

Packaging and Printed Paper Stewardship Plan

November 19, 2012

Updated February 25, 2013

Updated April 8, 2013

Updated November 28, 2016



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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 curbside²⁰ 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.

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;

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, except as described below, MMBC is not required to implement a competitive procurement process or provide curbside collection in the jurisdiction, and is not responsible for providing reasonable access to curbside collection of PPP within that local government's jurisdiction. Local governments that later wish to join the MMBC program can ask to be added to a waitlist as per the process described further in this section.

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.

As part of its annual performance and accessibility review, MMBC will evaluate the performance of the PPP collection system in relation to MMBC's currently established 75% annual recovery target and accessibility performance objectives (Section 5.2, pg. 22) and will add waitlisted collectors (those that originally declined or failed to respond to the market-clearing price) to the MMBC collection system as required to deliver these objectives.

Collectors interested in joining the MMBC program (those that originally opted out of MMBC service, or those that were not originally eligible) can ask to be added to a waitlist. MMBC will assess the need to expand its collection system on an annual basis and will take commercially reasonable steps to meet recovery targets and accessibility performance objectives in the subsequent year, taking into consideration, without limitation:

- collectors that have expressed an interest in joining MMBC's collection system and that are able to:
 - deliver collection services in areas identified as having insufficient collection service to meet accessibility performance objectives, in accordance with MMBC's Collector Qualification Standards, and the terms of the Master Services Agreement and Statement of Work;
 - contribute to MMBC's recovery target; and
 - contribute to the efficiency and effectiveness of MMBC's collection system;
- the ability to modify post-collection service provider agreements to add new collectors and more tonnes of PPP; and

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- the timeline to execute agreements with collectors prior to finalizing MMB's operating budget for the following program year.

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, except as described below, MMB will not be responsible for providing reasonable access to collection of PPP to multi-family buildings serviced by the local government. Local governments that later wish to join the MMB program can ask to be added to a waitlist as per the process described further in this section.

As part of its annual performance and accessibility review, MMB will evaluate the performance of the PPP collection system in relation to MMB's currently established 75% annual recovery target and accessibility performance objectives (Section 5.2, pg. 22) and will add waitlisted collectors (those that originally declined or failed to respond to the market-clearing price) to the MMB collection system as required to deliver these objectives.

Collectors interested in joining the MMB program (those that originally opted out of MMB service, or those that were not originally eligible) can ask to be added to a waitlist. MMB will assess the need to expand its collection system on an annual basis and will take commercially reasonable steps to meet recovery targets and accessibility performance objectives in the subsequent year, taking into consideration, without limitation:

- collectors that have expressed an interest in joining MMB's collection system and that are able to:
 - deliver collection services in areas identified as having insufficient collection service to meet accessibility performance objectives, in accordance with MMB's Collector Qualification Standards, and the terms of the Master Services Agreement and Statement of Work;
 - contribute to MMB's recovery target; and
 - contribute to the efficiency and effectiveness of MMB's collection system;
- the ability to modify post-collection service provider agreements to add new collectors and more tonnes of PPP; and
- the timeline to execute agreements with collectors prior to finalizing MMB's operating budget for the following program year.

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 MMB. MMB 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 underserviced 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 underserviced areas.

As part of its annual performance and accessibility review, MMBC will evaluate the performance of the PPP collection system in relation to MMBC's currently established 75% annual recovery target and accessibility performance objectives (Section 5.2, pg. 22) and will add waitlisted collectors (those that originally declined or failed to respond to the market-clearing price) to the MMBC collection system as required to deliver these objectives.

Collectors interested in joining the MMBC program (those that originally opted out of MMBC service, or those that were not originally eligible) can ask to be added to a waitlist. MMBC will assess the need to expand its collection system on an annual basis and will take commercially reasonable steps to meet recovery targets and accessibility performance objectives in the subsequent year, taking into consideration, without limitation:

- collectors that have expressed an interest in joining MMBC's collection system and that are able to:
 - deliver collection services in areas identified as having insufficient collection service to meet accessibility performance objectives, in accordance with MMBC's Collector Qualification Standards, and the terms of the Master Services Agreement and Statement of Work;
 - contribute to MMBC's recovery target; and
 - contribute to the efficiency and effectiveness of MMBC's collection system;

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.

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- the ability to modify post-collection service provider agreements to add new collectors and more tonnes of PPP; and
- the timeline to execute agreements with collectors prior to finalizing MMBC's operating budget for the following program year.

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

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.

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

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

The producers that are members of MMBG 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.

MMBG, 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-

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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 toxic components and increasing energy and resource efficiency	<ul style="list-style-type: none">Initiatives undertaken by individual producersPPP Stewardship Plan encourages reduction 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 producersPPP Stewardship Plan encourages redesign through cost allocation
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 producersPPP 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 requirementsMMBC 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

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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:
 - 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.

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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;
- 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

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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.

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;

⁴⁷ The Consultation Summary is provided in Appendix C.

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- 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.

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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 ^{47 48}	# of Households Receiving Garbage Curbside Collection Service (no PPP curbside collection) ⁴⁹	# of Multi-Family Households	# of Multi-Family Households Receiving PPP Collection Service ^{50 51}
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

⁴⁷ 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.

⁴⁸ 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 until MMBC completes its annual performance and accessibility review (Pg. 23) and determines that a local government on the waitlist should be added to the MMBC program.

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 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.

⁵⁰ 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.

⁵¹ 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 until MMBC completes its annual performance and accessibility review (Pg. 24) and determines that a local government on the waitlist should be added to the MMBC program.

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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 ^{47 48}	# of Households Receiving Garbage Curbside Collection Service (no PPP curbside collection) ⁴⁹	# of Multi-Family Households	# of Multi-Family Households Receiving PPP Collection Service ^{50 51}
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 ^{47 48}	# of Households Receiving Garbage Curbside Collection Service (no PPP curbside collection) ⁴⁹	# of Multi-Family Households	# of Multi-Family Households Receiving PPP Collection Service ^{50 51}
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 Measure

Measures	2014	2015	2016	2017	2018	2019	2020	2021	2022
Recovery Target	Annually 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). ⁵²			Consult on and submit targets to achieve a 75% recovery rate.					
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				Annually 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.					

⁵² 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

⁵³ 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.

⁵⁴ **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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	Annually provide depot collection of PPP for the approximately 17,000 multi-family households currently without depot collection service. ⁵⁵							
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.				

⁵⁵ 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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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. 					
Pollution Prevention Hierarchy Performance	Target PPP for which recycling end-markets exist for collection. ⁵⁶	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. ⁵⁷					
	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					

⁵⁶ 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.

⁵⁷ 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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		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. 					

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Appendix D – Producer Members of MMBC

A total of ~~787~~ 1295 producers are currently members of have signed Letters of Intent with MMBC as of April 5 December 3, 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 have joined MMBC 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, stewards@multimaterialbc.ca.

MMBC will respond to queries directed to producers@multimaterialbc.ca, stewards@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

0881380 BC LTD	Andersen's Nursery Ltd
0976288 B.C. LTD.	Anderson Watts Ltd.
2Brilliant Media Inc	AndrewPeller Ltd
3M Canada Company	Angel Bakery Ltd
458858 BC LTD	Angel Seafoods Ltd
49th parallel	Anitas Organic Grain & Flour Mill
579732 B.C. LTD DBA Ross Chocolates	Apex Branded Solutions Inc
7-Eleven Canada, Inc.	Apotex Inc.
A&W Food Services of Canada Inc.	Apple Canada Inc.
A. Bosa & Co. Ltd.	Aquilini Development and Const.
A. LASSONDE INC.	Arby's Restaurant Group Inc
A.E. Mckenzie Co ULC	Arc'teryx Equipment Inc.
A.J. Floral Wholesale	Ardene Holdings Inc.
Abbott Diabetes Care	Aritzia LP
Abbott Laboratories	Arla Foods Inc
AbbVie Corporation	Army & Navy Dept. Store Ltd.
Abby Pharmacy	Art Knapp
Absorbent Products Ltd	Askew's Food Service Ltd
Ace Bakery	Askew's Foods (Sicamous) Ltd
Acer America Corporation	ASM Canada Inc
ACH Food Companies Canada	Associated National Brokerage Inc.
Actavis Pharma Company	Associated Veterinary Purchasing
Actavis Specialty	AstraZeneca Canada Inc.
Actegy Limited	ATKINS NUTRITIONALS INC.
Actelion Pharmaceutiques Canada Inc	Atlantia
Acushnet Canada Inc	ATRON ELECTRO INDUSTRIES INC.
Adidas Canada Limited	Aurora Importing & Distributing
Advanced Nutrients Ltd.	Auto Control Medical
Advantage Sales and Marketing	Avalon Dairy Ltd
AG Professional Hair Care Products	Aventix Animal Health Corp
Agropur Coopérative	Aviva Canada Inc.
Air Canada Vacations (Touram)	AW Holdings Corp
Airway Surgical Appliances Ltd	Axel Kraft International Limited
Alberto Pharmacy #2	AZ Trading Co. Ltd.
Albion Fisheries Ltd,	Azuma Foods (Canada) Co., Ltd.
Alcon Canada Inc.	B & G Foods Canada, ULC
Aldergrove Credit Union	BakeMark Canada
All 4 Water	Bank of Montreal
All Market Inc.	Bank of Nova Scotia
All Treat Farms Ltd	Barnston Island Herb Corporation
Allergan, Inc. (Canada)	Barriere IDA Pharmacy
Alliance Mercantile Inc.	Basalite Concrete Products - Vancou
Alpha Health Products Ltd	Basics Office Products Ltd.
Altex Decoration Ltd	Bath and Body Works (Canada) Corp
Amazon Canada Fulfilment Services	Bausch & Lomb Canada Inc.
American Eagle Canada Inc	Bayard Canada
American Standard	Bayer Inc
AMG Medical Inc.	BC Assessment
Amway Canada Corporation	BC Fresh Vegetables Inc.

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BC Housing
BC Hydro
BC Transit
BC Tree Fruits Cooperative
BCBG Max Azria Canada Inc.
BD Canada Ltd
BDI, a Division of Bell Mobility In
Beachcomber Hot Tubs Inc
BEAN SPROUT KING
Beauty Systems Group (Canada) Inc.
BeaverTails Canada Inc.
Becton Dickinson Canada Inc
Bed Bath & Beyond Canada L.P.
Behr Process Canada Ltd.
Beiersdorf Canada Inc
Belcam Inc
Belich's Market Ltd.
Bell Canada
Bellisio Food Canada
Belvedere International Inc.
Belz Enterprises Ltd
Ben Moss Jewellers Western Canada
Benjamin Moore & Co., Limited
BenQ Canada Corp
Bento Sushi
Bergen Farms Berries Ltd
Best Buy Canada Ltd
Better Buy Market Ltd et al dba Sho
Bevo Farms Ltd.
BG Health Group Inc.
BIC INC.
Big Mountain Foods
Bioforce Canada Inc
Birks & Mayors Inc.
Biscuits Leclerc
Blackwell Dairy Farm Inc.
Blistex Ltd
Bloomstar Bouquet
Blue Mountainvineyard and Cellars
Blue Ruby Jewellery
BlueShore Financial
BMW Canada Inc.
Boathouse Row Hamilton Inc-o/a
BOATsmart! Canada
Body Plus
Boehringer Ingelheim Canada Ltd.
Boiron Canada Inc.
Bonduelle Canada Inc
BOSE LIMITED
Boshart Industries Inc.
Boston Pizza International Inc.
BouClair Inc
Boulangerie Vachon Inc.
Boutique La Vie en Rose
Brad Davie
BRANDS UNLIMITED TRADING INC
Brar Natural Flour Milling BC Inc.
Breeze Adera Projects Ltd.
Bremner Foods Ltd
Breville Canada L.P.
Bridgers Trading Ltd.
Bristol Myers Squibb Canada Co
British Columbia Automobile Associa
British Columbia Ferry
British Columbia Lottery Corporatio
British Columbia Pension Corporatio
Brockmann's Chocolate
Bron and Sons Nursery Inc
Brother Intl Corp (Canada) Ltee
Browns Shoes Inc.
Brutus Beverages Inc.
BSH Home Appliances Ltd.
BSN Medical Inc
Bugaboos Eyewear Corp
Bulk Barn Foods Limited
Bulkley Valley Credit Union
Burger King Restaurants of Canada
Burnaby Lake Greenhouses
Burnbrae Farms Ltd.
Bush Brothers & Company
Buy-Low Foods LP
Bylands Nurseries Ltd.
C & C Growers Inc
C & E Canada Inc.
C. B. Powell Limited
Cabela's Retail Canada Inc.
Caffe Artigiano
Caffe Umbria Canada
Cal-Ell Imports Ltd.
Calkins & Burke Ltd.
Campbell's Company of Canada
Canada Bread Company, Limited
Canada Dry Mott's Inc
Canada GardenWorks Ltd
Canada J&H Galaxy Investment Manage
Canada Wide Media Limited
Canadelle
Canadian Choice Wholesalers
Canadian Geographic Enterprises
CANADIAN HOME PUBLISHERS
Canadian Thermos Products Inc
Canadian Tire Corporation LTD

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Canadian Valley Growers Ltd.	COATS & CLARK CANADA
Canadian Woodworking/Sawdust Media	Coca-Cola Refreshments Canada
CANDA SIX FORTUNE ENTERPRISE CO. LT	Colgate-Palmolive Canada Inc
Canner Nurseries Ltd.	Coloplast Canada Corporation
Canon Canada Inc.	Columbia Manufacturing Co. Ltd.
Canpresso Products	Columbia Sportswear Canada LP
Canterbury Coffee Corporation	Comark Inc.
Canus Goat's Milk Skin Care Product	Community Savings Credit Union
Capital One Bank	ConAgra Foods Canada Inc.
Cara Operations Limited	Conair Consumer Products Inc
Cardinal Meat Specialist Limited	Concert Properties Ltd.
Care Holdings Inc.	Concord Sales Ltd
Carlson Wagonlit Travel	Conglom Inc.
Carlton Cards Limited	Connoisseur's Kitchen Inc.
CASA CUBANA/SPIKE MARKS INC.	Convert-Pac of Canada Ltd.
Cascades Tissue Group	Copperside Foods Ltd.
Castle Cheese (West) Inc.	Coranco Corporation Limited
Catelli Foods Corporation	Corinthian Distributors Ltd.
Cates Medicine Centre	Costco Wholesale Canada Ltd.
Cavalier Foods Ltd.	Cott Beverages Corporation
Cavendish Farms	Cottage Life Media
Cawston Cold Storage Ltd.	CounselTron Ltd.
CCD INTERNATIONAL	Countryside Farms Ltd
TRADING&MARKETING	Covic International Trading Inc
Centura Brands Inc	Crate and Barrel Canada Inc.
Century 21 Canada LP	Crayola Canada
Certainteed Gypsum Canada Inc	Credential Financial
Chalifour Canada	Creekside Custom Foods
Chamion Alstoe Animal Health Inc.	Crofters Food Ltd.
Champ's Mushrooms Inc	Crosby Molasses Co Ltd
CHELTON HOUSE PRODUCTS, INC	Cryopak Industries (2007) ULC
Chemac Industries	CTBC Bank Corp. (Canada)
Chenchiam, Inc.	CTG Brands Inc.
Choice Hotels Canada Inc	CTT Group
Chung Hing Co. Ltd	Curtis International Ltd
Church & Dwight Canada	Custom Building Products
CIBC	D Dutchmen Dairy Ltd.
Cineplex Entertainment Ltd Part	Dairy Queen Canada Inc.
CinnabarValley Farms Ltd	Dakota Trading Corporation
Cinnzeo	Danamex Trade Ltd.
CKF Inc.	Danby Products Ltd
Claire's Stores Canada Corp.	Dan-D Foods Ltd
Clarins Canada Inc	Daniadown quilts Ltd.
Clearview Horticultural Products	Danier Leather Inc.
Clearwater Convenience Ltd	DaNone Inc
Clover Leaf Cheese Ltd.	Dare Foods Limited
Clover Leaf Seafoods Company	Dart Canada Inc.
Cloverdale Paint Inc.	Darvonda Nurseries Ltd.
Coalision Inc.	David Chapman's Ice Cream Ltd.
Coast Capital Savings Credit Union	David Oppenheimer and Company
Coastal Community Credit Union	Daybreak Farms

Packaging and Printed Paper Stewardship Plan

Delca Enterprises Ltd	Elias Honey Ltd
Delicious Dim Sum	Elite Linen Inc.
Dell Canada Inc.	Elizabeth Arden (Canada) Ltd
Denny's Canada	Elman's Food Products Ltd.
Destination British Columbia	Elmer's Products Canada Limited
DeVry Greenhouses Ltd.	EMD Serono Canada Inc.
Direct Value Wholesale	Emerson Electric Canada Limited
Directplus Foodgroup	Endymion Holdings
Discovery Islands Organics Ltd.	Enerex Botanicals Ltd.
Diva International Inc	Energizer Canada Inc
Dixon Ticonderoga Inc.	English Bay Batter L.P.
DLC Distributors Inc.	English Bay Blending
DM Cakes Etc	Envirogard Products Limited
Dole Packaged Foods Company	Estee Lauder Cosmetics Ltd.
Dollar Tree Stores Canada	Estevan Pharmacy Ltd.
Dollarama L.P.	Ethical Bean Coffee Company
Dolly's Delicious Treats	European Creations
Domino's Pizza of Canada Ltd.	Euro-Pharm International Canada Inc
Domtar Inc	Eurosa farms Ltd.
Donald's Fine Foods	EVERYWARE GLOBAL INC.
DOUBLE D BEVERAGE CO.	Exemplar Horticulture Ltd.
Double Happiness Foods (2007) Ltd.	Expedia CruiseShipCenters
Dovre Import & Export Ltd	Export Packers Company Ltd.
Dr. Oetker Canada Ltd	FABRICLAND PACIFIC LTD
Duraflame	Fairfield Tree Nurseries Inc.
Dusos Fresh Pasta	FAIRWAY MARKETS
Dynamic Paint Products Inc	Falesca Importing Ltd.
Dynamite Stores inc.	Falkland Store Ltd.
Dyson Canada LTD.	Far East North America Food Ltd.
E.D. Smith Foods, Ltd	Farafena Direct Trade Inc.
E.I. du Pont Canada Company	Farleyco Marketing Inc.
Earth's Own Food Company Inc.	Farmcrest Foods
Earthcare Marketing Sales Ltd.	Far-Met Importers Ltd
East Kootenay Community Credit Union	Fazio Foods International Ltd.
Eat Well Ethnic Foods Inc.	FCA Canada Inc.
Eatmore Sprouts & Greens Ltd.	Federated Cooperatives Ltd
Eaton Industries (Canada) Company	Fehrkon Enterprises Ltd.
ECCO Shoes Canada Inc.	Fellowes Canada Ltd.
Echo Brand Management	Ferrero Canada Ltd.
Ecotrend Ecologics	Ferring Inc
Eddie Bauer of Canada Corporation	FGC Foods
Eddi's Wholesale Garden Supplies Lt	FHC Enterprises LTD
Edgewell Personal Care Canada ULC	FIJI Water Canada Ltd
Edible Arrangements International	Fine Choice Foods Ltd.
Edma Marketing Ltd	First Credit Union
EDOKO FOOD IMPORTERS LTD	First West Credit Union
Elco Fine Foods Inc.	Fit Foods Ltd
Electrolux Home Products	Florists Supply Inc.
Electrolux Major Appliances Canada	Fok's Trading (Canada) Ltd.
Electronic Boutique Canada	Foley's Candies
Eli Lilly Canada Inc.	Food First Enterprises Ltd.

Packaging and Printed Paper Stewardship Plan

Foot Locker	Glutenull Bakery
Foothills Creamery Ltd.	GOJO Canada
For Good Measure	Golden Boy Foods Ltd
Ford Motor Co of Canada Ltd	Golden Valley Foods Ltd.
Forever 21	Goodfellow Inc.
Fort NelsonPharmacy	Gourmet Baker Inc
FortisBC Energy Inc.	Grafton-Fraser Inc.
Fountana Beverage Corp.	Grand & Toy Limited/Grand & Toy Lim
Frank T. Ross & Sons	Gray Monk Cellars Ltd
Fraser Valley Duck and Goose	Great Canadian Dollar Store (1993)
Fraserland Organics Inc	Greater Vancouver Community Credit
Fred Deeley Imports Ltd.	Green Planet Wholesale
FreeFall Literary Society of Calgar	Green Shield Canada
FRESH DIRECT PRODUCE LTD	Greenfield Produce Ltd.
Fresh Hemp Foods Ltd.	Greenhouse Delight Foods Inc.
Fresh Is Best Salsa Company Inc	Greenstar Plant Products Inc.
FRESHPACK OKANAGAN FRUIT LTD	Grindrod Grain Company Inc.
Freshpoint Vancouver, Ltd.	Groove Nutrition
Freud Canada, Inc.	Groupe Marcelle Inc
FREUDENBERG HOUSEHOLD PRODUCTS	Groupe Seb Canada
Freybe Gourmet Foods	Growers Supply Company Limited
Frito Lay Canada	GS FOOD LTD.
Fruits & Passion Boutiques Inc.	Guess? Canada Corporation
Fujifilm Canada Inc	Gulf & Fraser Fishermen's Credit Un
Future Harvest Development Ltd.	H.Y. Louie Co. Limited
GAGAN FOODS INTERNATIONAL LTD	H & B Investments Ltd. / Lakeview M
Galderma Canada Inc.	H J Heinz Company of Canada LP
Gap Canada	H&M Hennes & Mauritz Inc
Garant GP	H&R BLOCK CANADA, INC.
Garden Protein International	H. A. Kidd and Company Limited
Gates Canada Inc	Hachette Distribution Services
Gay Lea Foods Co-operative Limited	Hain Celestial Canada ULC
GB Micro Electronics Inc.	Half-Moon Foods Manufacturing Ltd.
GE Lighting	Hall Telecommunications Supply
General Mills Canada Corporation	Hallmark Canada
General Motors of Canada Company -	Hamilton Beach Brands Canada Inc
Genuine Health Inc	Han Ka Export-Import ltd.
George's Cream Inc.	Hana Foods Inc
Georgia-Pacific Canada	Hanahreum Mart Downtown Inc.
GEOX Canada Inc	Hanahreum Mart Inc.
Gibbs Nortac Industries Ltd.	Hanahreum Mart Langley Inc.
Gildan Apparel (Canada) LP	Hanahreum Mart Richmond Inc.
Ginger Beef Choice Ltd.	Hanna International Sales Inc.
Give and Go Prepared Foods Corp	HapiFoods Group Inc.
Gizella Pastry ltd	Happy Planet Foods Inc.
Glaswegian Enterprises Inc.	Hardy Buoys Smoked Fish
GlaxoSmithKline Consumer Healthcare	Hardy Sales Ltd.
GlaxoSmithKline Inc.	Harker's Organics & Rustic Roots Wi
Glentel Inc.	HARLEY-DAVIDSON CANADA LP
Global Trading Network Ltd.	Harmonic Arts Botanical Dispensary
Global Upholstery Co. Inc.	Harry Rosen Inc.

Packaging and Printed Paper Stewardship Plan

Hart Drugmart
Hartz Canada, Inc.
Harvest Meats (Div of Premium Brand
Hasbro Canada Corporation
HEALTHSIDE PHARMACY
Helen of Troy Inc
Henkel Canada Corp - Consumer
Henkel Consumer Goods Canada Inc.
Heritage Credit Union
Hermes Canada Inc.
Hershey Canada Inc.
Hi Pro Feeds LP
High Liner Foods Inc.
HILARY'S SALESMASTER INC
Hills Foods Ltd
Hill's Pet Nutrition Canada Inc.
Hitachi Koki Canada Co
Hitfar Concepts
HMV Canada Inc.
HOFFMANN-LA ROCHE LIMITED
Holland Imports Inc.
Hollshop Imports
Holt Renfrew & Co., Limited
Home Depot of Canada Inc.
Home Hardware Stores Limited
HoMedics Group Canada Co
Honda Canada Inc
Horizon Distributors Ltd
horn enterprises ltd
House of Marley, LLC
Houweling's Tomatoes
HP Canada Co.
HP Hood LLC
HPI HEALTH PRODUCTS INC.
HQ Fine Foods
HSBC Bank Canada
Hubbell Canada LP
Hudson's Bay Company
Huer Foods Inc
Hung Fung Noodle Ltd.
Hunter Douglas Canada Ltd Part
Husqvarna Canada Corp.
Hyundai Auto Canada Corp.
ICBC
Icebreaker Merino Clothing Inc.
I-D Foods Corporation
Ideal Security Inc.
Idelle Labs, Ltd.
IKEA Canada Ltd Partnership
illy Espresso Canada
Imperial Tobacco Canada Ltd
Indianlife Food Corporation
Indigo Books & Music Inc.
Industrial Thermo Polymers Limited
Ingram Micro Inc.
INNOVATIVE TECHNOLOGY
Inovata Foods Corp.
Inspiring Media Inc.
Intact Insurance
Interior Savings Credit Union
INTERNATIONAL CLOTHIERS INC.
international Cosmeticare Inc.
Intervet Canada Corp.
Invesco Canada Ltd.
Investors Group Financial Services
IPD Canada Inc
Irving Consumer Products Limited
Island Farmhouse Poultry Ltd
Island Independent Buying Group
Island Savings Credit Union
Islandway Sorbet Canada
Italpasta Limited
ITW Permatex Canada,
J.L. FREEMAN S.E.C.
Jack Link's Canada Company
Jaguar Land Rover Canada ULC
Jam Industries, Ltd
Jamieson Laboratories Ltd
Jamieson's Pet Food Distributors Lt
Jan K. Overweel Limited
Janes Family Foods-Sofina Foods Inc
Janome Sewing Machine Co., (Canada)
Janssen Inc.
Jascor Housewares Inc.
JD Farms 2010 Ltd
JD Sweid Foods (2013) Ltd.
JELD-WEN of Canada
Jericho Pharmacy
Jet Group
JET TRADING CO., LTD
Jiva organicsmfg&dist inc
JJ Bean Inc.
JNK FOOD MANAGEMENT LTD
John Deere Canada
Johns Manville Canada
Johnson & Johnson Inc
Johnson & Johnson VisionCare, Inc.
Johnson Level and Tools Inc.
Johnston Drug Wholesale Ltd
Johnston's Butcher Shop Ltd
Johnvince Foods
Joy Chinese Dim Sum

Packaging and Printed Paper Stewardship Plan

JP Morgan Chase Bank	Laticrete International Inc
JTI-Macdonald Corp	LB Maple Treat Corp.
Judy G Foods Inc	Le Chateau Inc.
JVC Canada Inc.	Le Kiu Importing Co. Ltd
K+S Windsor Salt LTD	Lee Valley Tools Ltd.
Kan's Gourmet Foods Inc.	Lee's Food Products Limited
KAO Canada Inc. (Jergens	Leese Enterprises
KATE SPADE CANADA INC	Left Coast Naturals
Katz Group Canada Inc	Legal Services Society
Kaycan Ltd	LEGO Canada Inc
Kaz Canada, Inc.	Lekker Foods Distribution Ltd
Kellogg Canada Inc	Lenovo (Canada) Inc.
Ken's Foods Inc	Leo Pharma Inc
Kernels Popcorn Limited	Les Chocolats Vadeboncoeur Inc.
Kerrisdale Cameras Ltd.	Les Croissants d'Olivier Ltd.
Kerrisdale Pharmacy	Lesaffre Yeast Corporation
Keurig Canada Inc.	Lesley Stowe Fine Foods
KHELA ORCHARDS LTD.	Level Ground Trading
Kia Canada Inc	Lexmark Canada Inc.
Kicking Horse Coffee Col Ltd.	LG Electronics Canada Inc
Kidde Canada Inc	Liberté Brand Products Co
Kimberly-Clark Inc.	Libra National The Rice People
Kitchening & Co. Fine Foods Ltd.	LifeScan Canada,
Kleen Flo Tumbler Ind. Ltd.	Life-Time Sales Ltd.
Knape & Vogt Canada Inc.	Lillooet's Finest Water Co Ltd
Knowledge Network Corporation	Lilydale-Sofina Foods Inc.
Kobian Canada Inc	Lin Haw International Co., Ltd.
Kodak Canada ULC	Lindt & Sprungli (Canada) Inc.
Kodiak Group Inc	Line Centric Group
Kohl & Frisch Limited	Lise Watier Cosmétiques Inc
Koocanusa Publications Inc	Little Caesar of Canada Inc.
Kootenay Markets Ltd.	LITTLE QUALICUM CHEESEWORKS
Kootenay Savings Credit Union	Loblaw Companies Limited
Korea Exchange Bank of Canada	L'Occitane Canada
Kraft Canada Inc.	Locin Industries Ltd
KriNos Foods Canada Ltd	L'Oliveriae Quality Whole Foods Inc
Krown Imports	London Drugs Limited
Kruger Products L.P.	Lordco Parts LTD
KY TRADING	L'Oreal Canada Inc.
La Cie McCormick Canada Co.	Lowcost Western Pharmacy #1 & #2
La Grotta Del Formaggio	Lowes Canada
lake breeze vineyards	Loyalty One, Inc
Lake View Credit Union	Lu & Sons Enterprise Ltd.
Lakeland Flowers Ltd	Lululemon Athletica
Lakeside Pharmacy	Lundberg Family Farms
Land O'Lakes Inc	Lush Handmade Cosmetics Ltd.
Landmark Medical Systems Inc	Luxottica Retail
lang	M&M Meat Shops Ltd.
Lantic Inc. Vancouver Refinery	Macdonald's Prescriptions Ltd
Larosa Fine Food Inc.	Macs convenience stores inc.
LaSalle College Vancouver	Maddies Natural Pet Products Ltd

Packaging and Printed Paper Stewardship Plan

Magtar Sales Inc.
Majestic Seafood Products (2002) In
Make Scents Flower Distributors Inc
Makita Canada Inc.
Mama Hogg's Grilled Caesar Salad Dr
Manrex Ltd.
Manulife Financial
MAPEI INC
Maple Hill Farms
Maple Leaf Foods Inc
Maple Leaf Garden Centre
Mapleville Import Export Inc
Marc Anthony Cosmetics Inc
Mario's Gelati Ltd.
Maritime Travel Inc
Mark Anthony Group Inc.
Mark-Crest Foods Ltd
Marlane Enterprises Ltd
Mars Canada Inc
Mary Kay Cosmetics Ltd.
Masco Canada Limited
Master Lock Company
Matrix Magazine
Mattel Canada Inc
Max Voets Coffee Roasting LTD
Mazda Canada Inc.
MC COMMERCIAL INC.
McCain Foods Canada
McCarthy and Sons
McCaughhey Consumer Products
McDonald's Restaurants of Canada
Mckesson Canada
MD Financial Management Inc.
Mead Johnson Nutrition (Canada) Co.
Meadow Valley Meats
Meadowfresh Dairy Corp
Medela Canada Inc
Medicine Shoppe #169
Medisca Pharmaceutique
Medline Canada, Corporation
MedTech Products Inc.
Mega Trading
Melitta Canada Inc.
Merangue International Limited
Mercedes-Benz Canada Inc.
Merck Canada Inc.
Merisant US Inc
Merit Travel Group Inc.
Merz Pharma Canada
Mexico Trading Co Ltd
Mexycan Trading (1992) Inc
Michaels Stores, Inc.
Microsoft Corp.
MIDWAY INDUSTRIES LTD
Miele Ltd.
Mint Pharmaceuticals INC
Minter Country Garden
Misty Mountain Industries Ltd.
Mitsubishi Motor Sales of Canada, I
Modern Dog Inc
Moen
Mondelez Canada Inc
Morgan Williams West
Morinda Canada Co
MORRIS NATIONAL INC.
Mother Parkers Tea & Coffee Inc.
Mouat's Trading Co Ltd
Mountain Equipment Co-op
Mr G Stores Ltd
Mr. Lube Canada LP
MTF Mainland Distributors
MTI - MOBILTECH INTERNATIONAL INC
MTY Tiki Ming Enterprises
Munchkin Baby Canada Ltd.
Munros Sorrento Prescriptions
Murchie's Tea & Coffee (2007) Ltd.
Mylan Pharmaceuticals ULC
Nanaimo Recycling Exchange
Nash Produce
NATIONAL BANK OF CANADA
National Importers Canada ltd.
National Money Mart Company
National Smokeless Tobacco Co. Ltd.
Natural Factors Nutritional
Natural Pastures Cheese Co. Ltd.
Naturally Homegrown Foods Ltd.
Naturally Splendid Ltd.
Nature's Fare Markets
Nature's Path Food Inc.
Nature's Way Of Canada Ltd
Nautilus Lifeline Ltd
Nearly Famous Enterprises Inc.
Neatfreak Group Inc
Nehemiah Manufacturing Company
Nelson & District Credit Union
Nemcor Inc.
Neoring Holdings Ltd
Nespresso Canada
Nestle Canada Inc.
Nestle Purina PetCare
Nestle Waters Canada
New Era Nutrition Inc.

Packaging and Printed Paper Stewardship Plan

NEW WORLD DISTRIBUTORS

New Zealand Lamb Company Ltd
Newell Rubbermaid Canada
NIKON CANADA INC
Nine West Canada, LP
Nintendo of Canada
Nissin Foods (USA) Co Inc
Nongshim America, Inc
Nordic Nurseries Ltd
North American Produce Sales
North Peace Savings and Credit Union
Northern Cherries Inc.
Northern Gold Foods Ltd.
Northern Savings Credit Union
Northstar Pharmaceutical Inc
Northwest Food Products Ltd
Novartis Consumer Health Canada
Novartis Pharmaceuticals Canada
Novo Nordisk Canada Inc.
Nufora Foods Inc
NutraEx Food Inc.
O.C. Tanner Recognition Co Ltd
Oatey Canada
Ocean Brands GP
Ocean Spray International Inc
OK Tire Stores Inc
Okanagan Grown Produce Ltd
old country design
Old Dutch Foods Ltd.
Olymel S.E.C.
Olympic Dairy Products Inc
Omer DeSerres Inc.
OMG's Candy
Omron Healthcare Canada
onosgreenhouses Ltd
Opus Framing Ltd
Organika Health Products Inc
Osram Sylvania Ltd.
Overwaitea Food Group
Pace Processing & Product Developme
Pacific Blue Cross / BC Life
Pacific Coast Home Products Inc.
PACIFIC RIM INTERNATIONAL BROKERAGE
Page One Publishing Inc
Paladin Labs Inc
Pan Pacific Pet Limited
Panago Pizza Inc.
Panasonic Canada Inc.
Pandora Jewelry LTD
PaperChef Inc.
Paradise Island Foods Inc.

Parissa Laboratories Inc.
Parmalat Dairy & Bakery Inc
Party City Canada Inc.
Payless Shoesource Worldwide, Inc.
PBF Pita Bread Factory Ltd
Peachtree Marketing Inc.
Penguin Meat Supply Ltd.
Pentel Stationery of Canada Limited
Peoples Drug Mart
Peoples Drug Mart #168
peoples drug mart 122
Peoples Drug Mart 180
Peoples Drug mart 72
peoples pharmacy 372
Peoples Pharmacy 379
Pepsi-QTG Canada,
Perfect Plastics Inc.
Perfect Pop
Perfetti VanMelle Canada Ltd
Pet Valu Canada Inc. dba Bosleys
Petcurean
PETM Canada Corporation
Pfizer Canada Inc
Pfizer Consumer Healthcare
PGI Market On 5th
Pharmasave Drugs (National) Ltd.
Pharmasave Drugs Pacific Ltd.
Pharmascience Inc
Pharmasystems Inc.
PHILIPS ELECTRONICS LTD.
Pier 1 Imports
Pierre Fabre DermoCosmétique Canada
Pine House Bakery Enterprises Ltd.
Pioneer Electronics of Canada Inc.
PLANTRONICS
Plasti-Fab Ltd.
Platinum Naturals Ltd.
Post Foods Canada Corp
Potters Farm & Nursery Inc.
PPG Architectural Coatings Canada
Prabu Foods Inc
Prairie Naturals
Pranin Organic Inc
Prelam Enterprises Ltd.
Premier Tech Home & Garden Inc.
Prestilux Inc.
Primo Foods Inc.
Princess Auto
Pro Organics
Procter & Gamble Inc.
Prospera Credit Union

Packaging and Printed Paper Stewardship Plan

Province of British Columbia	Rostdown Natural Foods Ltd
Prym Consumer Canada Inc	Rothmans, Benson & Hedges Inc.
PSC Natural Foods	Royal BC Museum
PTI Foods	Royal Canin Canada Company Inc
punjab milk foods inc	Rubie's Costumes Company
Pure Foods Corp.	Running Room Canada Inc.
Pure Integrative Pharmacy	RW Packaging Ltd.
Puresource Inc.	S Boudrias Inc
Purica	S.C. Johnson & Son Ltd.
Purity Life Health Products Limited	S.K. Wan Enterprises Ltd.
PVH Canada, Inc.	Sabra Canada Inc.
Quadrant Cosmetics Corp.	Saje Natural Business Inc.
Quails' Gate Vineyards Estate	Salmo Drugs Ltd.
Quality Foods	Salt Spring Coffee
Quikrete Canada Holdings, Limited	Salton Appliances (1985) Corp
Rainbow Greenhouses Inc.	Samsung Electronics Canada Inc
Ralph Lauren	Samtack Inc
RBC Financial Group	San Remo Food importers Ltd.
RC Purdy Chocolates Ltd	Sanofi Consumer Health
Reckitt Benckiser (Canada) Inc	Sanofi-Aventis Inc
Recochem Inc.	Santa Maria-Sofina Foods Inc
Regal Confections Inc.	Santevia Water Systems Inc.
Regency Medicine Centre	Saputo Dairy Products Canada G.P.
REHA Enterprises Ltd.	SASCU Financial Group
Reinhart Foods Ltd	Savary Island Pie Company
Reitmans (Canada) Limited	SBC Firemaster Ltd
Remington Medical Equipment Ltd.	SCANDINAVIAN TOBACCO GROUP CANADA
Renee's Gourmet Foods Inc	Scentuals Body Care From Nature
Renew Life Canada Inc	Schwartz Chemical Corporation
Renewal Wellness	Scott Plastics Ltd
Renfro Canada Corp.	Scott-Bathgate Ltd
Renova-Fábrica de Papel do Almonda	Scotts Canada Ltd.
Resers Fine Foods	Sears Canada Inc
Resort Reservations Whistler	Select Brand Distributor's Inc.
Revlon Canada Inc.	Select Ready Foods Inc.
Reynolds Consumer Products Canada I	Seoul Trading Crop
RICHARDSON OILSEED	Sephora
Richelieu Hardware Ltd.	serious coffee
Rimports (Canada) Ltd.	Seven Seas Fish Co. Ltd.
Robert Bosch Inc.	SFM Enterprises Ltd
Roche Diabetes Care	SHAC Environmental Products Inc.
ROGERS' CHOCOLATES LTD	Shafer-Haggart Ltd.
Rogers Communications Canada Inc	Shaklee Canada Inc.
Rogers Foods Ltd.	Sharons Credit Union
Rogers Publishing Limited	Sharp Electronics of Canada Ltd
Roland Canada Ltd.	Shaw Communications Inc.
Rolf C. Hagen Inc.	Shaw Creek Farm
Rollover Premium Pet Food Ltd	Shell Canada Products
RONA inc./Ace Canada	Shirra Panwest
Ronsons Shoe Stores Ltd.	Shiseido (Canada) Inc
Roots Organic Inc.	Shop Vac Canada Ltd.

Packaging and Printed Paper Stewardship Plan

Shoppers Drug Mart Inc.
Sierra Mountain Inc
Simmons Canada Inc.
Simply Computing Inc.
Simply Delicious
Simply West Coast
SISU Inc.
skoah
SKP Plant Factory Inc
Smucker Foods of Canada Co
Snap-on Tools of Canada
Snow Cap Enterprises
Snowcrest Foods Ltd.
Sobeys
Sobeys Ontario
Sobeys West
SodaStream Canada Ltd.
Sofina Foods Inc
SoftMoc Inc.
Solutions 2 GO Inc.
Sonray Sales Ltd.
Sony Computer Entertainment Canada
Sony Music Entertainment Canada Inc
Sony Of Canada Ltd.
Soo Jerky Ltd
Sopar International
Soprema Canada Inc.
South St. Burger Co.
Spectrum Brands Canada, Inc.
Sperling Holdings Ltd
Spicers Canada ULC
Spin Master Ltd
Sprott Shaw (CIBT Ed Group)
St. Joseph Media Inc
Staedtler-Mars Limited
STANDARD PRODUCTS INC.
Stanley Black & Decker - CDIY Canad
Staples Canada
Star Marketing Ltd.
Star Produce
Starbucks Coffee Canada, Inc.
STATE BANK OF INDIA (CANADA)
Staub Electronics LTD
Stella Pharmaceutical Canada Inc.
Stemtech Canada Inc.
Stihl Limited
Storck Canada Inc.
Storex Industries
Subaru Canada, Inc.
Subway Franchise Systems Canada,Ltd
Sugarplum Desserts Ltd.
Summerland & District Credit Union
Summerland Medicine Centre
Summerland Sweets Ltd
Summit Specialty Foods Ltd.
Sun Life Assurance Co of Canada
Sun Products Canada Corporation
Sun Rich Fresh Foods Inc.
Sunbeam Corporation Canada Limited
Suncor Energy Products Partnership
Sun-Maid Growers of California
Sunovion Pharmaceuticals Canada Inc
Sunrise Markets Inc. dba Sunrise So
Sunrise Poultry Processors Ltd
Sun-Rype Products Ltd.
Sunshine Coast Credit Union
Sunshine Market
Sunstar Americas Inc
Suntech Optics
Sunwing Vacations Inc.
Surlang Pharmacy
Surrey Meat Packers Ltd.
Suzuki Canada Inc.
SUZY SHIER
Swan Lake Nurseryland
Swan Products Canada Ltd
SWAROVSKI CANADA LTD
Synnex Canada Limited
T&T Supermarket Inc
T-2 Market recycle Depot
TAI WAN FOOD PRODUCTS LTD.
Tak Fung Enterprises Co. Ltd
Takeda Canada Inc.
TallGrass Distribution
Taplow Ventures Ltd
Targus Canada Ltd.
Taro Pharmaceuticals Inc.
Tartine Tarts Inc.
Task Tools
TASTY TREAT FOODS LTD
Tata Global Beverages Canada Inc
TAYMOR INDUSTRIES LTD.
T-Brothers Food & Trading Ltd
Techdata Canada Corporation
Tele-mobile Telus Mobility
Tender Corporation
Terra Breads Retail Inc
Terra International Food Inc.
TerraLink Horticulture Inc.
Teva Canada Limited
Texas Instruments Canada Ltd
TFB & Associates Limited

Packaging and Printed Paper Stewardship Plan

TFI Foods Ltd
Thai United Food Trading Ltd.
The Aldo Group Inc.
The Allan Candy Company Limited
The Brick Warehouse Corporation
THE CAMBRIDGE TOWEL COMPANY INC
The Central Drug Stores Ltd.
The Children's Place
The Clark Companies
The Clorox Company of Canada Ltd.
The Cora Franchise Group Inc.
The Corporation of the Village of S
The Dominion of Canada General
The Economical Insurance Group
The Empire Life Insurance Company
The Flight Shops, Inc
The French's Food Company
The Great-West Life Assurance Co
The Hillman Group Canada ULC
The Juice Plus Company Canada Inc.
The Mentholatum Co of Canada Ltd.
The Minute Maid Company Canada Inc.
The Original Cakerie Ltd
The Pampered Chef Canada Corp.
The Pepsi Bottling Group
The Pie Company British Columbia
The Produce Terminal
The Second Cup Coffee Co.
The Sherwin-Williams Company
The Shopping Channel-a Div of
The Source (Bell) Electronics Inc.
The Standard Life Assurance Company
The TDL Group Corp - Tim Hortons
THE TORONTO-DOMINION BANK
Thermor Ltd.
Things Engraved Inc.
THOMAS & BETTS LIMITED
Thomas Fresh Inc.
Thomas Haas Chocolates & Patisserie
Thomas Reid Farms Ltd
Thomas, Large & Singer Inc.
THRIFTYS INC. (2005)
Ti Foods
Tilley Endurables Inc
Tomm's Management Holdings Inc.
Toppits Foods Ltd.
TOPS Products Canada
Toshiba of Canada Ltd
Tosuta International
Totes-Isotoner Canada Ltd
Tourism Vancouver (GVTA)

Town Shoes Limited
Toyo Importing Co. Ltd.
Toyota Canada Inc
Toys 'R' Us Canada Ltd.
Trader Media Corporation
TRAIL APOTHECARY LTD
Trail Appliances
TransCold Distribution Ltd (BC)
Transcontinental Inc.
TransLink
Transportation Investment Corporati
Tran-Western Distribution Ltd.
Tree of Life Canada Inc
Trends
Trimax Sports Inc.
Tri-Vic Enterprises Ltd.
Trophy Foods Inc.
Tru Value Food Centre Ltd
Trudell Medical International
TruServ Canada Inc.
TT Group Limited
Tubify
Tun Hau Enterprises (Canada) Ltd
TVA Publications Inc
Twinings North America
UAP INC
Ultima Foods Inc
UNFI CANADA INC (Grocery West)
UNFI Canada Inc. (Central)
Unicity Canada, Ltd.
Unico Inc.
Unilever Canada Inc.
Unilever India Exports Limited
uniPHARM Wholesale Drugs Ltd.
Unisource Canada Inc.
Uprising Breads Bakery
Urban Barn
Urban Harvest Organic Delivery
US Cotton
USANA CANADA
USP Canada Inc.
V.I.P. Soap Products Ltd
Valleybrook Gardens Ltd.
Value Drug Mart
Value Village Stores
Valvoline Canada
Van Noort Bulb Co. Ltd.
Vanbelle Nursery
VANCAST INVESTMENTS LTD.
Vancouver City Savings Credit Union
Vancouver Community College

Packaging and Printed Paper Stewardship Plan

Vancouver Island Farm Products
Vancouver Island Produce Ltd.
VantageOne Credit Union
Vector Marketing Canada Corporation
Vega Sequel Naturals
Velux Canada Inc
Venosan Canada Inc.
Ventures International Products Inc
Vetoquinol N.-A. Inc.
Vibrant Health Products Inc.
Victoria Pharmacy Group
Victorian Epicure Inc
Village Farms Canada LP
Vintage Brands Limited
Virbac Canada, Inc.
Vita Health Products Inc.
Vogue International
Volkswagen Group Canada Inc.
Voortman Cookies Limited
VTech Technologies Canada Ltd
W. Ralston (Canada) Inc.
W.T. Lynch Foods Limited
Wakefield Canada Inc
Wal-Mart Canada Corp.
Want A Cookie
Warehouse One Clothing Ltd.
Water Pik Inc
Watson Gloves (John Watson Limited)
WD-40 Company (Canada) Ltd.
WDDC
Weddel Limited
Wedderspoon Organic Inc.
Wee Wud
Weight Watchers Canada, Ltd
Welcome Wagon Ltd.
Wendy's Restaurants of Canada Inc.
West 49 Inc./Amnesia
West Coast Floral Growers & Distrib
west coast review publishing societ
West Coast Toy Ltd.
Westbank Projects Corp.
Western Foods
Western Rice Mills Ltd
Western Water Farms and Gardens
Westminster Savings Credit Union
Weston Foods (Canada) Inc
Westpoint Distributors Ltd.
Whalen LLC
Whirlpool Canada LP
Whistler Blackcomb
White Spot Limited
WhiteWave Foods
Whole Foods Market
Wholly Noggin Foods Ltd
Williams Lake and District Credit U
Williams Sonoma Canada Inc
Willow Point Peoples Drug Mart #123
Windset Farms
Wineland Dressings
WINGTAT GAME BIRD PACKERS INC
Winnable Enterprise Co. Ltd.
Winners Merchants International L.P
WN Pharmaceuticals Ltd.
WorkSafeBC
World Kitchen Canada (EHI Inc.)
WrapZone Restaurants
Xerox Canada Ltd.
X-Lite Canada Inc
Yamaha Canada Music Ltd.
Yamaha Motor Canada Ltd.
Yamato Trading Co. Ltd.
Yellow Pages Digital & Media Soluti
Yellow Pages Homes Limited
YM INC. (SALES)
Zinetti Food Products Ltd
Zoetis Canada Inc
Zwilling J.A. Henckels Canada Ltd.