



Reference: 312263

October 19, 2017

John Hinds  
President and CEO  
NEWS MEDIA CANADA | MÉDIAS D'INFO CANADA  
37 Front Street East, Suite 200,  
Toronto, Ontario  
M5E 1B3

Dear Mr. Hinds:

### **Packaging and Printed Paper (PPP) Stewardship Plan**

Thank you for submitting News Media Canada's (NMC) PPP Stewardship Plan on February 16, 2017 and subsequent revised versions through to the final plan submitted on September 29, 2017 (current version) in fulfillment of requirements under Section 4 of the Recycling Regulation of the *Environmental Management Act*. I appreciate the newspaper industry's continued commitment towards achieving compliance in this regard.

I have completed my review of the submission and hereby approve the NMC Schedule 5 Stewardship Plan 2017 for management of its newspaper material. The reason for my decision is based on this plan meeting all regulatory requirements as per Section 5(1) of the Recycling Regulation and applicable components of Section 5(2), such as sub-sections (l) and (m).

In particular, I note the following key features of the plan as submitted:

- **Recovery Rate:** NMC will maintain as a minimum the mandated 75 percent recovery rate until a first year audit is conducted to determine an actual rate. This will set the expectedly higher than 75 percent recovery rate as a baseline. As noted in the plan, there will be no going backwards in terms of a recovery rate from this point forward;
- **Recovery Rate Reporting:** NMC will report annually on newsprint tonnage distributed to residential premises; utilize Recycle BC (RBC) audited data on newspaper material collected and recycled; provide the breakdown of tonnage distributed by regional district (as available from RBC data); and formulate and report on the annual recovery rate percentage;
- **Consumer Awareness:** Beyond the consumer awareness measures relied upon in the RBC stewardship plan, NMC will provide targeted promotion of the existing collection system for

- newsprint shortly after plan approval, and will continue with newspaper recycling awareness during plan implementation, with a consumer awareness survey to be conducted in 2020;
- Consumer Accessibility: NMC will ensure the residential recycling experience will not change i.e. the current form and level of collection will continue as currently as a minimum. NMC will report out on the accessibility regarding single-family, multi-family, depot, and where applicable, streetscape collection. Further to this measure, although the NMC stewardship plan relies on RBC fulfilling its stewardship plan commitments, NMC also ensures such access will continue should RBC no longer provide such services;
  - Adequately Paying the Costs: NMC's commitment in the plan to ensure payment of the costs associated with collection and management of its product during the five-year term of the plan, will, in the context of arrangements made for such payment, adequately provide for producers bearing the costs of managing and collecting their product; and
  - Pollution Prevention Hierarchy & Environmental Impacts: NMC will continue to make efforts with its members to reduce environmental impacts of paper and inks; ensure 85% of inks used by members are soy-based and increase to 95% by 2021 (assuming available supply); and provide promotional messaging on sorting and clean newspaper recycling.

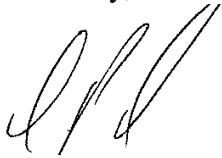
As noted, the basis of this approval is not limited to the above-noted factors, as consideration was given to many additional aspects of the plan in fulfillment of all regulatory requirements. As well, this stewardship plan approval covers the next five-year period from execution date as per Section 6 of the Regulation, but does not include approval for the section of the plan entitled Appendix C: Contingency Plan/Stand-Alone Plan. This contingency plan is considered a separate plan as noted in the NMC plan, and would have to go through its own complete consultation process before being submitted for approval.

As a regulatory requirement, NMC commits to submitting an annual report with detailed performance measures. The first annual report is expected on July 1, 2018 with a summary report of 2017 data for the implementation portion of the plan. We expect NMC to strive to exceed and continuously improve on the actions and targets within its plan.

Beyond the basis of this decision, I also note that the newspaper sector has come to similar arrangements towards achieving compliance in other provinces with Extended Producer Responsibility (EPR) programs over the past several years. Furthermore, not only does approval of this plan representing such a large PPP sector mark a significant compliance milestone for all involved, it indirectly supports the expansion of recycling services to communities across BC.

I look forward to working with you to ensure the success of your program. If you have any questions about this approval, or the implementation of your plan, please contact Leeanne Fraser at 778-698-4845 or [Leeanne.Fraser@gov.bc.ca](mailto:Leeanne.Fraser@gov.bc.ca).

Sincerely,

A handwritten signature in black ink, appearing to be 'DM', written in a cursive style.

David Morel  
Assistant Deputy Minister, Environmental Protection Division  
Ministry of Environment and Climate Change Strategy

cc: Kris Ord, Executive Director, Environmental Standards Branch  
Bob McDonald, Director, Extended Producer Responsibility  
Leeanne Fraser, Senior Policy Analyst, Extended Producer Responsibility



**News Media Canada**  
**Médias d'Info Canada**

**Stewardship Plan**

SEPTEMBER 2017



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## 1. Introduction

Newsprint is one of the most well-established recyclable commodities in British Columbia (BC) and around the world. Newspaper was the original backbone of residential recycling programs and drove the establishment of the now three-decade old Blue Box/Bag recycling system in BC. Recovered newsprint has strong rates of recycling, and is an abundant, high value commodity that has traditionally assisted in offsetting recycling collection costs, and provided a crucial subsidy that has helped municipalities sustain the collection of other Blue Box/Bag materials.

Newsprint is also distinct in that it is a product as opposed to packaging that should be reduced where possible. The inherent value of this product is that it provides a platform for media to communicate with a large audience and as such is a critical element of a free and democratic society, providing accountability for governments and private institutions, and ensuring an informed public.

In May of 2014, Schedule 5 of the British Columbia *Recycling Regulation* (B.C.) Reg. 449/2004 came into effect, requiring that producers of Packaging and Printed Paper (PPP) be covered under an approved stewardship plan. The PPP category includes newsprint as a type of “printed paper”. Under the umbrella organization the Canadian News Media Association dba News Media Canada (“NMC”), BC’s newspapers have worked to produce a stewardship plan intended to address the interests of all stakeholders, and ensure continued high levels of newspaper recycling in BC.

## 2. Stewardship Agency

The proposed stewardship plan for residential newsprint has been prepared by BC members of NMC.

NMC is the voice of the print and digital media industry in Canada, providing services to member media organizations in areas like public affairs, marketing, research and product stewardship. NMC currently represents 5 major publishers in BC (Postmedia Network Inc., The Globe and Mail Inc., Black Press Group Ltd., Glacier Media Inc., and Sing Tao Newspapers), who collectively produce 121 individual print news publications. Together NMC’s members account for both the vast majority of the publications as well as approximately 90% of the overall newsprint tonnage distributed in BC.

The remaining newspaper producers in BC are being made aware of NMC’s stewardship plan and are invited to become members as a means of fulfilling their regulatory obligations. If there are any changes to the newspaper producers that are discharging their responsibilities under the *Recycling Regulation* through implementation of this plan (“Participating Producers”), the Ministry of Environment will be notified.

NMC is a national organization that is incorporated under the federal *Not for Profit Corporations Act* (Federal Corporation Info can be found here: <https://www.ic.gc.ca/app/scr/cc/CorporationsCanada/fdrlCrpDtIs.html?corpId=9862790>). The organization was formed in 2016 as the result of the amalgamation of the Canadian Newspaper Association and the Canadian Community Newspapers Association and has approximately 800 members from Canada's daily, weekly and community newspapers.

NMC is governed by a board made up of a minimum of 10 and maximum of 17 directors who are appointed by the membership (information on the current board can be found here: <https://nmc->

[mic.ca/about-us/boards-of-directors/](http://mic.ca/about-us/boards-of-directors/)). The board reflects the diversity of the industry and the communities they represent by striking a balance between daily and weekly, small and large, corporate and independent newspapers, as well as taking into account linguistic and geographic diversity. Rules around the organization's governance and operations are clearly laid out in its bylaws, which are available for review here: <https://nmc-mic.ca/about-us/bylaws/>. NMC is based in Toronto and is supported by a CEO and a small contingent of staff.

The management of stewardship plans has been one of the functions of NMC and its predecessor associations for many years – the newspaper industry's Ontario plan since its inception in 2002, for example. NMC is acting as the assigned stewardship agency for this BC plan on behalf of the above mentioned publishers, in order to gain their compliance under the *Recycling Regulation*, Schedule 5. The plan will be managed by the staff at NMC with policy decisions being made by the board and its relevant committees.

NMC will also be the centralized host for electronic documents related to this plan (including the plan itself), as well as other information on recycling in BC on its website: <https://nmc-mic.ca/public-affairs/newspapers-and-recycling/bc-stewardship/>

### 3. Regulatory Context

Prior to Schedule 5 being added to the *Recycling Regulation*, newsprint recycling was not regulated in BC (aside from local disposal restrictions). Its addition now means that “a producer must (a) have an approved plan under Part 2 [Product stewardship plans] and comply with the approved plan with respect to a product in order to sell, offer for sale, distribute or use in a commercial enterprise the product in British Columbia.”

Following this change, BC's newspapers actively worked together to prepare a compliant plan, going through multiple iterations that have ultimately lead to the following stewardship plan. The intent is to gain Ministry of Environment approval for this plan to be in effect for a minimum of 5 years. At the end of this term, NMC will evaluate the performance of the plan and consider how to proceed.

Appendix C is provided at this time to share possible future intentions of NMC and gain initial feedback during consultation. However, these future intentions are not to be considered part of the NMC stewardship plan being submitted for approval to the Ministry of Environment, but are included only for context. If NMC proceeds with the approach laid out in Appendix C, a new or significantly amended stewardship plan will be developed, consulted upon and submitted for approval under the *Recycling Regulation* at that time.

### 4. Definition of Newsprint

*Recycling Regulation* 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 this stewardship plan, newsprint is considered “printed paper” under the list of PPP items and encompasses the main body of a newspaper comprising the news and other sections,

including advertising printed within these sections. Printed paper may also include magazine type paper for members of the plan that produce and distribute this type of material in BC.

Printed paper for which newspaper producers are responsible under the *Recycling Regulation* does not include flyers or other inserts that are separate from the newspaper itself. Under the *Recycling Regulation* these are the direct responsibility of the owner or licensee of the trademark under which the flyers are circulated (i.e. the advertiser). Producer obligations further do not apply to any samples, merchandise, or other promotional items which may be distributed alongside or within a newspaper; these are also the direct responsibility of the advertiser or brand owner.

Under Section 5 of the *Recycling Regulation*, a PPP plan must adequately provide “for the collection of the product by the producer from residential premises and from municipal property that is not industrial, commercial or institutional property”. This plan therefore includes only newsprint disposed of at residential properties and street facilities. It does not include any material from printing facilities, such as start-up waste, off-cuts or over-issue newspapers, nor newspapers from commercial settings such as offices, hotels and schools.

During consultation, a question arose about the inclusion of plastic film packaging that may be used for some newspapers during the wetter months in order to keep them dry. Such material is covered by this plan as it is acceptable in Recycle BC’s depot system (upon which this plan relies) along with other types of plastic film packaging.

For reporting and recovery rate calculation purposes, producers covered under this plan will track the weight of all newsprint and similar product distributed to residential premises and street facilities as described above. These quantities will then be reported on and used as the denominator in any recovery rate calculations, and only this material will be covered by the plan.

## **5. Program Development**

Newsprint is a unique type of PPP that newspapers are printed on. As noted previously, newspapers are a product – not a package or simply promotional printed paper – that communicates news and information and as such plays a critical role in our democratic society. Whereas it makes environmental sense to charge packaging producers per tonne of waste to incent them to reduce the amount used for their products, it does not make sense to cause publishers to publish less volume of information where societal value comes from more content being published, not less. Newspapers also rely on print advertising for the vast majority of their revenue (generally 90% or more), and thus require a significant volume of pages dedicated to it. So while allocating weight-based costs to packaging or promotional printed paper is an appropriate incentive for using less material, NMC does not interpret that the intent of the *Recycling Regulation* is to reduce or eliminate such a product as newspapers by treating them as waste to be avoided.

Nonetheless, the expanded choice of news media facilitated by technology has also meant that newsprint as a platform is no longer as dominant as it once was, and less newsprint is produced and recycled as a result. This changing paradigm has meant the end of many publications and weakened the sustainability of many others.

In this context, newspapers across Canada and beyond have actively worked to comply with EPR recycling regulations through provision of “Value-in-Kind” (VIK) advertising (that they are able to provide at no charge, largely in place of cash payments) to address costs associated with compliance requirements. Working with the Government of BC, NMC has come to a similar arrangement intended to bring our members into compliance while providing benefit to the Government of BC and residents, and without significantly threatening our members’ financial ability to continue to operate. This arrangement is further discussed below, but involves NMC providing the Government of BC with mainly VIK advertising, with the savings realized by the government applied to the ongoing costs of managing newspaper through the well-established recycling network with which residents have become accustomed.

In May 2014, Multi-Material BC Society (“MMBC”) implemented their residential PPP collection and processing system across the province, providing curbside, multi-family and depot collection in most BC communities. In early 2017, MMBC’s plan and MMBC responsibilities were transferred to MMBC Recycling Inc. doing business as Recycle BC (“Recycle BC”).

With their system established, it is both logical and efficient for newsprint material to continue to be collected alongside other residential PPP. NMC therefore followed a stewardship plan approach somewhat similar to that used by other stewards in the province, such as the Electronic Products Recycling Association (EPRA) and Brewers Recycling Container Collection Council (BRCCC). EPRA’s collection system for example, utilizes the “Return-it”<sup>TM</sup> Depot system operated by Encorp Pacific. These depots are primarily used for beverage container returns, however the inclusion of the EPRA electronics program means that BC residents can return old electronics alongside beverage containers to the same place, creating a more efficient and convenient system. The BRCCC stewardship plan also utilizes other stewardship programs, such as working with Recycle BC to track beer secondary packaging that enters their system. This material is identified through material audits and the BRCCC takes financial responsibility for it, along with ensuring there is no double-counting between collection systems.

The NMC stewardship plan is based on a somewhat similar type of arrangement. Under this plan, newsprint will continue to be collected through the Recycle BC curbside, multi-family and depot system, in the same way that BC residents have become accustomed over many decades. Recycle BC and its contracted collection partners (mostly member municipalities) will continue to be the sole parties in control of how the material is collected (i.e. depot vs. curbside, single vs. multi-stream) based on collection efficiency, material value and other such considerations, and will continue to control all aspects of commodity sales for the recovered material. Details of the collection system will remain the same as set out in the approved Recycle BC stewardship plan under section 4 “Program Design”.

Under this NMC plan, the Government of BC also plays an important role. The Government of BC is a significant user of print advertising, particularly in newspapers, using it extensively to inform the public of important government initiatives. This communication is critical – particularly at the local level where the community newspaper is often the only source of local news – in keeping BC residents informed of important government affairs.

Therefore under this plan, Participating Producers will provide VIK advertising to the Government of BC, as a means to finance newsprint recycling in BC. This provision of advertising from Participating Producers to the Government of BC will result in direct cost-savings to the Government of BC, that will in turn contribute towards Recycle BC receiving full compensation for fees charged for collecting and recycling newsprint. Although this is somewhat of a unique approach to paying for stewardship

collection services, it is intended to bring newspaper publishers into compliance with the *Recycling Regulation* with no disruption to existing collection services. In addition, it will make Recycle BC better able to fund/offer collection services to additional communities across BC that had previously been waitlisted as a result of limited producer participation/funding.

It is important to note that as much as the above approach references other stewardship agency examples where one relies on and directly contracts with the other for select services, there is no such direct commercial arrangement between NMC and Recycle BC under this plan. Rather, there is significant reliance on and compensation provided through the Government of BC. This is noted only for clarification, as the net effect of these arrangements is similar to that involving direct reliance between other stewardship agencies.

## **6. Stewardship Agency Responsibilities**

NMC will ensure a number of specific duties are performed on behalf of members. These duties will be performed through partial reliance on the existing Recycle BC system, as set out in its approved stewardship plan, as well as directly by NMC.

On behalf of Participating Producers NMC will rely on Recycle BC's continued implementation of the following aspects of the Recycle BC stewardship plan:

- Material collection at curbside, multi-family buildings, depots, and streetscapes (where applicable)
- Material transfer, processing, marketing, and shipping
- Material audits
- Consumer awareness (as part of overall mix of PPP materials collected)
- Dispute resolution with Recycle BC contracted service providers

Although it is anticipated that Recycle BC will continue to implement these activities as currently, responsibility for such implementation will ultimately be with Participating Producers (newspaper producers).

Duties performed by NMC on behalf of Participating Producers, independent of the Recycle BC plan include:

- Stewardship plan preparation, consultation, revisions and submission for final approval
- NMC acting as sole stewardship agency for all member newspaper producers in BC
- Consumer awareness (working with NMC members in addition to Recycle BC's efforts)
- Tracking of annual newsprint tonnages distributed by members (working with NMC members)
- Compilation of annual recovery rate for newsprint
- Annual report preparation and third party audit
- Driving collaboration on environmental impacts (see Section 12 of this plan)
- Dispute resolution with NMC members

If for any reason this plan should become void or cease to operate, NMC will maintain its responsibility to keep member publishers in compliance. This will be achieved by working with either an alternative

existing plan if feasible or pursuing a ‘stand-alone’ plan exclusively for NMC members (i.e. not reliant on another party to fulfill select regulatory requirements).

## **7. Consultation**

The NMC stewardship plan was subject to a full consultation process as per the *Recycling Regulation* section 5(1)(b).

Consultation commenced with the posting of this plan on July 11<sup>th</sup> on NMC’s website: ([www.newsmediacanada.ca](http://www.newsmediacanada.ca)). At the same time NMC published a press release with information on the plan, the consultation period dates, consultation events, and contact information for submitting feedback. NMC notified stakeholders of this release and the plan’s publication via the various waste and recycling associations active in BC, such as the Recycling Council of British Columbia (RCBC), the Coast Waste Management Association (CWMA), the Waste Management Association of BC (WMABC), and local government networks and associations. Those in the newspaper and publishing industry were also informed via NMC networks. Notification of consultation through these associations ensured awareness of the plan reached all stakeholders, including local and regional governments, newspaper producers, industry associations, environmental groups, First Nations, and the BC public at large.

NMC conducted 3 webinars on July 20<sup>th</sup>, August 16<sup>th</sup> and September 8<sup>th</sup>, which were accessible to any and all interested stakeholders including members of the public. These events consisted of a slide presentation including:

- Critical plan elements
- A clear explanation of how the NMC plan relies on elements of the Recycle BC plan and system
- Potential impacts on those effected by the plan
- Clarification regarding the information-only nature of the possible future plan described in Appendix C
- Q&A

Questions received during these events were documented. A list of questions and answers and a description of how, if appropriate, they were incorporated into the stewardship plan is included as Appendix D.

This consultation program lasted considerably longer than the 45 day minimum set out by the Ministry of Environment. That said, following implementation, NMC will continue to accept stakeholder feedback as it may arise throughout the 5 year term of this plan. This feedback will be received and addressed by NMC staff in charge of stewardship plan management.

## **8. Collection System and Consumer Accessibility**

The proposed plan would have no negative effect on residents in terms of the collection system and consumer accessibility because it relies wholly on the existing Recycle BC system to which residents are already well-accustomed. Specifically, the plan relies on section 4.4 “Collection of Packaging and Printed Paper from Residents and Streetscapes” of the current Recycle BC plan, which details the collection system for different types of residential dwellings in different areas.

The only possible effects that this plan could have on accessibility would be positive: newspaper compliance and participation may in turn result in Recycle BC's potential expansion of accessibility to currently waitlisted communities, as well as increased consumer awareness of the collection system that would result from newspaper-based promotion.

As noted previously, the arrangement in place between the NMC and the Government of BC that facilitates the collection of newsprint via the Recycle BC system is for a period of 5 years. NMC also recognizes that since it depends on Recycle BC, the proposed plan is subject to changes to the Recycle BC system resulting from, for example, new communities joining the program and potential future plan amendments.

## **9. Consumer Awareness**

Consumer awareness as it relates to this plan has already been largely established through Recycle BC's efforts to date. This will continue to be the case as Recycle BC's communication efforts and measurement of awareness is ongoing, as described in detail in section 4.9 "Communications" on pages 14 and 15 of their plan. Reliance on the Recycle BC plan would in turn be subject to any amendments to that plan as far as consumer awareness is concerned.

One element of the Recycle BC plan is to "Deploy an effective mix of communication and P&E tactics", in order to ensure residents are effectively exposed to messaging about the program. To further this end, newspapers plan to supplement Recycle BC's efforts with the same type of recycling promotion that we have been engaged in for many years. This includes featuring the recycling symbol on newspapers and running advertisements that promote the recycling and recyclability of newsprint to consumers.

As part of this plan, member newspapers will continue this practice, as well as running targeted promotion of the collection system available. Specifically, each Participating Producer under this plan will run a minimum of 2 such promotional pieces within the first 4 months following plan approval and implementation.

Advertising via newspapers is particularly appropriate when it comes to this stewardship plan because the communication is printed on the recyclable material itself and is directly targeted to the specific user of the product. This system is much more direct and efficient than trying to reach users via more general media such as radio and TV. As the newsprint product itself is a communication medium and this information will go directly to the user of the product, NMC does not anticipate using other media (TV, radio, etc.) for consumer awareness purposes, but will provide information via the NMC and member websites.

## **10. Management of Program Costs**

The Recycling Regulation Section 5(1)(c) requires that stewardship plans adequately provide for producers paying the costs of collecting and managing the product. Through the arrangement with the Government of BC and in turn Recycle BC, this plan meets this requirement.

The newspaper industry fully accepts the responsibility for collection and management of its product under the regulation, and will ensure that associated costs are paid for over the duration of the 5 year timeframe of this plan. No local governments or other producers will be paying for the collection and management of this material. There will be no accumulated reserves as fees will be assigned to producers according to their residential tonnage of newsprint distributed each year.

The temporary arrangement between NMC and the Government of BC, and the Government of BC and Recycle BC, results in Recycle BC being compensated at levels equivalent to fees currently paid by other newsprint producers that are members of Recycle BC such as producers of grocery flyers. NMC's direct contribution/payment against costs comes in the form of a combined cash equivalent in VIK advertising and direct cash payment to the Government of BC, as well as the incurrence of overhead and administrative NMC agency costs, and finally indirect contribution through complementary consumer awareness advertising. This approach is comparable with those in other Canadian jurisdictions and is considered reasonable given the role of newspapers in our society and the financial challenges currently faced by this industry.

## **11. Dispute Resolution**

This proposed plan involves relationships between NMC and its members, as well as NMC and the Government of BC. NMC does not foresee disputes arising given that there is a clear understanding between NMC members and the Government of BC, and because the NMC has strong relations with its members. That said, should any disputes arise, NMC will strive for amicable resolution. An arbitrated resolution mechanism would be utilized in the event that amicable negotiation is not successful.

By extension, this plan also requires relationships between the Government of BC and Recycle BC and between Recycle BC and their service providers. NMC will not become involved in any disputes between the Government of BC and Recycle BC, and the dispute resolution mechanism that Recycle BC already has established in their plan for dealing with their service providers is expected to be used for any such cases without NMC involvement.

## **12. Environmental Impacts**

From an environmental perspective, integrating the responsibility for newsprint collection and recycling with the existing Recycle BC program is the ideal system. This integration means that all PPP will be managed together, creating economies of scale in collection, processing and distribution of commodities that maximizes overall efficiency and in turn minimizes environmental impacts. Collecting multiple materials from households all at once will ensure reduced GHG emissions per tonne of PPP collected, as will consolidation of the distribution chain for the recovered commodity. Where applicable, a common depot system including newspaper will also result in reduced GHG emissions as it will allow consumers to take advantage of a single point of return.

Newsprint itself also has the added benefit of stable domestic processing capacity in the Pacific Northwestern United States. So where newsprint is collected by Recycle BC separately and/or where

sorting capability exists to extract newsprint from mixed paper, processors may be able take advantage of more local markets with lesser transportation requirements at Recycle BC's discretion.

With respect to the Pollution Prevention Hierarchy, section 5.4 (page 28) of Recycle BC's plan lays out their adherence to managing materials collected at the highest level possible, and this would include newsprint under this plan. At the highest level, "reduction" is not really an appropriate criterion for newsprint for reasons discussed earlier (i.e. newspapers are a product, not a package and reducing their volumes means having less of a valuable product). That said, similar to Recycle BC's environmental commitments, newspapers have changed to much lighter weight paper in recent years, as well as reducing page size in many cases, both of which have reduced environmental impacts without significantly compromising the newspaper product.

"Redesign" is another area where newspapers have made significant strides. For over 10 years now, many of BC's newspapers have been using high levels of vegetable-based inks free of all Volatile Organic Compounds (VOCs). The change to less toxic ingredients has made these newspapers much more environmentally friendly and 100% safe for reuse applications such as food wrap, pet-bedding and bin-lining. Under this plan, newspapers will continue to search for new and innovative redesign strategies such as this example to reduce the impacts of our products.

Following the exhaustion of the above efforts at the top of the hierarchy, all remaining material collected by Recycle BC would be managed at the "recycle the product" level. Newsprint has a number of unique characteristics that make it one of the most recycled and recyclable materials in the current PPP basket:

- It has a specific, consistent and high demand recycling application: new newsprint and magazines
- It has multiple, consistent mill buyers in the Pacific Northwest that ensure a recycling market for the recovered newsprint – even in the most depressed economic periods
- It is easy for residents to recognize and is traditionally sorted with minimal non-newsprint contamination
- It is made of a single material, rather than a composite, so does not have any plastic or metal attached to it and does not require more involved processes resulting in greater by-product
- It is in no way connected to food products, so carries no risk of residues or putrescible contamination entering the recycling system, as do many types of packaging

Residual waste or contamination coming from newsprint will therefore be minimal and recycling maximized within the Recycle BC system.

### **13. Performance Monitoring and Reporting Commitments**

Newsprint is a highly recognizable grade of fibre with a long history of successful recycling in BC, dating back to the late 1980s. Most BC residents are familiar with the Blue Box/Bag and other programs that have been used specifically for newsprint over the past decades and continue to be used in the Recycle BC collection system. Therefore NMC is confident that the transition to this plan would be seamless and the high degree of recycling maintained.

For reporting purposes, NMC will track all tonnages of newspaper distributed to the residential market in BC by member publications. In order to calculate a recovery rate, this tonnage will be divided by the tonnage of newspaper collected through the Recycle BC system, as determined by internal auditing of materials collected.

The *Recycling Regulation* requires that stewardship plans achieve a 75% recovery rate within a reasonable amount of time and NMC commits to maintaining the expectedly higher than 75% recovery rate calculated in the first year of the program, through the remaining duration of the plan. In other words, there will be no going backwards from the status-quo recovery rate for the newspaper-specific product itself once calculated.

Recycle BC will provide newspaper-specific collection tonnage information, which will count toward this plan's recovery target. This information will be communicated to NMC and will inform NMC's reporting, which will then be subject to third party audits for non-financial information, as per the Regulation and MoE guidance documents.

As a plan, other elements subject to performance measures will be monitored and reported on as they currently are by Recycle BC and their auditors, which will in turn inform reporting requirements for the NMC plan. These include measures pertaining to accessibility, operational and efficiency indicators, and overall resident awareness of the program as outlined in the Recycle BC plan section 5.5 "Reporting".

## Glossary of Terms and Abbreviations

**Contingency Plan / Stand-Alone Plan:** The outline in Appendix C that would take over from the initial stewardship plan at the end of the 5 year term in the event it is not extended

**NMC / News Media Canada:** The association representing Canadian print and digital media, and the manager of this stewardship plan

**ONP:** Recycling industry abbreviation for the newspaper material grade (“Old Newsprint”)

**Pollution Prevention Hierarchy:** The official waste management hierarchy of the BC Government, which ranks, from top to bottom: Reduce, Reuse, Recycle, Recovery, Residuals Management

**PPP / Packaging and Printed Paper:** The product category under Schedule 5 of the Recycling Regulation that covers packaging and printed paper, where printed paper “means 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 (a) other types of bound reference books, (b) bound literary books, or (c) bound text books.”

**Recovery Rate:** The rate, expressed in percentage form, calculated by dividing the amount of a material recovered by the total distributed

**Recycling Regulation:** The framework regulation under the Environmental Management Act that regulates product stewardship programs in British Columbia; product categories are separated into different “Schedules” which can be added via Order-In-Council

**Schedule 5:** The schedule of the Recycling Regulation that covers Packaging and Printed Paper

**VIK / Value in Kind:** A form of payment by provision of free newspaper advertising

## Appendix A: Performance Measures Summary

Performance Measure	2017	2018	2019	2020	2021/2022
<b>Recovery Rate</b>	At a minimum, maintain the current status quo recovery rate, whether the <i>Recycling Regulation</i> mandated 75% rate, or a higher rate if material audits during the first year of the plan show the status quo to be higher than 75%				
<b>Recovery Rate Reporting</b>	<ul style="list-style-type: none"> <li>Track tonnes of newspaper distributed to residential premises in BC by Participating Producers</li> <li>Utilize Recycle BC audit data on newspapers</li> <li>Break up tonnages distributed by Regional District as Recycle BC audit data allows</li> <li>Utilize Recycle BC audit data on newspapers collected to calculate and report on overall recovery rate for the province as a percentage, as well as detailed figures by Regional District and per capita where data allows; subject to third party assurance</li> </ul>				
<b>Consumer Awareness</b>	<ul style="list-style-type: none"> <li>Run targeted promotion of the Recycle BC collection system for newspaper, with a minimum of 2 promotional pieces from each member publication within 4 months of plan approval</li> </ul>	<ul style="list-style-type: none"> <li>Continue ongoing recycling promotion in BC newspapers</li> <li>Do consumer awareness survey in 2020 to gauge level of consumer awareness</li> <li>Rely on Recycle BC's ongoing communication campaigns and awareness tracking</li> </ul>			
<b>Accessibility</b>	<ul style="list-style-type: none"> <li>Rely on the approved Recycle BC plan's accessibility commitments to single-family, multi-family, depot, and, where applicable, streetscapes collection; this includes commitments for Recycle BC to report on accessibility levels throughout BC, and such accessibility will in turn be reported by NMC</li> </ul>				
<b>Pollution Prevention Hierarchy &amp; Environmental Impacts</b>	<ul style="list-style-type: none"> <li>Continue to make efforts where possible to reduce the environmental impacts of paper and inks used in newspaper production</li> <li>Ensure that at least 85% of inks used by Participating Producers in production of newspapers contain soy-based oil; achieve 95% by 2021/2022, assuming available supply</li> <li>Include specific messaging on sorting and clean newspaper recycling in ongoing promotion efforts</li> </ul>				

## Appendix B: Stewardship Plan Members

Following is a list of newspaper producers and affiliates (titles) currently represented by this stewardship plan; this list may expand in the case that additional newspaper publications wish to become part of it:

- Postmedia Network Inc.
  - The Vancouver Sun
  - The Province
  - National Post
  
- The Globe and Mail Inc.
  - Globe and Mail
  
- Black Press Group Ltd
  - 100 Mile House Free Press
  - Abbotsford News
  - Agassiz-Harrison Observer
  - Alberni Valley News
  - Aldergrove Star
  - Ashcroft-Cache Creek Journal
  - Barriere Star Journal
  - Bella Coola Coast Mountain News
  - Boulevard – Okanagan
  - Boulevard Chinese Edition
  - Boulevard Mid-Island
  - Boulevard Vancouver Edition
  - Boulevard Victoria
  - Boundary Creek Times
  - Burns Lake / Lakes District News
  - Campbell River Mirror
  - Canadian Grapes to Wine
  - Castlegar News
  - Chilliwack Progress
  - Clearwater Times
  - Cloverdale Reporter
  - Courtenay / Comox Valley Record
  - Cranbrook Daily Townsman
  - Cranbrook Kootenay News Advertiser
  - Creston Valley Advance
  - Duncan Cowichan Valley Citizen
  - Fernie Free Press
  - Fort St. James Caledonia Courier
  - Golden Star
  - Goldstream News Gazette

- Grand Forks Gazette
- Gulf Island Driftwood
- Haida Gwaii Observer
- Hope Standard
- Houston Today
- Indulge (Chinese/English)
- Indulge Magazine
- Invermere, The Valley Echo
- Kelowna Capital News
- Keremeos, The Review
- Kimberly Daily Bulletin
- Kitimat, Northern Sentinel
- Ladysmith-Chemainus Chronicle
- Lake Cowichan Gazette
- Langley Advance
- Langley Times
- Maple Ridge-Pitt Meadows News
- Mission City Record
- Monday Magazine
- N2K Magazine
- Nakusp, Arrow Lakes News
- Nanaimo News Bulletin
- Nelson Star
- North Delta Reporter
- Northern Connector
- Oak Bay News
- Parksville/Qualicum Beach News
- Peace Arch News, White Rock/South Surrey
- Penticton Western News
- Port Hardy, The Norther View
- Princeton, The Similkameen Spotlight
- Quesnel, Cariboo Observer
- Real Estate Weekly Abbotsford
- Real Estate Weekly Langley
- Real Estate Weekly Surrey
- Revelstoke Times Review
- Rossland News
- Saanich News
- Salmon Arm Observer
- Salmon Arm, Shuswap Market News
- Sicamous, Eagle Valley News
- Sidney, Peninsula News Review
- Smithers, Interior News
- Sooke News Mirror

- Summerland Review
- Surrey Now
- Surrey, North Delta Leader
- Terrace Standard
- Tofino-Ucuelet Westerly News
- Trail Daily Times
- Vancouver Island Free Daily
- Vanderhoof, Omineca Express
- Vernon, Morning Star
- Victoria News
- Williams Lake Advisor
- Williams Lake Tribune
- Wine Trails
- Winfield, Lake County Calendar
  
- Glacier Media Inc.
  - Business in Vancouver
  - Western Investor
  - Real Estate Weekly
  - Alaska Highway News
  - Pipeline News North
  - The Mirror
  - Northern Horizon
  - Prince George Citizen
  - Vancouver Courier
  - North Shore News
  - Burnaby Now
  - New Westminster Record
  - Richmond News
  - Delta Optimist
  - Tri-City News
  - Westender
  - Bowen Island Undercurrent
  - Squamish Chief
  - Whistler Question
  - Whistler Pique
  - Bridge River Lillooet News
  - Powell River Peak
  - Coast Reporter
  
- Sing Tao Newspapers (Canada 1988) Ltd.
  - Sing Tao Daily
  - Sing Tao Real Estate Guide
  - Entertainment Insider

- Sing Tao Weekly Magazine
- Canadian City Post
- Sing Tao Etel Directory

## Appendix C: Contingency Plan / Stand-Alone Plan

In the event that the plan proposed in this document is discontinued for any reason, NMC has prepared an outline for a Contingency / Stand-Alone plan for newspaper recycling in BC.

This section is being provided for information purposes only so that the Ministry and stakeholders can better understand NMC's potential long-term strategy. Consultation anticipates and welcomes comments on this Appendix in order to help further develop such a contingency plan, however it is important to be clear that it is only an outline of what the next stages may look like and is not an official plan that will be reviewed or approved by the MoE at this time. In the event it becomes necessary to implement, a more detailed version of the plan would be drafted utilizing preliminary feedback to date, then publicized, and subject to a full consultation and a government review process of its own.

### 1. Introduction

Under the Contingency plan, NMC will operate a stand-alone collection and processing system for members' newsprint in communities across BC.

### 2. Collection System Overview

The collection system under a stand-alone newspaper plan would be based on a number of components. First and foremost, in the interests of efficiency and utilization of existing infrastructure, the collection would utilize a "reverse distribution" system using local newspaper delivery drivers to pick-up Old Newsprint (ONP) curbside in all areas in BC that currently have curbside or multi-family recycling service. Other areas that currently use depots for newsprint recycling would be serviced in a similar fashion under this plan, through drop-off bins at depots, Newspaper Offices and other convenient locations that have room for bins and meet criteria of safety and accessibility.

This reverse distribution system would see collected newsprint returned back to a network of printers, distribution centres or directly to a recycling processing centre based on geographical and logistical considerations. For more remote areas, the system would utilize "backhauling" of recovered material in the trucks used to deliver newspapers. Baling and compaction would also be used as much as possible to maximize trucking efficiency.

The curbside system would make use of a "Green Bag" system similar to historical blue bags, which residents would use for their old newspapers. The bags would have instructions for use printed on them and would be distributed to every BC household currently receiving direct services. The costs associated with these bags will be partially offset by revenue sponsorship/advertising opportunities.

### 3. Benefits of a Stand-Alone Plan Exclusive to Newsprint

Implementing an exclusive plan for newsprint would have multiple benefits that make this an attractive option if necessary:

- **Collection Efficiency:** Newspapers have an exclusive and established residential distribution system in place already, and a "reverse-distribution" system would take advantage of the vehicles and drivers that currently deliver newspapers.

- **Material Quality and Market Value:** The system would be for newsprint only which would result in less contamination and a pure newsprint grade of material that would command higher market values as compared to mixed paper grades where newsprint is combined with other types of paper.
- **Reduced Processing Requirements:** Newspaper collected in an exclusive system would require very limited sorting (a capital-intensive and expensive part of the process for mixed materials), which would reduce processing costs and complexity.
- **Guaranteed Highest End Use:** Newsprint grades are typically used only for recycling back into new newspaper, flyers and magazine paper. This is preferable to newspaper being part of mixed paper grades which may be “down-cycled” into lower value products such as low-grade packaging, which are sold for lower prices and are less likely to be recycled again.
- **Active Domestic Markets:** There are multiple, active recycling mills in the Pacific Northwest that currently purchase recovered newsprint, ensuring that much of the newsprint is recycled within the region over and over. This is typically not the case for mixed paper grades which are virtually all exported to overseas markets for processing.
- **Charitable Benefit:** Newspaper Publishers will encourage and support charitable organizations to participate in the newsprint recycling plan (i.e. through newspaper drives, similar to bottle drives) and will share a portion of funds with local charities.

#### 4. Required Plan Elements per the BC Recycling Regulation:

The Recycling Regulation has a number of required elements for approved stewardship plans. The stand-alone plan for newspapers would address all of these areas.

##### 4.1 Product Recovery Targets

The Recycling Regulation requires that stewardship plans achieve a 75% recovery rate within a reasonable amount of time. Newspapers have long been at or above this collection target and that would continue to be the case under a stand-alone stewardship plan. Similar to the proposed plan, this 75% rate would be maintained under the stand-alone plan unless surpassed during implementation of the initial plan (a higher rate identified in the initial audit of actual newspaper recovery), any such higher rate would then become the baseline rate that would be maintained.

Most BC residents are familiar with blue box/bag programs that have been used specifically for newsprint over the past decades, and because NMC envisions a similar collection system (Green Bag), the same habits will be engaged and the transition should cause limited confusion. As a communication product, newspapers also have the added benefit of being able to communicate recycling information directly with consumers through print and digital promotion.

##### 4.2 Consultation

Due to the added complexity, consultation for a stand-alone plan would be an extended version of the plan under the initial 5-year scenario. It would involve publicizing the plan, conducting consultation by webinars, public meetings, and direct meetings with stakeholder associations and individuals. Specific attention would be paid to all impacted groups: local and regional governments, newspaper producers, the public, industry associations, First Nations and environmental groups. Participation and input from

consultations would be fully documented, reviewed and where appropriate incorporated to become part of the final plan submission.

#### **4.3 How Producers Will Bear the Costs of Collection and Recovery**

Members under this plan will report and submit their volumes of newsprint distributed in BC to NMC, which will in turn be responsible for invoicing the newspaper owners for the net cost of the collection system based on tonnage, collecting funds and paying service providers and other costs of running the program.

The resale value of newsprint will cover a significant portion of the costs of the system. Newsprint will be separated after collection, and generate a higher resale price and revenue, making the system more economically efficient.

#### **4.4 Reasonable and Free Consumer Access to Collection Facilities**

The reverse-distribution collection system guarantees that everyone receiving newspaper delivery will enjoy the same convenience on the collection side. The proposed system of depot/community collection for areas without curbside guarantees accessibility for all areas where newspapers are distributed.

#### **4.5 Consumers Awareness**

Consumer awareness will be very simple to achieve under a stand-alone plan because the newspapers can communicate all necessary information directly to the consumer through promotion on the newspapers themselves. This communication will be targeted and ongoing, and may also be supplemented via our newspapers' online websites. Collection containers (Green bags for households, larger bins for depot and drop off bins), will also feature information on the system.

#### **4.6 Assessing Performance**

A stand-alone plan under NMC will adhere to the annual reporting requirement as laid out in the *Recycling Regulation*, with report detail to include:

- Summary of collection system activity (curbside and depot/drop-off)
- Tonnages distributed and collected by region and per capita
- Summary of communication efforts and consumer awareness levels
- Details on challenges and solutions, efforts made to manage the costs and environmental impacts of the stewardship plan
- Summary of material audit results

#### **4.7 Dispute Resolution Procedure**

NMC will work to strive for amicable rather than legal resolution to any and all disputes whether they be with residents or service providers. Arbitrated resolution would be a mechanism utilized in the event that amicable negotiation is not successful.

#### **4.8 Life Cycle Management of Products**

The environmental impacts of newspaper recycling will continue to be minimal under this plan as they have been under similar systems throughout the years. Impacts will be less on account of the reverse distribution system and various other environmental benefits as described previously.

#### **4.9 Product Management as per the Pollution Prevention Hierarchy**

As it has for many years, the newspaper industry will continue to find ways to light-weight our product as well as make its production more environmentally sustainable through redesign. All remaining newsprint collected will be recycled for new newsprint and such, corresponding to the “Recycle the product” level of the hierarchy, with negligible amounts of (mainly contaminated) product directed to the lower energy recovery and disposal levels of the hierarchy.

## Appendix D: Consultation Summary

News Media Canada partnered with a professional communications firm to carry out the consultation program for this stewardship plan. The program consisted of 3 webinar presentations with opportunity for live questions as well as an email address where questions and comments could be sent at any time throughout the consultation period. NMC conducted the webinars on July 20<sup>th</sup>, August 16<sup>th</sup> and September 8<sup>th</sup>, which were accessible to any and all interested stakeholders including members of the public. The webinars were well-attended, with 59 participants across the 3 sessions including strong representation from:

- government (local, regional and provincial)
- the newspaper industry
- the waste and recycling industry
- other sectors

The presentation from the webinars was also made available online along with the plan, to encourage further comment. Between the webinars and emails, a total of 13 questions/comments were received. Each of these is documented and addressed as appropriate in the table to follow.

Industry Sector	Question / Comment	Response	Change to Plan Submission
<b>Municipal Government</b>	Will Recycle BC depots be required to have separate collection containers for newspapers, or will newspapers continue to be part of Category 1 - Printed Papers?	NMC will rely on the Recycle BC Plan for collection.  NMC anticipates no changes to current collection systems or categories.	No change
<b>Municipal Government</b>	What about the plastic bags and elastics that newspapers are often delivered with?	The plastic is covered by the plan as it is widely accepted for recycling by local depots.	Plan amended under “Section 4: Definition of Newsprint”
<b>Municipal Government</b>	What will happen to the non-Recycle BC collection systems that exist now for some community newspapers or in large urban areas that requested it?	NMC anticipates no changes to current collection systems.	No change
<b>Municipal Government</b>	Will News Media BC reimburse either the Province or Recycle BC for the three years of stewardship activities that were provided to newspapers before this plan?	This is the arrangement and the process that all three parties have agreed to. NMC will not be reimbursing for any activities prior to 2016.	No change
<b>Regional Government</b>	Will there be funding subsidies provided through News Media Canada Stewardship Plan to local governments that are not able to be in contract with or approved by Recycle BC, for their recycled PPP?	It is not NMC’s intention to subsidize any local governments that do not currently have a contract with Recycle BC. The arrangement is between NMC and the Province, and the Province and Recycle BC so it would be solely Recycle BC’s decision on further expanding PPP collection areas.	No change
<b>Municipal Government</b>	How will you know what percentage of material recycled is from News Media Canada stewards versus the materials that will come from flyers that this program is not responsible for?	NMC is responsible for reporting on the volume that its BC members generate yearly.  Recycle BC would have information provided by all producers on material	No change

		generation, as well as audit data on the composition of material collected. The newspaper-specific tonnage determined by these audits would be the numerator to calculate the recovery rate.	
<b>Municipal Government</b>	If Recycle BC is providing all of the collection and recycling service as well as public awareness and auditing, why not partner with them and ensure they are fairly paid for the services?	<p>The NMC plan is not dissimilar to others that create their own stewardship plan that integrates with existing EPR infrastructure and services.</p> <p>NMC has negotiated with the Province of BC directly as the Province was in a position to take full advantage of a VIK-style system as used in other Canadian provinces, because they are a large user of newspaper advertising.</p>	No change
<b>Municipal Government</b>	Why not pay fees in for awareness programs and then use those funds to buy media ads to avoid issues of getting ads on the back page or if the benefit goes to the province, to make sure that the ads are used to increase collection of materials and not some other government program?	NMC BC members will work actively to support awareness through ads run its publications. NMC as with other producers want the infrastructure to work and be efficient. It is in NMC's interest to support Recycle BC with ads that are meaningful and well placed in its papers, supporting a variety of initiatives including information, instructions and facts about recycling newsprint. NMC will control the ads and their placement and ensure that they are effective.	No change
<b>Newspaper Industry</b>	Please explain the relationship between News Media Canada, the Province of BC and Recycle BC as it relates to the plan.	NMC will provide a combination of cash and VIK payments to the Province of BC for a five-year term. With the savings incurred, the Province of BC will then compensate Recycle BC for newspaper recycling services for the same term.	No change

<b>Newspaper Industry</b>	How will News Media Canada pay for the collection and distribution of newspapers to be recycled?	Per above through the agreement with the Province of BC.	No change
<b>Regional Government</b>	Page 5, 6. Stewardship Agency Responsibilities: “Material collection at curbside, multi-family buildings, depots and streetscapes (where applicable).” Based on prior experience with public space recycling, it is likely that take-out food containers, coffee cups, and newspapers are a significant portion of the materials discarded on streetscapes. What role is News Media Canada intending to play in the roll-out of streetscape collection of PPP?	NMC would rely on the Recycle BC Plan to provide streetscape collection of PPP, and newspapers specifically, on our behalf.	No change
<b>Regional Government</b>	Page 7, 10. Management of Program Costs: “No local government or other producers will be paying for the collection and management of this material.” How does News Media Canada intend to demonstrate this? Many local governments say that the Recycle BC market-clearing price does not cover all of their costs.	NMC has confidence that the cash and VIK agreement with the Province adequately covers these costs to Recycle BC.  NMC cannot comment on the Recycle BC market clearing price for services.	No change
<b>Regional Government</b>	Page 16, 2. Collection System Overview “The curbside system would make use of a “Green Bag” system similar to historical blue bags, which residents would use for their old newspapers.” Implementing an additional collection mechanism, especially one that isn’t integrated with existing municipal garbage, organics and recycling collection may lead to resistance and/or confusion among residents. Have residents been consulted about this potential plan?	This question refers to an element in the Contingency / Stand-Alone plan in Appendix C, which will be consulted on in more detail should NMC pursue this option in the future. That said, NMC did consult with the public through a survey completed in May 2014 and the findings of this survey were that residents were not resistant to separating newsprint as this is a long established practice across BC.	No change

*Thank you*

