



Reference: 305825

December 9, 2016

Allen Langdon, Managing Director
Multi-Material British Columbia
209-1730 West 2nd Avenue
Vancouver BC V6J 1H6

Dear Mr. Langdon:

RE: Stewardship Plan Amendment

Thank you for submitting a proposed amendment to the Multi-Material BC (MMBC) Packaging and Printed Paper (PPP) Stewardship Plan on November 29, 2016. I understand that through this proposed amendment, MMBC is requesting changes to its stewardship plan to allow for the inclusion of communities into the MMBC program that previously declined MMBC service offerings or failed to respond to the original MMBC deadline, but now desire to be part of the MMBC program. The changes proposed focus on:

- Adding new language to the plan to support program accessibility; and
- Extending the timeframe of the plan and its performance measures.

As per Section 5 (5) of the Recycling Regulation (the Regulation), the Director has the ability to amend an approved stewardship plan. I have completed my review of the requested amendment and hereby approve the amendment to the MMBC PPP Stewardship Plan as submitted. Please be advised that this approval applies only to materials or content contained in the plan that pertains to the requirements of Section 5 of the Regulation.

In approving this amendment to the MMBC Stewardship Plan, I am satisfied that:

- The MMBC stewardship program continues to meet the requirements of Section 5 in the Regulation.
- This amendment fulfills the original intent of the MMBC Stewardship Plan, and expands recycling of PPP in British Columbia to meet key performance targets.
- The public interest of British Columbians is met, in that MMBC will be able to fully expand its program to communities currently eligible for, but not receiving producer-funded recycling services, in as timely a manner as possible.
- Given the limited scope of this amendment and upcoming comprehensive consultation process scheduled for the Fall of 2017 as set out in the current plan, consultation is not necessary at this time.

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- With regard to competition, nothing in the amendment prohibits any stewardship agency from submitting a competing PPP stewardship plan as currently allowed for under the Regulation.
- This amendment is consistent with the opportunities for improvement identified in a recent report by the Office of the Auditor General of British Columbia including:
 - Considering the competitive landscape for stewardship plans; and
 - Ensuring province-wide access to recycling services.

Given this decision, I note that, upon review of provincial Extended Producer Responsibility programs across the country, the ability to amend a stewardship plan is consistent with other provinces that have a similar regulatory structure. I also note that stewardship plans do not expire in British Columbia; the amendment simply clarifies the application of performance measures beyond 2019. Finally, the MMBC plan may be subject to further amendment or regulatory change based on recommendations flowing from the Ministry's current review of best practices in extended producer responsibility and competition among stewardship agencies.

This amendment takes effective as of December 12, 2016. I look forward to working with you to ensure your program continues to be successfully implemented. If you have any questions about this approval or the implementation of your plan, please contact Mr. Lucas Harris at 250 387-9774 or Lucas.Harris@gov.bc.ca.

Sincerely,



Mark Zacharias
Assistant Deputy Minister
Environmental Protection Division

cc: Lucas Harris, Senior Policy Analyst, Extended Producer Responsibility, Ministry of Environment
Bob McDonald, Director, Extended Producer Responsibility, Ministry of Environment
Kris Ord, Executive Director, Environmental Standards Branch, Ministry of Environment