 5 does not further refine the definition of packaging beyond that provided in the *Environmental Management Act* as described above.

Packaging for purposes of producer obligation and reporting⁶ under the PPP Stewardship Plan includes:

- (a) Primary packaging, i.e., packaging that contains the product at the point of sale to the residential consumer;
- (b) Grouped packaging or secondary packaging that goes to the household⁷;
- (c) Transportation, distribution or tertiary packaging that goes to the household⁸;
- (d) Service packaging designed and intended to be filled at the point of sale and "disposable" items sold, filled or designed and intended to be filled at the point of sale such as:

⁴ Schedule 1 of the Recycling Regulation addresses beverage containers which are managed under a provincial deposit return program, with the exception of milk containers which are excluded from the deposit return program.

⁵ Refer to Section 3.3 for a description of streetscapes.

⁶ 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 recycling end markets are proposed to be collected from residents at program launch in May 2014. Refer to Section 4.1.

⁷ Multiple packages of product sold in a unit, often wrapped in film plastic.

⁸ May be both the primary packaging for the product and the packaged used to ship the product but is referred to as transportation packaging that goes home with the consumer. For example, household products packaged in corrugated boxes intended for final use or management by the consumer or end user.

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- Paper or plastic carry-out bags provided at checkout;
 - Bags filled at the shelves with bulk goods, produce, baked goods, etc.;
 - Disposable plates and cups;
 - Take-out and home delivery food service packaging such as pizza boxes, cups, bags, folded cartons, wraps, trays, etc.;
 - Flower box/wrap;
 - Food wraps provided by the grocer for meats, fish, cheese, etc.;
 - Prescription bottles filled and provided by pharmacists;
 - Paper envelopes for developed photographs;
 - Gift wrapping/tissue paper added by the retailer; and
- (e) Packaging components and ancillary elements integrated into packaging, including ancillary elements directly hung or attached to a product and which perform a packaging function unless they are an integral part of the product and all elements are intended to be consumed or disposed of together⁹.

For the purposes of the PPP Stewardship Plan, paper packaging means all paper materials regardless of the cellulosic fibre source of the material including but not limited to wood, wheat, rice, cotton, bananas, eucalyptus, bamboo, hemp, and sugar cane (bagasse) fibre sources.

The plan does not apply to items covered by other stewardship programs, non-PPP items or PPP items used solely in industrial, commercial and institutional facilities.

3.2 Printed Paper

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”.

For the purposes of the PPP Stewardship Plan, printed paper comprises any type of cellulosic fibre source including but not limited to wood, wheat, rice, cotton, bananas, eucalyptus, bamboo, hemp, and sugar cane (bagasse) fibre sources.

3.3 Sources of Packaging and Printed Paper

Under Schedule 5 of the Recycling Regulation, the packaging and printed paper program is to address residential premises and municipal property that is not industrial, commercial or institutional property.

⁹ Examples of this kind of packaging include, but are not limited to: labels and lids hung directly on or attached to the packaging; mascara brush which forms part of the container lid; staples, pins, clips; toy on the top of a candy product which forms part of the lid; devices for measuring dosage that form part of the detergent container lid; plastic make-up case; brush contained in the lid of corrective liquid paper; zipper on a plastic film bag containing a product.

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Residential premises¹⁰ are:

- Single-family dwellings inhabited year round or seasonally¹¹; and
- Multi-family dwellings including rental, co-operative, fractional ownership, time-share, condominium¹² and seniors residences¹³.

Municipal property that is not industrial, commercial or institutional property comprises the following which are collectively referred to as 'streetscape' in this stewardship plan:

- Sidewalks which are municipal property, which adjoin buildings in an urban commercial area and which are used for pedestrian traffic;
- Plazas or town squares which are municipal property and which are available to the public; and
- Parks which are municipal property.

4. Program Design

4.1 BC Packaging and Printed Paper Reverse Supply Chain

BC residents who participate in PPP recycling programs and collectors and processors of PPP can be characterized as a reverse supply-chain that moves PPP from residents to recycling end-markets. The reverse supply-chain comprises millions of BC residents served by hundreds of collectors who deliver PPP to dozens of PPP processors who then market the material to dozens of end-markets both in and outside of British Columbia.

Local governments are currently the primary drivers of residential PPP collection and recycling activity – they either deliver PPP collection and processing directly or contract for those services with private or not-for-profit collectors and processors. In some cases, residents contract directly with private collectors for PPP collection or drop off PPP to private or not-for-profit depots for recycling.

Collection and processing of PPP involve varied and complex relationships between private, public and not-for-profit entities to move PPP from residents to recycling end-markets. The role that each plays is described below:

¹⁰ Section 1 of the Recycling Regulation defines "residential premises" to include houses, apartments, condominiums, town homes and other premises in which persons reside but does not include institutional accommodations or visitor accommodations.

¹¹ Vacation facilities, such as hotels, motels, cottages and cabins, are considered commercial operations.

¹² Vacation facilities, such as rental, co-operative, fractional ownership, time-share or condominium accommodation associated with sports and leisure facilities (e.g., ski resorts), are considered commercial operations.

¹³ Residences at which medical care is provided, such as nursing homes, long-term care facilities and hospices, are considered institutions.

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PPP collection is provided by:

- Local governments and First Nations governments delivering PPP collection services directly, supported by public education, promotion and first point of contact for collection service customers;
- Local governments and First Nations governments utilizing not-for profit organizations or private sector companies to provide the collection services, supported by local government or First Nations government delivery of public education, promotion and first point of contact for collection service customers;
- Private sector PPP collectors delivering collection services through subscription;
- Private depots receiving PPP delivered by residents; and
- Not-for-profit depots¹⁴ receiving PPP delivered by residents.

PPP processing is provided by:

- Local governments delivering PPP processing directly;
- Local governments utilizing private sector PPP processors or not-for-profit organizations; and
- Private sector PPP processors which may be vertically integrated with collectors (i.e., the same company provides collection and processing services) or may provide processing services to local government collectors, private collectors, private depots and not-for-profit depots.

4.2 Packaging and Printed Paper Program Delivery Principles

Selecting the PPP program design has been driven by one overarching objective – continuous improvement in recovery effectiveness and efficiency without undermining existing PPP recovery efforts in British Columbia.

To achieve the objective of maximizing outcomes while minimizing dislocations, MMBC has developed the following market engagement principles to guide the development of the PPP Stewardship Plan:

- **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 behaviour that increases recovery activity throughout the PPP reverse supply-chain; simple rules will provide clarity and certainty to those collecting and recycling PPP;
- **Foster interaction, collaboration and competition to drive innovation** – innovation is the result of complex interactions of ideas and efforts among producers and private,

¹⁴ Not-for-profit depots may or may not have a funding relationship with their local government.

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public and not-for-profit entities with parties bringing together complimentary skills to collaborate and deliver more value; and

- **Set the stage for evolution** – harness existing activities and build on success through continuous improvement and use of economic incentives to increase collection of PPP and improve system efficiency.

4.3 Packaging and Printed Paper Program Delivery Overview

Under the Recycling Regulation, MMBC will assume responsibility for driving residential PPP collection and recycling activity in BC, effectively supplanting the role that local governments have historically played. Accordingly, at the outset, it is assumed that MMBC will largely assume responsibility for the existing BC PPP collection and recycling system and will set conditions for future improvements in effectiveness and efficiency of PPP recovery in BC.

The approach that MMBC has chosen to do this involves direct and separate interaction with collectors and primary processors based on two core elements:

- An agreement between MMBC and each qualified collector and qualified primary processor setting out the activities to be performed and the outcomes to be achieved (e.g., collected tonnes successfully delivered to processors, households serviced, tonnes of PPP marketed, etc.); and
- Payment to qualified collectors and primary processors upon verification that the outcomes specified in their agreements have been achieved.

The nature of the agreements and how the agreements are entered into differ between collectors and processors, as described below.

4.4 Collection of Packaging and Printed Paper from Residents and Streetscapes

The approach to delivery of PPP collection services¹⁵ 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.

Qualified collectors will be offered financial incentives for PPP collection¹⁶. The value offered will be established as market-clearing prices¹⁷. Consistent with an outcomes-based approach to program operation, MMBC will pay collectors once the PPP they have collected has been accepted for processing by a primary processor under contract with MMBC.

¹⁵ Also refer to Section 5.2 Accessibility.

¹⁶ The financial incentive will be offered for collection services. Collection services are distinct from post-collection activities which include receiving PPP from collection vehicles, picking up PPP from depots and consolidation and transfer where required.

¹⁷ A market-clearing price is a payment available to collection service providers (subject to executing an agreement to provide the collection service, comply with the collector qualification standard on a continuous basis, report specified data on a defined schedule) designed to stimulate collection activities and act as a market clearing mechanism.

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MMBC will establish a set of collector qualification standards¹⁸ that will include basic qualifications common to all PPP collectors today as well as additional requirements¹⁹ for tracking and reporting sources and quantities of collected PPP. Local governments, private companies and not-for-profit organizations that meet these collector qualification standards will be qualified as MMBC collectors, subject to the following approach.

MMBC will engage qualified collectors as follows:

- **Where single-family and multi-family residents deliver PPP to curbside^{20 21} in areas that meet the reasonable access criteria²²,**
 - MMBC will offer a financial incentive to a local government or First Nation government for the provision of services that include PPP curbside collection services, public education, promotion and first point of contact for curbside collection service customers; and
 - Where the local government or First Nation government declines the offer, MMBC will implement a competitive procurement process for curbside collection services, will select a service provider to provide PPP collection services²³ and will provide public education, promotion and management of collection service customers through its own means.
- **Where multi-family residents deliver PPP to a central storage area accessible by all residents of the multi-family complex²⁴ and collection occurs from this central storage area,** MMBC will offer a financial incentive for multi-family building PPP collection services to any interested party that is able to comply with the collector qualification standards:
 - 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; and
 - 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.
- **To operate depots for receiving PPP from residents** generated from single-family and multi-family households, MMBC will offer a financial incentive to any interested party

¹⁸ Also refer to Section 4.6 Collector and Processor Qualification Standards.

¹⁹ Collectors will be required to provide free access for residents to the collection services being provided by the collector through its agreement with MMBC as part of the qualification standards.

²⁰ While the majority of PPP diverted is collected in dedicated recycling systems, some local governments accept specific types of PPP, such as soiled paper packaging, in organic waste collection programs. MMBC will undertake research to determine the quantity of PPP in organic waste collection programs and will, if the quantity is significant, develop a market-clearing price financial incentive reflecting the portion of PPP in the organic waste stream. Should local governments decline the offer, MMBC will not directly undertake collection of organic waste given the relatively small portion of PPP compared to food waste in this collection stream.

²¹ Excluding containers stored on a public street or lane with special permission of the local government.

²² Refer to Section 5.2 Accessibility.

²³ MMBC will work with the local government to co-ordinate delivery of PPP collection service by MMBC and delivery of garbage collection service by the local government.

²⁴ Excluding single-family dwellings with suites and/or laneway houses and converted single-family dwellings, duplexes, triplexes and fourplexes.

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that is able to comply with the collector qualification standards for PPP collection services contingent on the types of materials accepted from residents:

- 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; and
 - 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.
- **To service streetscapes in areas that meet the reasonable access criteria²⁵,**
 - MMBC will offer a financial incentive²⁶ to the local government for the provision of services that include PPP collection services²⁷, public education, promotion and first point of contact for collection service customers; and
 - Where the local government declines the offer, MMBC may implement a competitive procurement process for PPP streetscape collection services, may select a service provider and may provide public education, promotion and management of collection service customers through its own means, subject to reaching agreement with the local government on the management of the garbage component of streetscape system.

Recognizing that local governments are providing PPP collection services through contractors and that, in some cases, these contracts extend beyond the May 2014 implementation of the PPP Stewardship Plan, the contract transition period will be managed as follows:

- Curbside collection service
 - To be applied where a local government accepts the market-clearing price financial incentive to provide curbside collection, the collection service is delivered by a contractor and the collection contract term ends after May 2014.
 - The term of the contract between MMBC and the local government will be aligned with the expiry date of the contract between the local government and its collection contractor.
 - Alignment of contract expiry dates allows the local government to consider its options at the expiry of its collection contract. One of the options would be to retender the curbside collection service and continue to accept the market-clearing price under a new contract with MMBC.
- Multi-family building collection service
 - To be applied where a local government accepts the market-clearing price financial incentive to provide multi-family building collection, multi-family buildings are mandated through municipal bylaw to pay for local government PPP

²⁵ Refer to Section 5.2 Accessibility.

²⁶ Prior to offering a financial incentive for streetscape collection services, MMBC will conduct audits of PPP and garbage in existing streetscape collection programs and conduct one or more pilot projects in order to develop a preferred approach to streetscape collection and recycling services.

²⁷ Streetscape collection activities include collection of PPP generated by routine pedestrian traffic and by those participating in public events where waste management services are provided by local governments, rather than event organizers.

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collection services, the collection service is delivered by a contractor and the collection contract term ends after May 2014.

- The term of the contract between MMBC and the local government will coincide with the expiry date of the contract between the local government and its collection contractor. During the term of this transition contract with the local government, MMBC will not qualify other multi-family building collectors to operate within the local government service area.
 - Alignment of contract expiry dates allows the local government to consider its options at the expiry of its collection contract. One of the options would be to implement an approach other than mandatory payment to confirm multi-family building participation before retendering the PPP multi-family building collection service and accepting the market-clearing price under a new contract with MMBC.
- Depot collection service
 - To be applied where a local government accepts the market-clearing price financial incentive to provide depot collection, the service is currently delivered by a contractor and the collection contract term ends after May 2014.
 - The term of the contract between MMBC and the local government will be aligned with the expiry date of the contract between the local government and its collection contractor.
 - Alignment of contract expiry dates allows the local government to consider its options at the expiry of its collection contract. One of the options would be to retender the depot collection service and continue to accept the market-clearing price under a new contract with MMBC.

Where local governments accept the market-clearing price financial incentive, a resident's contact for inquiries about collection services will be their local government. Where local governments decline the market-clearing price financial incentive, a resident's contact for inquiries about collection services will be MMBC.

Market-clearing prices are the prices at which the market will deliver the service required by MMBC. Setting appropriate market-clearing prices is important to drive effectiveness (i.e., collection of PPP), reward the efficient operator and encourage efficiency among other operators. 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.

The financial incentives offered to collectors will be determined by establishing market-clearing prices for the collection of PPP from single-family and multi-family households at curbside, from multi-family buildings, at depots and through streetscape collection systems. Establishing the market-clearing prices for collection has two components:

- **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 or at a flat rate

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per household serviced, or some combination. Market-clearing prices offered as incentives should drive behaviour to maximize PPP placed into the PPP collection stream rather than the garbage stream by all households serviced.

- **The price level or quantity of financial incentive:** The price level will be determined through research into collection service performance (i.e., kilograms collected per household) and service delivery costs across British Columbia. The results of this research will be used to inform a market-clearing price for each type of service for which a market-clearing price will be offered. The market-clearing price will take into account cost drivers and may vary should these cost drivers vary across BC. The market-clearing price will be set taking into consideration any additional requirements of collectors as a result of the PPP Stewardship Plan.

Market-clearing prices may be stratified to accommodate circumstances, such as fuel prices, that change over time. As well, market-clearing prices may be reviewed in relation to the changing characteristics of PPP being supplied by producers to residents²⁸. Setting market-clearing prices to drive collection activities is an iterative process that will be monitored and adjusted to reflect changing conditions.

4.5 Post-Collection

MMBC will contract directly for post-collection services which include all activities subsequent to the collection of PPP from BC residents through the collection channels described in Section 4.4. Post-collection activities include receiving PPP from collection vehicles, picking up PPP from depots, consolidation and transfer where required, handling and sorting PPP, preparing PPP for shipment to end-markets or downstream processors, marketing PPP to maximize commodity revenue, appropriately managing residual materials and reporting the quantities of material received and marketed and other metrics to MMBC as required.

Primary processors are considered to be the first receivers of collected PPP that market at least some types of processed PPP directly to end markets. Primary processors may engage sub-contractors to provide consolidation, transfer and transportation services to move PPP from the collection location to the processing facility. Primary processors may also engage secondary or downstream processors that can more efficiently or effectively sort, process and market some types of PPP.

MMBC will engage PPP primary processors on a contractual basis using the following process:

1. **Issue a Request for Expressions of Interest (REOI)** to PPP processors to gauge processors' capacity to receive, process and market a defined list of PPP received from collectors.

²⁸ Changes implemented by producers to the material utilized for packaging (e.g., plastic rather than glass) and/or to the design of a package or a printed paper product can increase the cubic volume of a tonne of PPP collected.

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2. **Issue a Request for Proposals (RFP)** to PPP processors that are able to manage the defined list of PPP.

Processors will be provided with the names and locations of qualified collectors participating in the MMBC program. This information will allow processors to consider PPP hand over arrangements with these qualified collectors as required in order to respond to the RFP.

The RFP will solicit information to allow MMBC to confirm a processor's ability to meet processor qualification standards set by MMBC. The RFP will also solicit bid prices for post-collection services, delivered in compliance with the processor qualification standards, including:

- Receiving PPP from vehicles operated by qualified collectors;
- Picking up PPP from depots operated by qualified collectors;
- Consolidating and transferring PPP from qualified collectors where required;
- Preparing PPP for shipment to end-markets or downstream processors;
- Marketing PPP to end-markets;
- Transferring PPP to downstream processors, as required;
- Appropriately managing residual materials;
- Tracking materials received and shipped by the processor and its downstream processors to final destination; and
- Reporting to MMBC as required.

Processors will be qualified based on compliance with the processor qualification 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. In assessing best value, MMBC will also consider the implications of processor and recycling-end market locations on its contract administration activities including, for example, audits and compliance.

In the contractual arrangement between MMBC and primary processors, primary processors will be tasked to find the "best" markets for materials (i.e., reliable markets that command the highest commodity prices) and the agreements will incorporate mechanisms to share market revenue and commodity risk. By building in opportunities for processors to benefit from maximizing commodity values, processors have a strong incentive to maximize both the amount of PPP marketed and its commodity value.

4.6 Relationship between Collectors and Processors

Collectors will have a contractual relationship with MMBC in order to receive the market-clearing price for the PPP collection services they provide to MMBC. The contract between MMBC and a collector will set out MMBC's requirements for delivery of PPP collection services including minimum service levels and maximum amounts of non-PPP items and types of PPP not targeted for collection in the collected PPP.

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MMBC will select post-collection service providers for all collected tonnes and will inform each collector which post-collector will manage their collected PPP. Processors will have a contractual relationship with MMBC in order to receive payment for the post-collection services they provide to MMBC. The contract between MMBC and a processor will set out MMBC's requirements for delivery of PPP post-collection services including requirements to receive PPP from collectors and minimum processing system efficiencies.

Collectors and processors may establish arrangements for the handover of PPP from the collector to the processor. These arrangements could be made on a prospective basis between a collector and each of several processors during the post-collection RFP process or, following the RFP process, between a collector and the processor selected by MMBC. If the former, the arrangements would take effect only where the processor is selected by MMBC to provide post-collection services for the PPP collected by the collector. These arrangements could include logistics associated with the handover of PPP from the collector to the processor or supplementary provisions related to material quality beyond those specified in MMBC's contracts. The need for and form of any such arrangements are at the discretion of collectors and processors.

Certain circumstances associated with post-collection services may warrant arrangements between collectors and processors. Examples of these circumstances include:

- If the collector owns a transfer facility and the processor wants to use the facility as part of the processor's bid submission to MMBC for post-collection services;
- If the collector owns vehicles for transporting PPP from a depot to a consolidation point or transfer facility or from the consolidation or transfer facility to a MRF and the processor wants to use the collector's transport services as part of the processor's bid submission to MMBC for post-collection services; and/or
- If the collector is collecting ICI PPP together with residential PPP.

4.7 Collector and Processor Qualification Standards

Collector and processor qualification standards, including reporting protocols, are the minimum operating standards that a service provider must meet on a continuous basis in order to be eligible to provide collection, depot operation and/or processing services under a contract with MMBC.

Qualification standards will be used by MMBC to support the continued growth of a safe, stable and sustainable PPP collection and processing system across British Columbia. MMBC will incorporate qualification standards into the request for proposals (RFP) for post-collection services and into contracts with collectors and processors.

Qualification standards²⁹ will set out basic requirements, such as free collection service to residents, proof of all necessary licenses and permits, compliance with health and safety

²⁹ Qualification standards for collectors and processors will be subject to consultation following submission of the PPP Stewardship Plan.

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requirements and specified liability and business insurance coverage. Qualification standards will also include reporting requirements to allow MMBC to meet its reporting requirements to the MOE.

Collectors will be required to report data such as:

- Number of single-family and multi-family households served with curbside collection;
- Number of multi-family buildings and households served with multi-family building collection;
- Number of single-family and multi-family households served by depot collection;
- Number of streetscape collection locations;
- Tonnes of PPP collected through curbside, multi-family building, depot and streetscape collection; and
- Tonnes of PPP delivered to each processor under contract to MMBC.

Processors will be required to report data such as:

- Tonnes of PPP received from each collector under contract to MMBC and, of this amount, tonnes of PPP delivered to downstream processors and recycling end-markets by material type;
- Names and locations of recycling end-markets receiving PPP from the primary processor and downstream processors;
- Revenues received for PPP materials marketed;
- Processing residue rates; and
- Names and locations of recovery end-markets and disposal locations.

4.8 Dispute Resolution

MMBC will seek to balance the principles of access, efficiency, fairness and equitable outcomes in the design of its dispute resolution mechanisms. Dispute resolution processes will be tailored to the nature of disputes as well as the likely parties to a typical dispute. The objectives of the dispute resolution process are to manage disputes to resolution rather than adjudication, earlier and faster and at a reduced cost to all parties involved.

The following suite of alternative dispute resolution processes will be used:

Dispute Type	Path of Escalation/Resolution
Residents	<ul style="list-style-type: none">• Discussion with MMBC management• If unresolved, involvement of MMBC Board

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Dispute Type	Path of Escalation/Resolution
Collectors and processors	<ul style="list-style-type: none"> • Discussion with MMBC senior management • Facilitation: to prevent escalation and to explore interests/remedies • Mediation: to be used if facilitation is unsuccessful process to be specified in commercial agreements regarding selection of mediator, roles of parties, time and place of mediation, conduct of mediation, length, responsibility for fees/costs, confidentiality, conclusion of mediation by agreed settlement or final settlement proposal by the mediator • Arbitration: to be used if mediation is unsuccessful; process to be specified in commercial agreements regarding notice of arbitration, submission of written statements, place and conduct of meetings and hearings, the process for rendering and delivering decisions; jurisdiction and powers of the arbitrator, allocation of costs/fees; application of the B.C. Arbitration Act (RSBC 1996)

4.9 Communications

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:

- Make residents and other target audiences aware of the program features and benefits through communication activities; and
- Employ promotion and education (P&E) activities to engage and encourage residents to make informed and proper decisions concerning the preparation and management of PPP for collection and recycling.

The design of the PPP stewardship communication activities will be set out in a strategic communication and P&E plan that will be developed following approval of the stewardship plan. The communication and P&E plan will comprise three activity phases: pre-launch, launch and post-launch.

The principles guiding the development of the communication and P&E plan will be:

- **Understand MMBC’s resident and stakeholder audiences** – 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;
- **Design effective communication and P&E** – ensure that communication strategies, images, messages and tools reflect needs, are clearly understood, overcome perceptual and real barriers, contain a call to action and motivate appropriate behaviour;

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- **Collaboration** – explore opportunities to collaborate with other BC stewardship agencies, local governments, retailers, community-based organizations and others to develop strategies and distribute P&E materials that strive to inform and motivate;
- **Establish measurement metrics** – establish a benchmark measurement of program awareness, perceptions and reported behaviour against which to track and assess changes pertaining to year-over-year performance;
- **Deploy an effective mix of communication and P&E tactics** – develop and disseminate a strategic mix of tactics that ensure residents and stakeholders are effectively exposed to primary and supportive messaging; to undertake this in cooperation with local governments and others who have developed and operate successful, mature recycling programs; and
- **Engage audiences to elicit feedback** – employ contemporary methods of communication interaction (e.g., social media) as well as traditional methods to engage residents and encourage them to provide direct feedback regarding program changes and to ask questions.

The communications plan will be evaluated periodically using various key performance metrics such as its effectiveness in developing consumer awareness and delivering clear, comprehensible P&E messages across geographical and cultural demographics. The communications plan will be updated and enhanced as required.

To assist in the evaluation of communications activities, MMBC will conduct research by 2015 to establish a resident awareness benchmark by 2016 and a resident awareness target by 2017.

4.10 Administration of the Packaging and Printed Paper Stewardship Plan

MMBC is responsible for implementing this PPP Stewardship Plan on behalf of the producers that have chosen to be members.

MMBC will administer the implementation of the PPP Stewardship Plan effectively and efficiently through a combination of in-house and outsourcing of key specialized functions or services. 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 by the best practices already incorporated by the service provider that would otherwise be a multi-year continuous improvement effort for MMBC.

MMBC will directly administer collection and processing services including dispute resolution, communications to BC residents and performance reporting to the BC Ministry of Environment (MOE).

MMBC will outsource producer registration, reporting, fee invoicing, payments, audits and compliance in order to facilitate harmonized systems for Canadian producers, whether operating only in BC or in other Canadian provinces.

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4.11 Program Financing

MMBC is responsible to the producers that have chosen to be its members to deliver an efficient and effective PPP stewardship program.

Producers that choose to be members of MMBC are responsible to pay fees that are sufficient, in aggregate, to implement the PPP Stewardship Plan. These costs fall into three categories:

- Administration - what it takes to manage the business;
- Resident awareness - what it takes to promote the behaviours that drive collection; and
- Material management - what it takes to manage materials.

Producers that supply types of PPP that are currently recyclable and that will be included in the PPP Stewardship Plan collection system will pay fees that are intended to cover:

- An equitable share of MMBC administration costs;
- An equitable share of resident awareness costs; and
- A contribution to the costs to manage the recyclable PPP that is the basis for the PPP stewardship program performance.

Producers that supply types of PPP that are currently not recyclable and will not be included in the PPP Stewardship Plan collection system when the program launches in May 2014 will pay fees that are intended to cover:

- An equitable share of MMBC administration costs;
- An equitable share of resident awareness costs;
- A contribution to the costs to manage the recyclable PPP that is the basis for the PPP stewardship program performance; and
- Research and development to resolve technical and market capacity barriers so that the PPP that is currently not recyclable can be included in the collection system over time.

It is anticipated that producers that choose to be members of MMBC will not apply a fee at the point of sale of products in packaging and printed paper, primarily due to the relatively low cost per unit of packaging and printed paper that, for many products, is less than one cent. In the absence of a fee at the point of sale, costs incurred by producers to meet their obligations under the Recycling Regulation through membership in MMBC would be considered a cost of doing business in BC and would be managed by the producer accordingly. 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.

Costs incurred by MMBC to deliver and administer the PPP Stewardship Plan will be allocated among producers based on the following principles:

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- **Encourage reduction, redesign and recyclability** - 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;
- **Program delivery costs, subject to the principle above** - Allocation of costs to producers that supplied the PPP for which costs were incurred; Where costs are incurred for commingled materials, allocation of costs to each category of PPP reported by producers using a cost allocation model³⁰ informed by composition audits, cost allocation studies and other analyses to identify the relative cost share for each category of PPP; and
- **Administration costs** - Equitable sharing of administration costs and common costs by all producers.

5. Program Performance

5.1 Recovery Target

MMBC's aspiration is to have all PPP supplied into BC households effectively collected and recycled.

Achieving this outcome will involve a number of steps of which the first will be to expand the existing collection system to accommodate a uniform province-wide list of PPP materials. This list will be predicated on the existence of recycling end-markets for each material on the list. Collecting in all areas of the province the full range of PPP for which there are existing markets will require adjustments to the majority of collection programs³¹ and by the primary and downstream processors that receive the collected material. It will also require effort to ensure that the additional PPP is effectively marketed with minimal disruption to local commodity market arrangements.

Subsequently, the uniform list of materials will be expanded incrementally over time to ensure collection, processing and marketing of additional materials will not compromise the operation and reliability of the existing collection and recycling system, the quality of materials shipped to end-markets, the viability of these end-markets, the confidence of residents in their recycling program and the environmental performance of the system.

³⁰ The cost allocation model is subject to modification over time consistent with the principles of continuous improvement.

³¹ Approximately 30% of single-family households and less than 15% of multi-family households are currently receiving collection of all rigid plastics.

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The benefits of this incremental approach to expand the scope of collected materials include:

- It builds on the existing recycling collection and processing system in a logical, environmentally and economically prudent manner;
- It protects the environmental performance of the existing recycling system by ensuring the addition of materials to the list is preceded by requisite investments and operational changes to deliver best use of materials and no degradation to the collection and recycling of materials already on the list; and
- It upholds the pollution prevention hierarchy by ensuring the PPP program focuses on recycling outcomes.

Barriers to recycling some types of PPP have prevented local governments from including these items in their existing PPP collection programs. MMBC is able to co-ordinate efforts to address these barriers, in collaboration with producers and other provincial PPP producer responsibility agencies. In order to expand the list of PPP incrementally to include all PPP, MMBC will undertake research into each type of unrecyclable PPP to identify and resolve the issues that compromise the existing PPP system. A research and development (R&D) work plan will be implemented to explore options to remove the barriers by:

- Working with producers to modify the design of the unrecyclable PPP;
- Working with post-collection service providers to modify processing equipment and/or sorting systems to effectively segregate the unrecyclable PPP so that the quality of the remaining PPP is not compromised;
- Working with end-markets to adjust material specifications so that the unrecyclable PPP can be marketed with other PPP; and/or
- Working with end-markets to develop new end-uses so that the PPP that is currently unrecyclable can be marketed.

All PPP supplied into BC households is addressed in the PPP Stewardship Plan through a combination of the research and development activities described above and the collection services described in Section 5.2. Based on available composition data of PPP collected and the garbage stream, it is estimated that, by weight, approximately 97% of the PPP supplied into BC households is targeted for collection and approximately 3% will be the focus of research and development activities. MMBC's goal is to collect all packaging types by 2017 and manage the collected PPP according to the pollution prevention hierarchy including shifting as much of the currently unrecyclable PPP from disposal or recovery up the hierarchy into recycling as possible.

The Recycling Regulation specifies that the PPP stewardship program must achieve, or is capable of achieving within a reasonable time, a 75% recovery rate.

The recovery rate is calculated by dividing the quantity of PPP recovered by the quantity of PPP generated by residents and available for collection. The numerator is based on the quantity of PPP shipped to recycling end-markets and the quantity of system processing residues shipped

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to recovery end-markets³² as reported by primary processors and verified by MMBC. The denominator³³ is based on the quantity of PPP supplied to residents as reported by producers³⁴ and verified by MMBC.

Based on surveys carried out in late 2011³⁵, it is estimated that approximately 200,000 tonnes of residential PPP were being recycled annually in BC. These 200,000 tonnes represent the numerator for purposes of calculating a baseline PPP recovery rate.

The quantity of PPP supplied to BC households cannot be accurately quantified until producers report to MMBC. In the absence of data on the quantity of PPP supplied by producers to BC residents, MMBC developed an estimate of 350,000 to 400,000 tonnes utilizing quantities supplied in other provincial producer responsibility programs cross-referenced with PPP composition data. These 350,000 to 400,000 tonnes have been used to calculate an estimated baseline PPP recovery rate between 50% and 57%.

To put BC's baseline residential recycling rate into context, both Quebec's PPP stewardship program (established in 2005) and Ontario's PPP stewardship program (established in 2004) are recycling 65% of the province's residential PPP. European stewardship programs³⁶ are recycling various amounts of the residential materials targeted in the program: France is recycling 63%³⁷; Germany is recycling 71%³⁸; and Belgium is recycling 93%³⁹.

Building on the PPP collection and recycling systems already in place, producers will be required to increase the recovery rate from BC's baseline recycling rate to the 75% target recovery rate. This additional recovery will involve:

- Delivering more collection services;
- Increasing participation by encouraging residents to utilize available collection systems;
- Collaborating with provincial and local governments to implement policies that support PPP collection, such as limits on the quantity of garbage that can be set out for collection, reducing the frequency of garbage collection, charging fees for garbage collection and/or banning PPP from disposal;
- Resolving technical and convenience barriers in multi-family collection systems;

³² In compliance with the pollution prevention hierarchy.

³³ Should a local government that is currently providing collection of PPP decline the market-clearing price and indicate that it wishes to continue to provide the PPP collection service, the quantity of PPP supplied to the local government's residents will be deducted from total PPP supplied by producers (using average kilograms per capita) to ensure that the PPP supplied in the denominator of the recovery rate calculation reflects the areas from which PPP in the numerator is collected.

³⁴ Adjusted as required to reflect PPP that is retained by residents for extended periods of times (e.g., magazines) as determined from composition audits of PPP collected.

³⁵ Refer to the report titled the *Current System for Managing Residential Packaging and Printed Paper in BC*, March 2012.

³⁶ Refer to report titled *Packaging and Printed Paper Stewardship Program Design Options*, March 2012: Section 4.2.1.

³⁷ Of glass, paper, steel, aluminum and plastic packaging.

³⁸ Of paper and packaging made of paper, plastics, metals and glass.

³⁹ Of glass, paper, steel and aluminum packaging and plastic bottles.

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- Increasing capture rates by encouraging residents to place PPP in the PPP collection system rather than the garbage collection system;
- Increasing the effectiveness of collection systems to deliver materials that meet the quality requirements of recycling end-markets;
- Increasing the effectiveness of processing systems to reduce processing residues and increase the proportion of collected PPP delivered to end-markets; and
- Developing new end-markets and processing capability and capacity to support the addition of more types of PPP to the collection system.

The PPP Stewardship Plan will be implemented with the objective of increasing PPP directed to recycling, reducing PPP directed to disposal and, overall, improving the environmental performance of the PPP collection and processing system. Collection and processing systems may be modified where the adjustments represent an opportunity to manage materials at a higher level of the pollution prevention hierarchy.

Getting to 75% Recovery

MMBC is committed to building the residential PPP collection and recycling system in BC to target all types of PPP for collection and deliver the required 75% recovery target within a reasonable time and within the framework of the pollution prevention hierarchy.

To estimate the time required to achieve a 75% recovery target, MMBC requires:

- Information from collectors on the time required to modify their collection systems to accept a broader range of PPP and their interest and ability to expand service areas;
- Information from processors on the time required to modify their processing systems to accept a broader range of PPP and larger quantities of PPP;
- Information from recycling end-markets on their ability to manage larger quantities of PPP and their interest and ability to accept new types of PPP; and
- Accurate information from producers on the quantity of PPP being supplied to BC residents.

MMBC will be able to assess the ability of collectors and processors to manage larger quantities of PPP following the market-clearing price offers for collection services and the RFP for post-collection services.

In order to assess the ability of recycling end-markets to manage larger quantities of PPP, MMBC first requires information on the destination of marketed PPP reported by primary processors following program implementation. With this information, MMBC can work collaboratively with these recycling end-markets to assess their capability to manage larger quantities of PPP and to accept new types of PPP.

In order to develop accurate information on the quantity of PPP being supplied to BC residents, producers must determine:

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- Which of their products are packaged in packaging that meets MMBC's definition of packaging and is supplied to BC residents;
- The quantity of each of these products actually supplied to BC residents, which is likely a subset of products shipped to distribution centres that service BC and then a subset of products distributed within BC;
- The types of materials used to package each of these products⁴⁰;
- The weight of each of the materials used to package each product;
- Which of the types of printed paper used in their business that meets MMBC's definition of packaging used in their business and is supplied to BC residents; and
- The quantity of each of these types of printed paper supplied to BC residents which is likely a subset of products shipped to distribution centres that service BC.

MMBC will be responsible for ensuring that data reported by producers are accurate through validation procedures and periodic auditing. Experience with other Canadian producer responsibility programs suggests that a minimum of three annual reporting cycles is required to develop confidence in the integrity and accuracy of producer reporting systems.

After the first three years of program implementation, MMBC will have:

- Sufficient operating experience to reasonably assess the period of time required by its contracted collectors and processors and by the recycling end-markets utilized by its contracted processors to modify and/or expand their operations in order to manage the quantity of PPP that would be collected at a 75% recovery target; and
- Reasonable confidence in the quantity of PPP supplied to BC residents reported by producers as confirmed by its validation and auditing procedures.

Within six months following the first three years of program implementation, MMBC will develop an estimate of the timeline required to achieve the 75% recovery rate in consultation with its producers, collectors, processors, recycling end-markets and other interested stakeholders.

In the interim, MMBC will work to deliver a PPP program by 2015⁴¹ that maintains, at a minimum, the overall provincial collection rate of 208,700 tonnes as assessed during preparation of the report titled *Current System for Managing Residential Packaging and Printed Paper* (March 2012) subject to adjustments to correct any errors in the Phase 1 survey data identified during program implementation and to reflect any significant changes in the quantity of PPP available for collection⁴².

⁴⁰ Some products are packaged in multiple types of materials e.g., a boxboard box that contains a container and cap of HDPE with a foil closure below the cap and with product instructions on printed paper.

⁴¹ First full year of operation.

⁴² For example, declining quantity of newspapers supplied to BC residents as a result of the trend to online sources of information.

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5.2 Accessibility

Section 5(1)(c) of the Recycling Regulation requires that a stewardship plan provide reasonable and free access to collection facilities. MMBC will provide reasonable access to collection services for PPP taking into consideration the need for:

- Services in large, urban areas as well as remote, sparsely populated areas;
- Effective and efficient collection services within their geographic and/or demographic context;
- A collection system with sufficient capacity to achieve the recovery target; and
- Predictability for residents wishing to recycle PPP.

As stated in Section 4.2 Packaging and Printed Paper Program Delivery Principles, MMBC's overarching objective is to provide continuous improvement in recovery effectiveness and efficiency without undermining existing PPP recovery efforts in British Columbia.

Access by householders to various types of services currently differs across BC communities, reflecting population density, local government service decisions and other factors. Appendix B sets out current single-family and multi-family collection service levels. It is MMBC's objective to maintain, at a minimum, the single-family and multi-family household service levels, where these households currently receive PPP collection, across Regional Districts as outlined in Appendix B.

MMBC is proposing to offer financial incentives to collectors to provide PPP collection services:

- To residents currently receiving curbside collection of PPP or curbside collection of garbage where the service is provided by a local government (referred to as 'curbside collection service');
- To residents currently delivering PPP to a central storage area accessible by all residents of a multi-family complex⁴³ with PPP collection from this central storage area (referred to as 'multi-family building collection service');
- To residents currently delivering PPP to drop-off depots (referred to as 'access to depots'); and
- In urban commercial areas with business activities that generate large amounts of PPP within municipalities with a population of 20,000 or more and a population density of 200 or more people per square kilometre where the local government operates a litter collection system (referred to as 'streetscape collection service')⁴⁴.

⁴³ Excluding single-family dwellings with suites and/or laneway houses and converted single-family dwellings, duplexes, triplexes and fourplexes.

⁴⁴ Subject to proof of concept through testing effective delivery of streetscape collection systems.

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Curbside Collection Service

MMBC will deliver PPP curbside collection service by:

- Contracting with local governments that accept the market-clearing price financial incentive to continue to provide PPP curbside collection; and
- Where a local government declines the market-clearing price financial incentive, contracting with a private company selected through a competitive procurement process.

Should a local government that currently provides curbside collection of PPP decline the market-clearing price and indicate that it wishes to continue to provide the PPP collection service, MMBC will not implement a competitive procurement process and will not provide curbside collection in the jurisdiction. In this circumstance, MMBC will not be responsible for providing reasonable access to curbside collection of PPP within the jurisdiction.

Should a local government that currently provides curbside collection of garbage decline the market-clearing price and indicate that it prefers depot collection over curbside collection, MMBC will consider this preference and may not proceed to implement a competitive procurement process to introduce a new PPP curbside collection service in the jurisdiction. If the local government declines the market-clearing price without indicating a preference for depot collection, MMBC will implement a competitive procurement process to select a contractor to deliver PPP curbside collection. If the bid price is higher than the market-clearing price, MMBC may elect to provide access to depots rather than introduce a new PPP curbside collection service in the jurisdiction.

Multi-family Building Collection Service

MMBC will deliver PPP multi-family building collection services by contracting with local governments and private companies that accept the market-clearing price financial incentive to deliver multi-family building collection services.

Should a local government that currently provides collection of PPP from multi-family buildings decline the market-clearing price and indicate that it wishes to continue to provide the PPP collection service, MMBC will not be responsible for providing reasonable access to collection of PPP to multi-family buildings serviced by the local government.

A financial incentive is being utilized to provide opportunity for those providing collection of PPP from multi-family buildings today to be part of the PPP collection system when producers assume responsibility for the PPP recovery system in May 2014. The service level delivered under the PPP Stewardship Plan is linked to the service delivered by local governments and private companies that accept the market-clearing price financial incentive and contract with MMBC. MMBC will track the number of multi-family households receiving PPP collection services under the PPP Stewardship Plan. Should the number of multi-family households deviate by more than 10% from the number of multi-family households currently receiving

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service⁴⁵, the value of the market-clearing price will be adjusted to encourage additional collection activity in underserved areas.

Access to Depots

MMBC will provide access to depots by contracting with private companies, local governments and/or not-for-profit organizations that accept the market-clearing price financial incentive to operate depots that accept PPP from residents.

A financial incentive is being utilized to provide opportunity for those operating PPP depots today to be part of the PPP collection system when producers assume responsibility for the PPP recovery system in May 2014. The service level delivered under the PPP Stewardship Plan is linked to the service delivered by local governments, private companies and not-for-profit organizations that accept the market-clearing price financial incentive and contract with MMBC. MMBC will track the number of households without access to curbside or multi-family collection services that have access to a PPP depot under the PPP Stewardship Plan. Should the level of access be below the Stewardship Agencies of British Columbia's (SABC) depot service delivery standard, the value of the market-clearing price will be adjusted to encourage additional depot collection activity in underserved areas.

Streetscape Collection Service

MMBC will deliver PPP streetscape collection service by:

- Contracting with local governments that accept the market-clearing price financial incentive to provide PPP streetscape collection; and
- Where a local government declines the market-clearing price financial incentive, contracting with a private company selected through a competitive procurement process.

Should a local government decline the market-clearing price and indicate it does not wish to provide garbage streetscape collection service⁴⁶, MMBC will not implement a competitive procurement process and will not provide streetscape collection in the jurisdiction.

Prior to implementing streetscape collection service in areas that meet the criteria, MMBC will undertake composition audits of PPP and garbage in existing streetscape collection programs and conduct strategic pilot projects in order to develop a preferred approach to streetscape collection services. MMBC will review data from the pilot projects with stakeholders and will consult with stakeholders on its preferred approach to streetscape collection services when available

⁴⁵ As shown in Appendix B, subject to data adjustments to align housing categories with the definitions of curbside and multi-family buildings as used in the PPP Stewardship Plan.

⁴⁶ The provision of a streetscape garbage collection service is critical to the operation of a streetscape PPP collection service.

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5.3 Product Life Cycle Management

Section 5(1)(c)(vii) of the Recycling Regulation requires that a stewardship plan adequately provide for eliminating or reducing the environmental impacts of a product throughout the product's life cycle.

The producers that are members of MMBC will contribute to eliminating or reducing the environmental impacts of packaging or printed paper through innovations that affect the stages of its life cycle **before** it reaches the consumer. The following are examples of activities that have been implemented.

Reduction

- A number of brands, primarily in the home and personal care category, have created refill packs designed to make it very simple for the consumer to refill the original pack with new product. The refill pack is manufactured of a lightweight material producing less waste. This approach addresses the first R in the 3Rs hierarchy by reducing packaging, in some cases, by over 75%.
- Packaging can be reduced through the reformulation of a product, such as concentration, requiring less packaging per use of product. This has been done extensively in the laundry, home care and personal care product categories.

Redesign

- Plastic packaging can be created with new technology that delivers the same strength and performance but requires less resin. This can be achieved through the use of “micro-bubbles” incorporated into the plastic. This reduces the density of the resin but does not impact performance – an approach to packaging reduction that is often invisible to the consumer.
- Research and development is also being directed at incorporating other materials into product packaging – primarily replacing plastic resin with renewable materials. To minimize plastic use, the redesigned package incorporates fibres such as bamboo, sugarcane and bulrush. Research and market testing has shown that incorporation of these different materials delivers packaging that stays strong under compression and consumer use (opening and closing) and transportation. In some cases the bamboo sugarcane and/ or bulrush has replaced the use of polyvinyl chloride, which is a contaminant if mixed with other types of plastic.
- Several non-food manufacturers have invested in research and development allowing them to utilize 100% post-consumer recycled resin in their plastic packaging.
- Companies are making commitments to sustainable sourcing of their paper-based packaging. Some companies have committed to purchasing only Forest Stewardship Council certified paper. Others are committing to source paper products only from

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managed forests and are involved in the replanting of those forests to ensure ongoing regeneration.

The producers that are members of MMBC will contribute to eliminating or reducing the environmental impacts of packaging or printed paper through innovations that affect the stages of its life cycle *after* it reaches the consumer. The following are examples of activities that have been implemented.

Recyclability

- Companies are redesigning packaging so that it is more easily recycled by, for example: harmonizing the plastic resin of a cap with its bottle; providing a removable barrier between the packaging and the product to reduce contamination; or, in the case of paperboard packaging, reducing or removing a coating from the carton making it more easily recyclable.
- Companies are redesigning packaging and closures to allow consumers to get every last drop of the product out of the package. This provides better value to the consumer and results in less contamination in the recycling system.

Implementation of the PPP Stewardship Plan will manage PPP after a resident has placed it into the PPP collection system through recycling, and where recycling options are not available, through recovery or disposal.

MMBC, through implementation of the PPP Stewardship Plan, and the PPP producers that are its members will continue to strive to eliminate or reduce the environmental impacts of PPP supplied to residents in BC throughout the products' life cycle. Information on PPP end-of-life management compiled by MMBC during implementation of the PPP Stewardship Plan will be an additional source of information 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.

5.4 Pollution Prevention Hierarchy

Section 5(1)(c)(viii) of the Recycling Regulation requires that a stewardship plan adequately provide for the management of the product in adherence to the order of preference in the pollution prevention hierarchy.

The PPP Stewardship Plan will adhere to the pollution prevention hierarchy through the following activities:

Pollution Prevention Hierarchy	Activity
Reduce the environmental impact of producing the product by eliminating	<ul style="list-style-type: none">• Initiatives undertaken by individual producers• PPP Stewardship Plan encourages reduction

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Pollution Prevention Hierarchy	Activity
toxic components and increasing energy and resource efficiency	through cost allocation which rewards companies which reduce the weight of PPP sold into the market
Redesign the product to improve reusability or recyclability	<ul style="list-style-type: none"> • Initiatives undertaken by individual producers • PPP Stewardship Plan encourages redesign through cost allocation • MMBC will provide guidance to producers on design for recyclability
Eliminate or reduce the generation of unused portions of a product that is consumable	<ul style="list-style-type: none"> • Not applicable as packaging and printed paper are not consumable
Reuse the product	<ul style="list-style-type: none"> • Initiatives undertaken by individual producers • PPP Stewardship Plan encourages reuse through cost allocation
Recycle the product	<ul style="list-style-type: none"> • PPP Stewardship Plan utilizes payments to service providers to encourage collection of PPP and processing of PPP to meet recycling end-market requirements • MMBC will provide guidance to producers on design for recyclability
Recover material or energy from the product	<ul style="list-style-type: none"> • 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
Otherwise dispose of the waste from the product in compliance with the Act	<ul style="list-style-type: none"> • Primary and downstream processors will be required to manage residue in compliance with the Act

5.5 Reporting

During implementation of the PPP Stewardship Plan, MMBC will compile data in order to report on the following indicators:

- **Accessibility indicators** to describe access to PPP collection services in the province of BC such as:
 - Single-family and multi-family households receiving household collection service;
 - Number and location of depots accepting PPP;
- **Operational effectiveness indicators** characterizing program performance such as:

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- Tonnes of PPP collected within each regional district;
- Kilograms per capita of PPP collected within each regional district;
- Tonnes of PPP recycled and recovered for the province;
- Kilograms per capita of PPP recycled and recovered for the province;
- Recovery rate expressed as a percentage for the province;
- **Management of collected PPP in relation to the pollution prevention hierarchy**
 - Tonnes of PPP managed by recycling;
 - Tonnes of PPP managed by recovery;
 - Tonnes of PPP managed by disposal;
- **Operational efficiency indicators** reflecting program performance in financial terms such as:
 - Total program cost per tonne recovered;
 - Total program cost per household;
- **Environmental impact measures** to characterize actions intended to reduce the environmental impacts of packaging and printed paper by producers who are members of MMBC and by MMBC; and
- **Resident awareness indicators** to assess public awareness and engagement such as:
 - Percentage of residents aware of PPP stewardship program;
 - Percentage of residents reporting use of available collection services; and
 - Visits to the 'resident' section of MMBC website.

In addition to compiling data for the indicators listed above during implementation of the PPP Stewardship Plan, MMBC will undertake the necessary research and develop, by 2016, a data tracking and modelling system for greenhouse gas emissions (GHG). In 2017, following development of the model, MMBC will modify collector and post-collector service provider contracts to include reporting of the necessary data and will provide training and support for its contractors as they develop their own tracking systems. MMBC will begin to compile GHG data from its contractors in 2018 with the full data tracking system functional by 2019 and GHG performance reported in 2020.

MMBC will report on the performance of the PPP program in an annual report submitted to the BC MOE and posted on its website by July 1st each year. MMBC will include a reasonable assurance opinion of the accessibility indicators and operational effectiveness indicators by a third-party in its annual report.

In January 2015, as part of its first year of operation, MMBC will provide a summary of collection services as of December 2014. The summary of collection services will describe:

- Local governments that accepted the market-clearing price financial incentive for curbside collection service and the households being serviced through agreements between MMBC and these local governments;
- Local governments that declined the market-clearing price for curbside collection service and the households for which MMBC is directly providing curbside collection service;

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- Multi-family buildings being provided with PPP collection services by collectors under contract to MMBC; and
- Drop-off depots accepting PPP operated by collectors under contract to MMBC.

The MOE requires that a stewardship agency provide third-party audited financial statements prepared in accordance with generally accepted auditing standards if fees are applied at the point of sale to fund the stewardship plan. It is anticipated that producers that choose to be members of MMBC will not apply a fee at the point of sale of products in packaging and printed paper. 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.

6. Consultation

The following were considered stakeholders for purposes of consultation during development of the PPP Stewardship Plan:

- 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.

MMBC used a combination of mechanisms to consult with stakeholders during development of the PPP Stewardship Plan.

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 met 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 approaches to the PPP Stewardship Plan.

MMBC 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.

Packaging and Printed Paper Stewardship Plan

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.

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 a Consultation Summary⁴⁷ together with responses from MMBC describing if and how the comments were addressed in the PPP Stewardship Plan when submitted to the Ministry of the Environment on November 19, 2012.

MMBC continued to receive comments on the PPP Stewardship Plan until December 14, 2012. Comments received by December 14, 2012 are included in the Consultation Summary together with responses from MMBC describing if and how the comments were addressed in the updated PPP Stewardship Plan when submitted to the Ministry of the Environment on February 25, 2013.

MMBC has worked diligently to consult with stakeholders during development of the PPP Stewardship Plan and will continue to dialogue with stakeholders during implementation of the plan. MMBC is providing the following opportunities for stakeholder dialogue:

- On January 18, 2013, MMBC released a request for expressions of interest for post-collection services with a submission date of March 1, 2013;
- On January 18, 2013, MMBC released a draft updated list of PPP to be collected and solicited stakeholder comments by March 1, 2013;
- A workshop with webcast on March 5, 2013 in Richmond BC and a second workshop (without webcast) in Toronto, Ontario on March 7, 2013 for PPP producers to review categories for producer reporting, outline potential approaches to setting fees and considerations for establishing a de minimis policy and general content and timing of producer contracts;
- Following plan approval, MMBC is planning to host a workshop to review:
 - PPP collection services including:
 - Scope of curbside, multi-family building and depot collection services,
 - Collector interface with post-collection service providers,
 - Reporting procedures,
 - Market-clearing price financial incentives, and
 - The collector agreement including invoicing procedures.

MMBC will post future opportunities for stakeholder dialogue on its website.

⁴⁷ The Consultation Summary is provided in Appendix C.

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Appendix A – Glossary

Collector

Entity providing services for collection of PPP from households or from streetscapes under contract with MMBC.

Depot

Facility where residents can drop off PPP under contract to MMBC.

Market Clearing Price

Payment available to collection service providers (subject to executing an agreement to provide the collection service, comply with the collector qualification standard on a continuous basis, report specified data on a defined schedule) designed to stimulate collection activities and act as a market clearing mechanism.

ICI

Industrial, commercial and institutional.

Processing

Manual or mechanical sorting and quality control of PPP for the purpose of shipping to recycling end-markets.

Primary Processor

First receivers of collected PPP that market at least some types of processed PPP directly to end markets. Primary processors may engage downstream processors that can more efficiently or effectively sort, process and market some types of PPP.

Qualification Standard

Minimum operating standard that a service provider must meet on a continuous basis in order to be eligible to provide collection, depot operation and/or processing services under a contract with MMBC.

Recovery Rate

Calculated as a percentage with the numerator representing the quantity of PPP collected and the denominator representing the quantity of PPP available for collection.

$$\text{Recovery Rate \%} = \frac{\text{Collected}}{\text{Available for Collection}} \times 100$$

Service Provider

Entity that collects PPP from single-family or multi-family households or streetscapes, operates a depot or provide post-collection services under contract with MMBC.

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Appendix B – Single-Family and Multi-Family Collection Services

Regional District	Single-Family Households			Multi-Family Households	
	# of Single-Family Households	# of Single-Family Households Receiving PPP Curbside Collection Service ^{48 49}	# of Households Receiving Garbage Curbside Collection Service (no PPP curbside collection) ⁵⁰	# of Multi-Family Households	# of Multi-Family Households Receiving PPP Collection Service ^{51 52}
Alberni Clayoquot RD	10,720	8,999	0	1,454	0
Bulkley-Nechako RD	13,561	450	7,252	989	0
Capital RD	129,653	118,051	0	47,700	41,533
Cariboo RD	23,484	2,450	5,157	1,741	1,000
Central Coast RD	1,170	0	0	15	0
Central Kootenay RD	23,992	9,427	3,690	1,778	0

⁴⁸ Source: *Current System for Managing Residential Packaging and Printed Paper in BC*, March 2012, Appendix C. The categories used in the Current System Report were 'single-family' and 'multi-family'. Depending on how individual local governments categorize housing types, the data may have been inconsistently reported. Under the PPP Stewardship Plan, the categories will be 'curbside' and 'multi-family buildings'. These categories may differ from the categories used by local governments in reporting the data presented in the table above.

⁴⁹ These single-family households will receive curbside collection of PPP under the PPP Stewardship Plan with the exception of any households where a local government that currently provides curbside collection of PPP declines the market-clearing price and indicates that it wishes to continue to provide the PPP collection service. In this circumstance, MMBC will not be responsible for providing reasonable access to curbside collection of PPP within the jurisdiction.

⁵⁰ These single-family households will receive curbside collection of PPP under the PPP Stewardship Plan with the exception of any households where a local government that currently provides curbside collection of garbage declines the market-clearing price and indicates that it prefers depot collection over curbside collection or where a local government declines the market-clearing price without indicating a preference for depot collection and the bid price received by MMBC is higher than the market-clearing price.

⁵¹ Source: *Current System for Managing Residential Packaging and Printed Paper in BC*, March 2012, Appendix C. The categories used in the Current System Report were 'single-family' and 'multi-family'. Depending on how individual local governments categorize housing types, the data may have been inconsistently reported. Under the PPP Stewardship Plan, the categories will be 'curbside' and 'multi-family buildings'. These categories may differ from the categories used by local governments in reporting the data presented in the table above.

⁵² These multi-family households will receive collection of PPP under the PPP Stewardship Plan with the exception of any households where a local government that currently provides collection of PPP declines the market-clearing price and indicates that it wishes to continue to provide the PPP collection service. In this circumstance, MMBC will not be responsible for providing reasonable access to collection of PPP to multi-family residents serviced by the local government.

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Regional District	Single-Family Households			Multi-Family Households	
	# of Single-Family Households	# of Single-Family Households Receiving PPP Curbside Collection Service ^{48 49}	# of Households Receiving Garbage Curbside Collection Service (no PPP curbside collection) ⁵⁰	# of Multi-Family Households	# of Multi-Family Households Receiving PPP Collection Service ^{51 52}
Central Okanagan RD	53,868	52,000	0	13,000	0
Columbia-Shuswap RD	19,549	5,958	0	1,631	0
Comox - Strathcona RD	37,994	28,496	877	4,986	0
Cowichan Valley RD	27,982	24,125	0	3,283	0
East Kootenay RD	20,774	1,400	12,675	2,646	0
Fraser-Fort George RD	36,375	0	31,030	4,739	0
Fraser Valley RD	76,362	56,922	0	32,510	2,154
Kitimat-Stikine RD	13,335	0	8,166	1,035	0
Kootenay Boundary RD	17,383	11,555	0	3,000	1,009
Metro Vancouver RD	465,971	459,090	1,340	353,979	345,819
Mount Waddington RD	4,319	260	1,752	371	0
Nanaimo RD	51,401	51,401	0	9,041	0
North Okanagan RD	30,807	30,807	0	4,781	0
Northern Rockies RD	2,026	0	0	279	0
Okanagan-Similkameen RD	29,038	28,038	0	6,202	4,652
Peace River RD	19,632	0	13,914	2,703	0
Powell River RD	12,671	5,038	0	1,141	0
Skeena-Queen Charlotte RD	6,946	0	7,574	859	0

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Regional District	Single-Family Households			Multi-Family Households	
	# of Single-Family Households	# of Single-Family Households Receiving PPP Curbside Collection Service ^{48 49}	# of Households Receiving Garbage Curbside Collection Service (no PPP curbside collection) ⁵⁰	# of Multi-Family Households	# of Multi-Family Households Receiving PPP Collection Service ^{51 52}
Squamish-Lillooet RD	12,059	5,260	2,367	1,931	0
Stikine RD	495	0	0	0	0
Sunshine Coast RD	10,962	4,192	2,013	1,218	0
Thompson-Nicola RD	50,400	32,200	4,134	9,500	9,500
Totals	1,202,930	936,118	101,941	512,511	405,666

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Appendix C – Summary of Performance Measures

Measures	2014	2015	2016	2017	2018	2019
Recovery Target	Maintain, at a minimum, the overall provincial collection rate of 208,700 tonnes as assessed during preparation of the report titled <i>Current System for Managing Residential Packaging and Printed Paper</i> (March 2012). ⁵³			Consult on and submit targets to achieve a 75% recovery rate. Goal to collect all packaging types.		
Recovery/Collection Reporting*		<ul style="list-style-type: none"> • Tonnes of PPP collected within each Regional District; • Kilograms per capita of PPP collected within each Regional District; • Tonnes of PPP recycled and recovered for the province; • Kilograms per capita of PPP recycled and recovered for the province; and • Recovery rate expressed as a percentage for the province. 				
Accessibility Performance	Maintain, at a minimum, single-family and multi-family household service levels, where these households currently receive. PPP collection, across Regional Districts as outlined in Appendix B.					
	Provide curbside collection of PPP to the approximately 102,000 households currently receiving garbage collection. service ⁵⁴ .					
	Maintain depot collection of PPP for the approximately 165,000 single-family households and the approximately 91,000 multi-family households without collection services. ⁵⁵					

⁵³ Subject to adjustments to correct any errors in the Phase 1 survey data identified during program implementation and to reflect any significant changes in the quantity of PPP available for collection

⁵⁴ With the exception of any households where a local government that currently provides curbside collection of garbage declines the market-clearing price and indicates that it prefers depot collection over curbside collection or where a local government declines the market-clearing price without indicating a preference for depot collection and the bid price received by MMBC is higher than the market-clearing price.

⁵⁵ **Re single-family households:** Appendix C of the report titled *Current System for Managing Residential Packaging and Printed Paper* (March 2012) indicates that 936,118 of the 1,202,930 single-family households are receiving collection service, leaving 266,812 single-family households without curbside collection service, MMBC will be offering PPP curbside collection services to an additional 101,941 single-family households currently receiving curbside garbage collection, leaving 164,871 single-family households reliant on depots. (Appendix C of the *Current System* report identified 217,758 households as having access only to depots.) **Re multi-family households:** Appendix C of the *Current System* report indicates that 405,666 of the 512,511 multi-family households are receiving collection service and 90,096 multi-family households have access only to depots,

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Measures	2014	2015	2016	2017	2018	2019
	Provide depot collection of PPP for the approximately 17,000 multi-family households currently without depot collection service. ⁵⁶					
	Implement streetscape pilot project.	Implement streetscape collection services				
				As part of consulting on targets to achieve a 75% recovery rate, assess collection services required to achieve targets.		
Accessibility Reporting*		Provide a summary of collection services as of December 2014 (in January 2015).				
		<ul style="list-style-type: none"> • Single-family and multi-family households receiving household collection service; and • Number and location of depots accepting PPP. 				
Consumer Awareness Targets		Conduct resident awareness research.	Establish a resident awareness benchmark.	Consult upon and submit resident awareness target.		
Consumer Awareness Reporting*		<ul style="list-style-type: none"> • Percentage of residents aware of PPP stewardship program; • Percentage of residents reporting use of available collection services; and • Visits to the 'resident' section of the MMBC website. 				

⁵⁶ Appendix C of the report titled *Current System for Managing Residential Packaging and Printed Paper* (March 2012) indicates that 405,666 of the 512,511 multi-family households are receiving collection service and 90,096 multi-family households have access only to depots, leaving 16,749 multi-family households requiring depot service.

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Measures	2014	2015	2016	2017	2018	2019
Pollution Prevention Hierarchy Performance	Target PPP for which recycling end-markets exist for collection. ⁵⁷			Target all PPP for collection and manage according to the pollution prevention hierarchy including shifting as much of the currently unrecyclable PPP from disposal or recovery up the hierarchy into recycling as possible. ⁵⁸		
	Direct 85% to 90% of collected PPP to recycling commodity markets.			As part of consulting on targets to achieve a 75% recovery rate, assess options to increase the percentage of collected PPP directed to recycling commodity markets.		
Pollution Prevention Hierarchy Reporting*	<ul style="list-style-type: none"> • Tonnes of PPP managed by recycling; • Tonnes of PPP managed by recovery; • Tonnes of PPP managed by disposal; and • Environmental impact measures to characterize actions intended to reduce the environmental impacts of PPP by producer members of MMBC, and by MMBC. 					
Other Performance Measure: Greenhouse Gas Emissions (GHG)	Conduct research and develop a data tracking and modelling system for greenhouse gas emissions (GHG).			Modify collector and post-collector service provider contracts to include reporting of the necessary data and provide training and support for its contractors.	Begin to compile GHG data from its contractors.	Full data tracking system functional.
Other Reporting Metric: Program Cost*	<ul style="list-style-type: none"> • Total program cost per tonne recovered; and • Total program cost per household. 					

* Reported in annual report submitted to MOE July 1st each year.

⁵⁷ Based on available composition data of PPP collected and the garbage stream, it is estimated that approximately 97% by weight of the PPP supplied into BC households is targeted for collection.

⁵⁸ Based on available composition data of PPP collected and the garbage stream, it is estimated that approximately 3% by weight of the PPP supplied into BC households will be the focus of research and development activities.

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Appendix D – Producer Members of MMBC

A total of 787 producers have signed Letters of Intent with MMBC as of April 5, 2013. Based on the draft definitions of obligated producer and PPP developed pursuant to the BC Recycling Regulation and Environmental Management Act, these companies have indicated that they intend to join the MMBC PPP Stewardship Plan once it is approved. Producer companies that signed Letters of Intent fall into the following sector categories:

- Food and consumer products
- Retailers (grocers, mass/general merchandisers, hardware/housewares, drug stores and specialty merchandisers)
- Electronic manufacturers/brand owners
- Horticulture and agriculture
- Media and printed paper
- Quick service/take-out restaurants
- Paint and chemical products
- Other/miscellaneous

A list is included below.

MMBC believes that a PPP program that includes all obligated producers, each paying their proportionate share of costs, is the best way to achieve a sustainable PPP program for British Columbia residents that is based on the principles of fairness and a level-playing field. Recruitment efforts will continue past the stewardship plan submission date.

Producers are invited to consult the producer section of the MMBC website at www.multimaterialbc.ca for information related to who is an obligated producer and what constitutes obligated packaging and printed paper. A list of frequently asked questions (FAQs) is also provided on the website. Letters of Intent can be downloaded and, when executed, can be sent via email to producers@multimaterialbc.ca.

MMBC will respond to queries directed to producers@multimaterialbc.ca and will arrange telephone consultations with those producers who have questions about the PPP Stewardship Plan and their obligations under the BC Recycling Regulation.

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MMBC Producers

0896786 BC Ltd (dba Andreen's Medicine Centre)
2 Brilliant Media (The Upper Canadian Magazine)
3M Canada
553142 BC Ltd DBA Pacific Prescriptions & Medical Supplies
717296 BC Ltd DBA Pacific Prescriptions & Medical Supplies No 2
A&W Food Services of Canada Inc
Aaronson's Pharmacy
Abby Pharmacy
Absorbent Products Ltd
Accenti Magazine
Acer America Corporation
Acushnet Canada
Adastra Media
Advance Nursery Co.
AG Professional Hair Care Products Ltd
AG Valley Foods
Agropur
Aimlite
Air Canada Vacations
Akzonobel Canada
Alcon
Aldergrove Credit Union
Aldergrove Nursery Ltd
Alliance Mercantile Inc.
Amway Canada Corporation
Anderson Watts Ltd
Apex Branded solutions Inc
Apotex Inc
Apple
Arbor Memorial Inc
Arc Poetry Society
Aroma Foods Ltd
Askew's Food Service Ltd
Askew's Foods Sicamous Ltd
Associated National Brokerage
ASUS Computer International
Atron
Avalon Dairy
Bad Day Magazine
Balfour Superette 1977 Ltd
Bandai America Incorporated
Bank of Nova Scotia
Barrys Drugs (1996) Ltd
Baum Publications Limited
Bausch + Lomb
Bayard Presse Canada Inc
Bayer Inc
BC Fresh Vegetables
BC Transit
Beauty Systems Group (Canada) Inc.
BeaverTails Canada Inc
Bed Bath & Beyond
Behr Process Canada Ltd
Beiersdorf Canada Inc.
Bell Canada
Benjamin Moore & Co., Limited
Best Buy Canada Ltd
Bevendale Enterprises Inc DBA The Grocery Store
Bevo Farms Ltd
Biscuits Leclerc
BIV Media Limited Partnership
Black Press
Blueridge Pharmacy
Blueridge Produce
BMO Financial Group
BMW Group
BOATsmart! Canada
Boehringer Ingelheim (Canada) Ltd
Boomer Drugs Pharmacy
Border Crossings Magazine
Boulevard Lifestyles Inc.
Breizh Salon Services Ltd
Brick, A Literary Journal
Brisco General Store
British Columbia Automobile Association (BCAA)
British Columbia Historical Society
British Columbia Liquor Distribution Branch
British Columbia Lottery Corporation (BCLC)
Broken Pencil Magazine
Bron and Sons Nursery Inc.

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Brooks Brothers Canada Ltd
Browns Shoes Inc
BSH Home Appliances Ltd
Bulk Barn Foods Ltd
Bulkley Credit Union
Burger King Restaurants of Canada Inc
Burnaby Lake Greenhouses Ltd
Burnbrae Farms
Burrard Pharmasave Health Centre
Buy-Low Foods LP
Bylands Garden Centre Ltd
Bylands Nurseries Ltd
C&J Clark Canada Limited
Calendar Club of Canada
Campbell's Company of Canada
Canada Dry Mott's Inc
Canada Garlic Inc.
Canada Safeway Limited
Canada Wide Media
Canada's History Society
Canadelle Limited Partnership
Canadian Dimension
Canadian Education Association
Canadian Fishing Company
Canadian Geographic Enterprises
Canadian Notes and Queries
Canadian Scrapbooker Inc
Canadian Technical Tape Ltd (Cantech)
Canadian Tire Corporation Limited
Canadian Woodworking, a division of Sawdust Media Inc
Cannor Nurseries Ltd.
Canon Canada
Capital One Bank, Canada Branch
Cara Operations Limited
Carlson Wagonlit Travel
Carlton Cards Ltd
Carsons Corner
Castle Cheese (West) Inc
CCEC Credit Union
Cedarrim
Central 1 Credit Union
Central 1 Trust Company
Central Drug Stores Ltd
CertainTeed Gypsum Canada
CGA Magazine
Chalifour Canada
Chandan Ent Ltd (DBA Langley Medicine Centre Pharmacy)
Chenchiam, Inc, operating as Sunrider International Canada
Chrysler Canada
Church & Dwight Canada Corp
CIBC
Cinema Scope
CKF Inc.
Claire's Stores Canada Corp
Clarion Canada Inc
Clearview Horticultural Products Inc.
Clorox
Clover Leaf Seafoods
Cloverdale Paint Inc.
Coast Mountain Dairy
Coastal Community Credit Union
Coca-Cola Refreshments Canada
Colgate-Palmolive Canada Inc
Columbia Valley Credit Union
Columbia Valley Pioneer
Community Savings
ConAgra Foods Canada Inc.
Contentra Financial Services Association
Copperside Foods Ltd
Cornucopia Enterprises Ltd
Cornwall Publishing Company Ltd
Costco Wholesale Canada Ltd
Cotes Medicine Centre
Cott Beverages
Cottage Life Media
Country Garden Ltd
Country Grocer
CTC Bank of Canada
CTG Brands Inc
CY Growers
Dairy Queen Canada, Inc
Dallas Market Fresh Foods Ltd

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Dance Media Group	Elements Compounding Pharmacy Ltd
Danone	Eli Lilly Canada, Inc ("Lilly")
Dare Foods Limited	Elizabeth Arden Canada Ltd
Darvonda Nurseries	EMD Inc
David Chapman's Ice Cream Ltd.	Emerson Electric Canada Ltd
David Oppenheimer and Company	Empire Supermarket (2010) Ltd
Davies Prescription Pharmacy	Energizer Canada Inc
Daybreak Farms	Envirogard Products Limited
Deeley Harley-Davidson Canada	Epic Pharmacy Inc
Dee's General Store	Epson
Dell Canada	ESPACE
Delta Prescription Clinic	Estee Lauder Companies
Denman Island General Store	Estevan Pharmacy
Discovery Islands Organics	Ethical Bean Coffee Company
Disticor Direct Retailer Services	Exemplar Horticulture
DLM Foods Canada Corp	Export Packers Company Limited
Dockside Green Ltd/Dockside Green Partnership Ltd	Fairfield People's Pharmacy 367
Dole Packaged Foods Company	Fairway Market, Victoria, BC
Dollarama L.P.	FaithLife Financial
Dominos Pizza	Falkland Store Ltd
Downhome Publishing Inc	Farrow & Ball
Dr. Oetker Canada	Federated Co-operatives Limited
Dream Wave Publishing Inc.	Federation of Canadian Naturists
Driediger Farms Ltd	Ferrero Canada Ltd.
Dutch Heritage Greenhouse	Ferring Pharmaceuticals
Dynamite Stores Inc	FIJI Water of Canada Ltd
E I du Pont Canada Company	First Credit Union
E.D. Smith	Floral Direct Wholesale Inc
Earth's Own Food Company Inc	Foley's Candies Ltd
East End Pharmacy	Foot Locker Canada
East Richmond Nurseries	Ford Motor Company
Eastlink	Forest Gold Products Ltd
Eat Well Ethnic Foods Inc	Fort Nelson News
ECCO Shoes Canada Inc.	Fourcorner Publishing Inc.
Eco Parent Magazine	Fraser Heights Pharmacy
Ecotrend Ecologics Ltd	FreeFall Literary Society of Calgary
Eddie Bauer LLC	Freud Canada
Eddi's Wholesale Garden Supplies Ltd.	Frobisher International Enterprise Ltd
Edible Coast Enterprises Inc (dba Gone Crackers)	Fruits and Passion
Eighteen Bridges	G.R.Pettie Inc (DBA) Fraser Lake Medicine Centre
Elco Fine Foods Inc.	Gabriola Sounder Weekly

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Galleries West	Henry Company Canada
Garant	Hershey Canada Inc.
Garden Making Magazine	Hewlett-Packard
Garden Protein International, Inc	Hi-Fi Centre Ltd
Gates Canada	Highliner Foods Inc.
Geez Magazine	Hill's Pet Nutrition Canada
Geist	Hitachi Koki Canada Co
General Mills Canada Corporation	Hoffmann-La Roche Ltd
General Motors Canada	Hogarth's Clinic Pharmacy
General Paint Corp	Hollandia Greenhouses
Giant Tiger Stores Limited	Hollyburn Pharmacy Ltd
Give and Go Prepared Foods Corp	Home Depot of Canada Inc.
Glacier Media Group	Home Drug Mart Ltd
Gladwin Pharmacy	Home Hardware Stores Limited
GlaxoSmithKline	Honda Canada
Global Gourmet Food Inc	Horn Enterprises Ltd
Global Upholstery Co Inc	Horse Community Journals
Globe and Mail	Horse Country Magazine
GOJO Industries, Inc	Horse Publications Group
Golden Boy Foods	House & Homes Media, a division of Canadian Home Publishers
Golden Valley Foods	Howe Street Pharmacy
Goldilocks Bake Shop (Canada) Inc	Hubbell Canada LP
Golf Town	Huckleberry Mountain Mkt
Grand and Toy	Hudson's Bay Company
Greater Vancouver Community Credit Union	Hyundai Auto Canada Corp
Great-West Life	ICBC
Green Shield Canada	Ideal Security Inc.
Greenhouse Delight Foods	IKEA Canada
Groupe Marcelle Inc	Impressions Marketing Inc
Gulf Islands Driftwood	Indigo Books & Music Inc.
H&R Block	Industrial Thermo Polymers Limited
H,F & H Enterprises Ltd dba Healthside Pharmacy	Ingram Micro Inc
H.Y. Louie Co Limited	Ingram Pharmacy Ltd
Hain Celestial Canada	Innovak
Happy Days Dairies Ltd	Inside Track Communications
Hart Hardware Ltd	Interior Savings Credit Union
Headlands Garden Plants Limited	Intervet Canada Inc
Health Team Holdings Corporation	Investors Group Financial Services Inc
Heinz Canada	iovate
Helen of Troy	Irving Tissue Corporation
Henkel Consumer Goods Canada Inc.	Island Independent Buying Group Ltd

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ITW Evercoat	Larosa Food Importing & Distributing (2002) Ltd
Jamieson Laboratories	Laser Valley Technologies
Jan K Overweel Ltd	Laurel Greenhouses Ltd
Janes Family Foods Ltd	LE CHATEAU INC
JELD-WEN	Lee Valley Tools
John Deere Canada	LEGO Canada Inc
Johnson & Johnson Inc	Lenovo
Johnston Packers (1995) Ltd	Lexmark Canada Inc.
Johnston's Butcher Shop Ltd	LG Electronics Canada Inc
JP Morgan Chase Bank N.A.	Liberty Food Store Fruitvale Ltd
JTI-Macdonald Corp	Libra the Rice People (Libra National Inc)
JVK Limited	LifeScan Canada Ltd
Kao Canada Inc	Limited Brands Canada
Kare Team Holdings Corporation (Simikameen Pharmacy)	Linda Pharmacy
Kaslo Grocery Ltd	Liquor Boys Ent Ltd
Kato's Nursery	LMPI (a division of HDS Canada)
Katz Group Canada Inc	Loblaws Inc
Kaz Canada Inc.	Lock's Prescription Pharmacy
Keir Fine Jewellery	London Drugs
Kellogg Canada	Low Cost Western Pharmacy #1
Kerrisdale Pharmacy (1982) Ltd	Low Cost Western Pharmacy #2
Kia Canada Inc	Lowes Canada
Kidde Canada Inc.	Lu & Sons Enterprise Ltd
Kilipi Road Greenhouses	Lucerne Foods (Burnaby Milk)
Kimberly-Clark Inc.	Lush Handmade Cosmetics Ltd
Kipp-Mallery Pharmacy	M&M Meat Shops Ltd
KLEEN-FLO TUMBLER IND.LTD.	M. Van Noort & Sons Bulb Co Ltd
Knape & Vogt Canada	Macdonald's Prescriptions
Kootenay Savings Credit Union	Mackenzie Investments
Kraft Canada Inc.	Maddies Natural Pet Products Ltd
KRIK Services Co	Magazines Canada
Kroll's Surrey Pharmacy	Main Street Remedy's RX
Kruger Products Limited	Manulife Financial
L & J Grocers	MAPEI Inc
La Cie McCormick Canada Co.	Maple Leaf Foods
La Vie Remedy's RX	Maple Pharmacy
Lake View Credit Union	Marc Anthony Cosmetics Inc
Lakeside Clinical Pharmacy	Mardell Greenhouses Inc
Lakeside Pharmacy	Mario's Gelati Ltd
Lambert-Kipp Pharmacy Ltd	Marks Pharmacy
Landmark Medical Systems	Marshall Pharmacy

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Mary Kay Cosmetics Ltd	Naz Enterprise Ltd
Masco Canada Ltd	Naz Pharmacy No #2
Matrix Magazine	Neatfreak Group Inc.
Mazda Canada Inc	Neo-opsis Science Fiction Magazine
McCain Foods Canada	Nestle Canada Inc.
McDonald's Restaurants of Canada	Nestle Purina PetCare
McGregor Industries	New York Fries (122164 Canada Limited)
MD Physician Services Inc	Newell Rubbermaid
Mead Johnson Nutrition	NICHE Magazine
Meadowfresh Dairy Corp	Nikon Canada Inc
Media Marketing	Nintendo of America Inc.
Medicine Shoppe #169	Nissan Canada Inc
Memorial Compounding Medicine Centre	Nokia Products Limited
Mercedes-Benz Canada Inc	Nongshim America, Inc
Merit Leisure Group Inc	Nordic Nurseries Ltd.
Microsoft Canada	North Peace Savings and Credit Union
Miele Limited	Northburn Remedy's RX
Misty Mountain Industries Ltd	Northern Gold Foods Ltd.
Mitsubishi Motor Sales of Canada, Inc.	Northern Savings Credit Union
Modern Dog	Northwest Landscape Supply
Momentum Magazine	Novartis Consumer Health Canada
Monahan Agency Ltd	Novelis Inc
Mondelez International	Nuvo Magazine
Montecristo Magazine	Oakridge South Tower Pharmacy
Morgan Creek Medicine Centre	Oatey Canada Supply Chain Services Co
Morinda Canada Co	Observer Publications Inc.
Morris National Inc.	Ocean Spray International
Mosaic	Okanagan Valley Newspaper Group
Mosterman Plants Inc	Old Dutch Foods
Mother Parkers Tea & Coffee	Oliver Chronicle
Motorcycle Mojo	Olympic Dairy
Motorola Mobility	Omer DeSerres
MTF Mainland Distributors Inc	On Site Review
MTY Group	On Spec Magazine (The Copper Pig Writers Society)
Musicworks Magazine	Open Letter
Nanoose Medicine Centre	Opera Canada
Naor Skincare Science Inc	Oriental Orchids Ltd
National Safety Association of Canada	Osoyoos Credit Union
Natural Factors Nutritional Products Ltd	Osoyoos Times
Naturally Homegrown Foods Ltd	Osram Sylvania
Nature's Path Foods, Inc	Our Times

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Outpost Magazine	Poor Richard's Distributing Corp
Overwaitea Food Group	Porsche Cars Canada, Ltd.
Owlkids	Port Kells Nurseries Ltd
P & J vanHaaster	Post Foods Canada Inc
Pace Processing and Product Development Ltd	Powell River Living Magazine (Southcott Communications)
Pacific Newspaper Group	PPG Architectural Coatings
Pacific West Perennials	Prairie Fire Press, Inc
Pacifica Nurseries	Premier Tech Home & Garden Inc.
Page One Publishing	Prescription Health Studio
Pan American Nursery Products Inc	Primus Telecommunications Canada Inc (Primus)
Panago Pizza	Principal Sales Inc.
Panasonic Canada Inc.	Prism International Magazine
Paradise Island Foods Inc	Pro Organics, a division of UNFI Canada, Inc
Paridon Horticultural Ltd	Procter & Gamble Inc
Park Pacific Pharmacy	Prospera Credit Union
Party City Canada Inc	Punjab Milk Foods Inc
Payless ShoeSource	Purdy's Chocolates
Penncorp Life Insurance	Purple Springs Nursery
Penticton Whole Food Emporium Ltd (dba Whole Foods Market)	Market Canada Inc.
Peoples Drug Mart #122 (Mackenzie Drugs Ltd)	Quadrant Cosmetics Corporation
Peoples Drug Mart #168 (PDM Stores Ltd)	Qualicum Medicine Centre
Peoples Drug Mart #43	Qualitree Propagators Inc
Peoples Drug Mart 175	Queen's Quarterly
Peoples Pharmacy #357	Quilter's Connection Magazine
PepsiCo Beverages Canada	R&K Pruden Foods
PepsiCo Foods	Raincoast Book Distribution Ltd
Pet Connection	Rampike
Pet Valu	Rapid Media
PETM Canada Corporation	RBC Royal Bank
Pfizer Canada Inc.	Readers Digest Magazines Canada Limited
Pharmasave 253	Reckitt Benckiser (Canada) Inc
Pharmasave Health Centre #056	Recochem
Pharmexcel Holdings Inc (Medicine Shoppe Pharmacy #056)	Red Basket Foods
Pickseed Canada Inc	Red Bull
Pier 1 Imports (U.S.), Inc	Redcap Enterprises Company Ltd
Piroche Plants Inc	Regency #6 Medicine Centre
Plantronics, Inc.	Regency Medicine Centre
Plasti-Fab Ltd	REHA Enterprises
Plum Clothing Ltd	Reid's Pharmasave Health Centre
Poetry Is Dead Magazine Society	Reinhart Foods
Point of View Magazine	Reitmans (CANADA) Ltd

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Remedy's Corporate Holdings Inc	Shop Vac
Remington Medical Equipment	Shoppers Drug Mart Inc.
Rempel & Sons Meat Co Ltd	Simmons Canada Inc.
Reser's Fine Foods	Sing Tao Newspapers (Canada 1988) Ltd
Resolute Marketing Ltd	SkyNews Magazine
Revlon	Slocan Village Market Ltd
Riverside Pharmacy Ltd o/a Pharmasave Health Centre #5041	Soltham Ventures
Robert Bosch Tool Corporation	Smucker Foods of Canada
Roche Diagnostics	Snap-On Tools of Canada Ltd
Rocky Mountain Goat News	Snowfarms Ltd.
Rogers Communications Partnership	Sobeys
Rogers Publishing Limited	SoftMoc
Roland Canada Ltd	Somass Drug Store
Rolf C Hagen Inc	Sonray Sales Ltd
RONA	Sony Of Canada Ltd.
Room Magazine	Soparc International Inc.
Rothmans, Benson & Hedges Inc.	Southern Tip Publishing
Royal BC Museum	Spacing Media Inc
Running Room Canada	Sperling Holdings LTD
S Brar Pharmacy Ltd	St Joseph Media
S M Products	STANDARD PRODUCTS INC
Sad Magazine Publishing Society	Stanley Black & Decker Canada Corporation
Safety Mart #5 (1994) Ltd	Stanpro Lighting Systems
Safety Mart No 7 (2001) Co Ltd	Staples Canada
Sam & Sue Holdings (Tabor Pharmacy)	Star Marketing Ltd
Samsung Electronics Canada Inc	Starbucks Coffee Canada, Inc.
Sana'aih Market General Partnership	Storck Canada Inc.
Saputo Dairy Products Canada G.P.	Studies in Canadian Literature
SBC Firemaster Ltd	Studio Magazine
SC Johnson & Son Ltd.	Sukh's Pharmacy Ltd
Schwartz Chemical Corporation	Summerland & District Credit Union
Scotts Canada Ltd.	Summerland Medicine Centre Pharmacy
Sears Canada Inc	Sun Life Assurance Company of Canada
Seoul Trading Corp	Sun Products Canada Corporation
September House Publishing	Sunbeam Corporation Canada Limited
Shaklee Canada Inc.	Sunnyside Supermarket
Shandro Investments Ltd dba Sun Valley Fresh Foods	SunnysideSupermarket
Sharp Electronics of Canada	Sunovion Pharmaceuticals Canada Inc.
Sherwin-Williams Company	Sunrise Markets Inc dba Sunrise Soya Foods
Shiseido Canada Inc.	Sunrise Pharmacy
Shoal Compounding Pharmacy Inc	SunRype Products Ltd

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Sunshine Coast Credit Union	The Shopping Channel (division of Rogers Broadcasting)
SunStar	The Slocan Valley Co-operative Association Ltd
Supercom Canada Ltd	The Social Justice Committee of Montreal
Superior Tofu Ltd	The Source (Bell) Electronics Inc.
Suzuki Canada Inc	The Standard Life Assurance Company of Canada
Suzy's Inc	The TDL Group Corp - Tim Hortons
Swan Lake Nurseryland	The Toronto Dominion Bank
Swarovski Canada Limited.	The Upper Canadian Antiques Showcase
Swedish Press Inc	The Writers Guild of Canada
Synnex Corporation Canada	Things Engraved
Taisuco Canada Agricultural Corp	Thomas Large Singer Inc.
Tanner Young Publishing Group	Thrifty Foods
Taplow Ventures Ltd	Thriftys Inc (2005)
Target Canada	Tilley Endurables Western Inc
Tata Global Beverages Canada Inc	Tilley Endurables, Inc
Taymor Industries Ltd	TJX Canada
Techni-Gro Greenhouses Inc.	Tofino Pharmacy
TerraLink Horticulture	Toppits Foods Ltd
Thai Away Restaurants & Food Services Ltd	Toshiba of Canada Limited
The Antidote Pharmacy #1,2,3	Toyota Canada Inc
The Antigonish Review	Toy's Pharmacy
The Association of Universities and Colleges of Canada (AUCC)	Toy's ' Us Canada Ltd.
The Brick	Trader Corporation
The Capilano Review	Trail Bay Developments Ltd
The Claremont Review	Trajan Publishing Corporation
The Cora Franchise Group Inc	Transcontinental Media Inc.
The Dominion of Canada General Insurance Company	Trice Farms Ltd DBS Grow and Gather
The Evangelical Fellowship of Canada (Faith Today Magazine)	Trizec
The Fraser Valley Farm Direct Marketing Association	Tumber Ridge News
The Gap, Inc.	Tumbler Ridge Pharmacy
The Hillman Group	Turtle Island News Publications
The Infertility Awareness Association of Canada	Tux Pharmacy
The Literary Review of Canada	TV Publishing Group Inc
The Medicine Shoppe Pharmacy #253	Two EE's Farm Ltd
The Medicine Shoppe Pharmacy #333	UAP Inc
The Mentholatum Company of Canada	Ultima Foods
The Nashwaak Review	UNFI Canada Inc
The Natural Gardener Garden Store	Unicare Pharmacy
The New Quarterly Literary Society Inc	Unicity Canada Ltd
The Pacific Rim Review of Books	Unilever
The Pampered Chef Canada, Ltd.	uniPHARM Wholesale Drugs Ltd

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Uni-Select Pacific Inc
Unisource Canada Inc.
United Flower Growers
University Heights Pharmacy
Urban Barn Ltd
USANA Canada Company
Valley Evergreen Pharmacy
Valley Food Store
Valley General Store
Valleybrook Gardens Ltd
Valu-Plus Foods Ltd
Valvoline Canada, a division of Ashland Canada Corp
Van Belle Nursery
Van Saane Greenhouses
Vancouver 24 Hours
Vancouver City Savings Credit Union
Vanderpol's Eggs Ltd
VantageOne Credit Union
Vector Marketing Canada Corporation
VELUX Canada Inc.
Venture Publishing
Victoris Compounding Pharmacy LTD
Visual Arts News
Vitalis Nutrition
Vitamin A Industries Inc
Volkswagen Group Canada Inc.
Vtech Technologies Canada
W. Ralston (Canada) Inc.
Wakefield Canada Inc
Walmart Canada
Waterline Products
Watershed Sentinel
Wellness Pharmacy
Wendy's Restaurants of Canada Inc
Whirlpool Canada
Whole Foods Market
William E Coutts Co Ltd (operating as Hallmark Canada)
Williams Lake and District Credit Union
Willow Pharmacy Ltd
WN Pharmaceuticals Ltd
WORN Fashion Journal
Wrigley Canada
Wynndel Foods
Yamaha Motor Canada Ltd
Yellow Pages Group
YM Inc (Sales)
York Pharmacy
Your Workplace Magazine
Zinetti Food Products Ltd
ZoomerMedia Limited
Zwilling J A Henckels Canada Ltd