



March 3, 2023

Reference: 17073

Tamara Burns
Executive Director Western Canada
Recycle BC
171 Esplanade West, suite 230
North Vancouver, BC V7M 3J9

Sent via email: tburns@recyclebc.ca

Dear Tamara Burns:

Thank you for submitting the October 4th, 2022, Curbside Adjacency Criteria Amendment (the amendment) proposing to amend Recycle BC's Packaging and Paper Product Extended Producer Responsibility Plan (the plan) in fulfillment of the requirements of subsection 5(1)(c)(iii) of the Recycling Regulation (the regulation), made under the *Environmental Management Act*.

I acknowledge the efforts of Recycle BC towards continuous improvement to provide a sound basis for ensuring the program's success going forward. As noted in my preliminary decision letter, I note one deficiency in the proposed amendment that must be addressed.

As you are aware, the director has the ability to both amend an approved Extended Producer Responsibility (EPR) plan on their own initiative, and to approve amendments to an approved plan that have been proposed by a producer. Prior to the issuance of this decision letter, Recycle BC was provided with a preliminary decision letter for the amendment on December 15th, 2022, and has had the opportunity to propose further amendments or provide additional information for consideration by January 15th, 2023. Although Recycle BC missed the deadline to provide a response, I understand EPR staff met with you on February 15th, 2023, to discuss the intent of the amendment and gain clarity on expectations associated with my proposed amendment.

Having taken that information into account, I have completed my review of the amendment to the plan and note an area of deficiency with regard to meeting the criteria for approval set out in subsection 5(1)(c)(iii) of the regulation (reasonable and free consumer access to collection facilities or collection services).

Please be advised that, pursuant to subsection 5(5) of the regulation, I approve the Curbside Adjacency Criteria Amendment, proposed October 20th, 2022, and in addition to the amendments proposed by Recycle BC, and approved by me in this letter, I am further amending the plan, pursuant section 5(5) of the regulation. To address the deficiency of subsection 5(1)(c)(iii), I am amending the plan by replacing the following text that provides context to the criteria, which I approve, in section 3.2 of the proposed amendment:

Replacing:

“PPP curbside collection service providers included in the Recycle BC program are eligible to service adjacent non-municipal areas provided each of the following criterion are met”

With:

“Areas outside municipal jurisdictions that are adjacent to existing PPP curbside collection service areas included in the Recycle BC program are eligible to be serviced under the Recycle BC program provided each of the following criterion are met”

This amendment reflects the language originally proposed by Recycle BC on August 4, 2022, in its first submission of the amendment. This alteration is to reflect the intent of the regulation in which Recycle BC, as the producer-appointed agency, is responsible for the collection of regulated products covered by the plan and does not pass this responsibility on to local governments or service providers.

Thank you for your efforts and I appreciate the industry’s continued commitment to achieving compliance in this regard.

Sincerely,

A handwritten signature in black ink, appearing to read 'Laurel Nash', written in a cursive style.

Laurel Nash
Assistant Deputy Minister
Environmental Protection Division



RECYCLEBC™

Recycle BC

New Curbside

Curbside Adjacency Criteria Amendment

August 2022

Revised October 20, 2022

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SECTION 1: Introduction

1.1 Project Objective

Section 4.3.5 of the Recycle BC Program Plan outlines eligibility criteria for new curbside collection programs in municipalities. The Ministry of Environment and Climate Change Strategy (MOECCS) subsequently requested that Recycle BC expand that definition to include an equivalency definition for unincorporated areas, which was approved in late 2021.

Recycle BC also committed in the Program Plan to “...assess the feasibility of servicing smaller, densely populated communities of less than 5,000 residents that are immediately adjacent to an existing curbside service area, with the same requirement for curbside garbage collection...” The objective of this project was to develop the curbside adjacency criteria.

1.2 Project Background

During development of Recycle BC’s latest five-year Program Plan, which began in 2017, the Ministry of Environment and Climate Change Strategy (MOECCS) requested Recycle BC provide clear criteria for new curbside collection programs and consult on that definition. Recycle BC completed this work and provided the following definition in its revised Program Plan:

4.3.5 New Curbside Programs

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

- *A curbside garbage collection program was in place for a minimum of two years in advance of the new curbside program for the same households;*
- *The community represents an incorporated municipality; and*
- *The community has a minimum population of 5,000 residents.*

The MOECCS subsequently requested that Recycle BC expand that definition to include an equivalency definition for unincorporated areas. Recycle BC proposed the following amendment language for Section 4.3.5 New Curbside Programs in its Stewardship Plan, which was approved in 2022:

Regional Districts are eligible to join the Recycle BC program as contracted collectors if they implement a PPP curbside collection program in one or more unincorporated areas, provided each of the following criteria are met:

- *The proposed service area has a minimum population of 5,000 residents;*
- *The proposed service area has a minimum household density of 0.42 households/hectare;*
- *There is a maximum distance of 20 km between proposed Service Area Sections; and*
- *A curbside garbage collection program is in place for a minimum of two years in that service area.*

For clarity, the following definitions are provided:

- **Minimum household density:** Defined as total occupied dwellings divided by total hectares in proposed service area, excluding non-populated areas (parks, crown lands, etc.) and areas not proposed to be serviced;
- **Maximum distance:** Calculated by the distance of navigable roads from respective edges of service area sections, with a maximum number of three gaps greater than 10 km up to a maximum 20 km in distance between service area sections. Island and ferry accessed communities are considered a single service area and must meet all criteria independently; and
- **Curbside garbage:** Program must be managed by the local government proposing service.

This revised eligibility criteria applies only to unincorporated areas and only to newly proposed service areas, not to expansion of service areas of existing Recycle BC collectors. By August 31, 2022, Recycle BC will propose further amendments to the program for adjacency criteria.

Recycle BC also committed in the Program Plan to “...assess the feasibility of servicing smaller, densely populated communities of less than 5,000 residents that are immediately adjacent to an existing curbside service area, with the same requirement for curbside garbage collection...”

This report will serve as a companion document to the Program Plan, outlining the amendment for curbside adjacency.

1.3 Adjacency Definition

The revised eligibility criteria for new curbside service within the Recycle BC program (curbside adjacency criteria), as an outcome of the methodology, analysis and consultation, is defined as:

PPP curbside collection service providers included in the Recycle BC program are eligible to service adjacent non-municipal areas provided each of the following criterion are met:

- The proposed adjacent area has a maximum population of 4,999 residents;
- The proposed adjacent area has a minimum household density of 0.42 households/hectare;
- There is a maximum distance of 5 km between the existing curbside service area included in the Recycle BC program and the proposed adjacent area; and
- A curbside garbage collection program is in place in the proposed adjacent area or scheduled to launch no later than coinciding with the introduction of PPP curbside collection.

For clarity, the following definitions are provided:

- PPP curbside collection service providers may include any of the following:
 - Recycle BC, as the provider of curbside collection service in a direct service area adjacent to the proposed adjacent area; and

- A local government providing curbside collection service in a service area adjacent to the proposed adjacent area, utilizing either in-house collection staff, a private contractor, or a sub-contract with another applicable level of government.
- Minimum household density: Defined as total occupied dwellings divided by total hectares in proposed service area, excluding non-populated areas (parks, crown lands, etc.) and areas not proposed to be serviced;
- Maximum distance: calculated by the distance of navigable roads between the edge of the existing service area and the proposed adjacent area;
- Curbside garbage: Program must be managed as a coordinated service directly by an applicable First Nation, municipality or Regional District and excludes subscription service whereby households' contract with one or more collection contractors directly.

SECTION 2: Adjacency Project

To develop eligibility criteria for new curbside service for areas that are adjacent to an existing curbside service area, Recycle BC used Census data, local government data as submitted, as well as Recycle BC's own data, to provide the most accurate view available for calculations and analysis. This first stage of the project is described below in 2.1 Methodology.

Following this stage, the relevant assembled data was used to calculate density by households per hectares. The calculations and analysis are described in 2.2 Analysis and Results. Recycle BC selected the weighted average of the two least dense municipal types within incorporated municipalities across BC as the proposed density threshold. Additionally, Recycle BC determined through analysis (and feedback through the consultation process) that a maximum distance of 5 km between an existing curbside service area included in the Recycle BC program and the proposed adjacent area was reasonable definition of adjacency.

The adjacency project also included a stakeholder consultation process, which is outlined below in 2.3 Consultation and Feedback. This section outlines how stakeholder comments were solicited and addressed.

Finally, the project concluded with the proposed adjacency definition parameters presented to the Recycle BC Board of Directors for approval to submit to the MOECCS August 2022, with an updated version provided October 2022 after feedback from the MOECCS. Upon approval by the MOECCS of the proposed amendment, it will be posted on the Recycle BC website in the Amendment companion document to the Program Plan and offers will be distributed to applicable local governments within 60 days. A minimum period of 6 months will be required between a local government accepting the offer and onboarding into the program.

2.1 Methodology

1. Density Data Assembly

- Recycle BC used Statistics Canada's Census to assemble the relevant data to compare Census Subdivisions (incorporated municipalities) to designated Unincorporated Places in the province (i.e., regions of land not governed by a local municipal corporation);

- Census data files used included:
 - Census Division (CD) – Regional Districts
 - Census Subdivision (CSD) – Incorporated Municipalities
 - Population Centre (POPCTR)
 - Designated Place (DPL) – Unincorporated Place
 - Private dwelling occupied by usual residents (Total Occupied Dwelling).
- Recycle BC data used included:
 - Household counts
 - Collection tonnage
 - Capture rates
- Supplied Regional District data used included:
 - Regional information on population and household counts.

2. Mapping

- Recycle BC defined and mapped possible adjacent areas near existing curbside service areas to achieve density measurements and consider the distance requirements between existing curbside service areas and possible adjacent areas.

3. Data Usage

- The relevant assembled data was used to calculate density by households per hectares as well as the distance requirements between existing curbside service areas and possible adjacent areas.

2.2 Analysis & Results

1. Density Requirement

- Five Census Category types were considered for this analysis: City, Town, Village, District Municipality, and Island Municipality;
- The density components used were:
 - Households = total occupied dwellings;
 - Hectares = total hectares in proposed service area excluding non-populated areas (parks, crown lands, etc.) and areas not proposed to be serviced; and
 - Median = the middle value in a definition.
- Households/Hectare was selected as the equivalency comparator for consistency in approach; and
- Median was selected versus mean or weighted average as the equivalency comparator. It was determined through analysis that mean or weighted average was affected to a greater extent by the density of the largest cities and towns than by using median average.

2. Density Calculation

- Median Average calculation was used to select the representative figure under each Category Type:
 - Formula: Median = $\{(n + 1) \div 2\}^{\text{th}}$ value.
- The Median formula was used to determine the representative number for each incorporated municipality category (City, Town, Village, District Municipality, and Island Municipality). The list was filtered for each of the municipal categories, then sorted by

ascending order from smallest to largest before the formula was applied. If the total count ('n') was an even number, the average was taken from the middle two values.

3. Mapping (Maximum Distance)

- From the mapping methodology (2.1.2 above), the function of the analysis was to determine a reasonable maximum distance between an existing curbside service area included in the Recycle BC program and the proposed adjacent area; and
- Recycle BC analyzed distance gaps between Service Areas and adjacent areas with reasonable density to determine a reasonable distance.

4. Results

- The table below shows the median density by type of municipality calculated using Statistics Canada data;

Municipality Type	All BC: Households/Hectare
City	2.54
Town	2.90
Village	0.55
District Municipality	0.45
Island Municipality	0.30
District/Island Municipality Combined	0.42

- Recycle BC selected the weighted average of the two least dense municipal types as the proposed density threshold (.42) for unincorporated areas, which corresponds with the density requirement included in Recycle BC's curbside equivalency amendment; and
- Additionally, Recycle BC determined through analysis and consultation that a maximum distance of 5 km between an existing curbside service area included in the Recycle BC program and the proposed adjacent area was reasonable.

2.3 Consultation & Feedback

1. Consultation Process

- The draft curbside adjacency criteria was distributed to all local government curbside collectors on April 29, 2022, which included an invitation to a webinar consultation event on May 12, 2022;
- 36 people attended the webinar, including:
 - 21 from Regional Districts;
 - 9 from Municipalities;
 - 3 from First Nations;
 - 3 from the MOECCS; and
 - 1 from Other.

- Recycle BC presented in PowerPoint format the project overview, current curbside equivalency criteria, methodology development and results, definitions, and the proposed adjacency criteria. Next steps and a question period closed the consultation webinar.
2. Feedback
- 14 verbal and 9 written questions and comments were raised during the webinar (the Q&A is documented in Appendix A);
 - The deadline for written questions and feedback was extended to May 27, 2022; and
 - Written feedback was received from 4 Regional Districts. This is documented in Appendix B.
3. Outcome
- The feedback received was reviewed in detail by Recycle BC and considered against the proposed criteria;
 - A number of changes were made to the criteria in response to the feedback received, including;
 - The requirement to have a curbside garbage program in place for two years was adjusted to indicate that curbside garbage service only needed to be scheduled to launch no later than coinciding with the introduction of PPP curbside collection;
 - Clarification was provided on the parties able to provide curbside garbage collection under the criteria and the intent to exclude private subscription service;
 - Clarification was provided on the parties able to provide PPP curbside collection under the criteria; and
 - The maximum distance between an existing curbside service area included in the Recycle BC program was extended from 2 km to 5 km.

SECTION 3: Amendment

3.1 Regulation Subsection 5(1)(c)(iii)

Recycle BC's Program Plan adequately provides for reasonable and free consumer access to collection facilities. Recycle BC provides accessibility through curbside, multi-family, depot and First Nations Recycling Initiative collection of residential waste packaging and paper. 99.3% of households have access to Recycle BC's program in the province.

This amendment adds to Recycle BC's clear criteria for new curbside collection programs by defining curbside adjacency criteria for communities to add new curbside collection of packaging and paper within the Recycle BC program.

In developing the amendment language for Section 4.3.5 New Curbside Programs in its Program Plan, Recycle BC has demonstrated through this report the work undertaken on methodology, process, stakeholder engagement, and adjacency definition parameters to meet the Director's Letter requirement.

3.2 Amendment Language

Recycle BC proposes for approval the following amendment language for Section 4.3.5 New Curbside Programs in its Stewardship Plan:

PPP curbside collection service providers included in the Recycle BC program are eligible to service adjacent non-municipal areas provided each of the following criterion are met:

- *The proposed adjacent area has a maximum population of 4,999 residents;*
- *The proposed adjacent area has a minimum household density of 0.42 households/hectare;*
- *There is a maximum distance of 5 km between the existing curbside service area included in the Recycle BC program and the proposed adjacent area; and*
- *A curbside garbage collection program is in place in the proposed adjacent area or scheduled to launch no later than coinciding with the introduction of PPP curbside collection.*

For clarity, the following definitions are provided:

- *PPP curbside collection service providers may include any of the following:*
 - *Recycle BC, as the provider of curbside collection service in a direct service area adjacent to the proposed adjacent area; and*
 - *A local government providing curbside collection service in a service area adjacent to the proposed adjacent area, utilizing either in-house collection staff, a private contractor, or a sub-contract with another applicable level of government.*
- *Minimum household density: Defined as total occupied dwellings divided by total hectares in proposed service area, excluding non-populated areas (parks, crown lands, etc.) and areas not proposed to be serviced;*
- *Maximum distance: calculated by the distance of navigable roads between the edge of the existing service area and the proposed adjacent area;*
- *Curbside garbage: Program must be managed as a coordinated service directly by an applicable First Nation, municipality or Regional District and excludes subscription service whereby households' contract with one or more collection contractors directly.*

SECTION 4: Next Steps

4.1 MOECCS Approval

The curbside adjacency criteria was approved by Recycle BC's Board of Directors at its June 2022 meeting. Recycle BC prepared its report to the MOECCS as per the Director's Letter and, with this report, submits the amendment language for approval.

Once the MOECCS has approved the proposed amendment as outlined (3.2 Amendment Language above), Recycle BC will post this amendment as a companion document to its Program Plan on the Recycle BC website.

4.2 Offer to Join Recycle BC Program

Upon approval by the MOECCS of the proposed amendment, Recycle BC will provide offers to applicable local governments within 60 days. A minimum period of 6 months will be required between a local government accepting the offer and onboarding into the program.

Appendix A – Consultation Webinar Q&A

Recycle BC held its Curbside Adjacency Criteria Consultation on May 12, 2022. The following table contains the verbal and written questions and comments posed during the session, as well as Recycle BC’s response. Note that the responses provided reflect the changes to the criteria that were made after the webinar in response to the consultation feedback received, where applicable.

	Verbal Questions/Comments	Recycle BC Response
1	If there are dense areas around a municipality, would you consider onboarding them together? Or would they need to be onboarded separately?	This is up to the local government. If all areas meet the criteria, they can be onboarded together or in a phased approach. We would work with the Collector to determine a mutually agreeable timeline. We would not require each area to onboard at different times.
2	Does it need to be the municipality that has the curbside contract that provides the garbage service? Could it be the regional district that provides the garbage service to the residents outside the municipality?	We have amended the criteria to specify that the garbage service can be provided by any local government, whether that be a municipality, First Nation or regional district. The intent is to exclude private subscription garbage service.
3	2-year garbage requirement provides challenges – it is hard to roll out new collection programs without doing them at the same time. Training people to throw away their garbage for two years and then implementing recycling seems counter intuitive.	The two-year requirement was eliminated in response to this feedback.
4	Echo the difficulty of the 2-year curbside garbage requirement. We tried to pitch a garbage plan to residents and explained if we went ahead with the program Recycle BC would eventually come onboard and cover the recycling costs. Resident were suspicious of government plans. Would have been fantastic to have the commitment from Recycle BC upfront to cover the recycling costs. The 2-year garbage requirement kills expansion in areas that have no collections services as we want to roll out garbage, organics, and recycling together and tell residents that Recycle BC will cover the costs of recycling. We are committed to providing garbage service we just don’t have it in place for 2 years.	The two-year requirement was eliminated in response to this feedback.
5	We have an island that is part of our city, but we use boats to bring the recycling to the city. The city pays GFL to move the materials and they go to Recycle BC’s facility. We are looking for a way that we don’t need to pay for this.	Please connect directly with Recycle BC on this. If the area is within the City, then is not

		impacted by the adjacency criteria.
6	Is the criteria 2km from the existing service areas edge to the proposed service area edge? Is there any requirement from the furthest edge of the proposed service areas?	The 2 kms between the existing area and proposed areas is meant to be the closest navigable path between both areas. This distance was adjusted to 5 km.
7	Echo the difficulty of the 2-year curbside garbage requirement. The 2-year requirement causes confusion because the residents don't believe that Recycle BC will end up paying for the recycling service. Are there examples of why Recycle BC is concerned that the local government would not provide garbage service?	The two-year requirement was eliminated in response to this feedback.
8	Echo the difficulty of the 2-year curbside garbage requirement. Makes more sense to launch all 3 services (garbage, organics, recycling) at once. Does the existing municipality's service provider have to go outside the municipality to collect the for the adjacent community or can it be a different service provider?	If there are cases people are aware of where it makes sense for the contractor to be different for the existing and proposed area, we would like to hear about it. Then we can consider those scenarios. The intent was for the material in the proposed area to be picked up by the same contractor and delivered with the material from the existing area using the same reporting structure and agreement. Clarification was provided in the updated criteria to indicate the parties able to provide PPP curbside collection under the criteria.
9	Under our existing agreement local governments can choose their own contractor?	The intent is not to dictate the private contractor that is used. A different private contractor can be used for the existing service area and the proposed service area. Where it gets more complicated is if a municipality were to subcontract a regional district to service the adjacent community. We would like to hear from you if this is a likely scenario so that we can review those cases. We are looking to avoid creating small new service areas that have their own agreement. We would

		<p>like these adjacent areas to be incorporated into an existing service area/agreement.</p> <p>Clarification was provided in the updated criteria to indicate the parties able to provide PPP curbside collection under the criteria.</p>
10	If a First Nation has a curbside contract with Recycle BC, can they expand their contract into non-First Nations areas?	Yes, First Nations are not limited to only servicing First Nations households but it depends on the geographic context. Please contact Recycle BC directly on the specifics.
11	Where do municipalities with a population less than 5,000 fit into this?	They would receive depot service under our program as the adjacency criteria is meant to cover dense areas near an existing municipality with curbside service. There are municipalities under 5,000 people that are only eligible for depot service and there are rural unincorporated areas under 5,000 people that are also not eligible for curbside service and only have depot service.
12	If the 2-year garbage requirement out of your control, perhaps a compromise is if the local government is providing garbage service somewhere else successfully for 2 years that could be sufficient. As long as we commit to providing garbage at the same time as recycling.	The two-year requirement was eliminated in response to this feedback.
13	If there is a First Nation adjacent to a municipality but the municipality is not able to expand service to the First Nation can the Regional District expand service to the First Nation even, they don't have a curbside contract with Recycle BC?	We have shown flexibility in onboarding First Nation communities. If there is a nearby First Nation community interested, please get in touch with us directly so that we can look into collection options.
14	If an area meets equivalency and then an area next to that meets adjacency is that ok?	Yes, as long as both areas independently meet the applicable criteria.

	Written Questions/Comment	Webinar Response
1	Wondering what the rationale is for requiring municipalities/RD's to conduct 2 years of garbage service	Our rationale is that we want the local government to demonstrate

	<p>before being allowed to include recycling if wanting to expand curbside service. It seems backwards and limiting to not roll out a new curbside service that includes multistream collection (garbage, recycling and ideally organics). Decreasing/limiting access by only providing garbage will result in divertables ending up in the waste stream. From where Solid Waste Management Plans are now and the targets set in these and from the Province, only allowing garbage for 2 years for establishing new curbside service really seems to go against all this work and doesn't appear to be a progressive approach to waste management that places priority and focus on diversion.</p>	<p>commitment to providing a comparable level service for garbage. We want to see that the area makes sense for garbage service, the service is successful and that residents support it. To support recycling the local government's commitment to providing the same level of service for garbage is important for contamination remediation and integrated resident messaging.</p> <p>The two-year requirement was eliminated in response to this feedback.</p>
2	<p>Regarding the curbside provider requirement. If there are competing providers, and one provides recycling service in an area, but the adjacent provider doesn't, but would like to, would that be ok?</p>	<p>These are areas in your region we are aware of that meet the equivalency criteria. It's suggested that areas that meet the equivalency criteria not use the adjacency criteria.</p>
3	<p>Is there any additional support or programs for onboarding a First Nation community? And, can Recycle BC tell us what the population density is for a specific area for the consideration of expanding curbside service or can you give us more details on how we can calculate that to see if an area meets that criteria point?</p>	<p>We do have additional support and projects for increasing service for First Nation communities including a First Nations Field Services Specialist whose role is to work with First Nations on increasing their capacity. If there are First Nations interested in joining the program, please connect with us directly.</p>
4	<p>Will there be exceptions for areas that meet all but one of the criteria? For example: slightly less than the density requirement, or the community is private subscription service. Is there potential for these types of areas to be included in Recycle BC in the future?</p>	<p>The intent is that all the criteria is met. There are areas that meet the criteria except the garbage requirement so there is potential for additional communities to meet the criteria and be onboarded in the future.</p>
5	<p>If an area looking to expand to recycling services is incorporated, is that ok or are they required to be unincorporated? I know our First Nation community has signed their new treaty and are their own sovereign government, not sure what their status is in terms of incorporation but wondering if that's a criteria factor that the area has to be unincorporated.</p>	<p>Our understanding is that Treaty First Nations areas are considered "unincorporated." The purpose of the term unincorporated in the criteria is to exclude incorporated municipalities specifically, which have their own criteria for</p>

		curbside collection in the Program Plan.
6	We are looking to consult on rural curbside to increase diversion. Being able to offer 3 stream at launch would be significantly improved over 2 stream with a potential for recycling down the road.	The two-year requirement was eliminated in response to this feedback.
7	The criterion that a curbside garbage collection program is in place for a minimum of two years is overly restrictive, especially since this an EPR program already contributed to by consumers in these areas. It is concerning that a level of service for garbage collection determines access to recycling, this is not consistent with the Pollution Prevention Hierarchy that prioritizes recycling before disposal. Having a service provider in the area that is willing and able to serve the area should be adequate.	The two-year requirement was eliminated in response to this feedback.
8	Does RecycleBC have any examples of rural curbside collection services provided by a local government that were not 'successful' and failed to demonstrate they could provide garbage collection, or cancelled the collection service after a period of time - essentially justification for the 2 year rule?	The two-year requirement was eliminated in response to this feedback.
9	I do not understand the reason provided for requiring 2 yrs of garbage service. You need public approval to offer a new service and setting up contracts for collection or getting equip/staff is no small feat. Trust that local governments would not offer curbside service willy-nilly.	The two-year requirement was eliminated in response to this feedback.

Appendix B – Written Feedback

Formally submitted written feedback was received from four Regional Districts. Regional District names and geographic areas will be anonymized before this amendment is publicly posted on the Recycle BC website.

Recycle BC responded to each of these Regional District's to thank them for their feedback, to provide the updated criteria approved by our board for submission to MOECSS, and to highlight the changes made to the criteria in response to the feedback received. As noted above, these changes included:

- The requirement to have a curbside garbage program in place for two years was adjusted to indicate that curbside garbage service only needed to be scheduled to launch no later than coinciding with the introduction of PPP curbside collection;
- Clarification was provided on the parties able to provide curbside garbage collection under the criteria and the intent to exclude private subscription service;
- Clarification was provided on the parties able to provide PPP curbside collection under the criteria; and
- The maximum distance between an existing curbside service area included in the Recycle BC program was extended from 2 km to 5 km.

Columbia Shuswap RD:

A General Overview:

The CSRD would like to share some general thoughts and comments, based on actual experiences from trying to implement recycling collection in an unincorporated Electoral Area (Electoral Area C (Sorrento/Blind Bay/White Lake/Tappan/Sunnybrae) with a population of approximately 8,900 according to 2021 census data.

As with most unincorporated areas across British Columbia, there is typically no existing curbside collection program for garbage, it is often a private hauler recognizing a need to provide a private hauling service. As such, in 2018/19 the CSRD embarked on a process to examine the costs to deliver a curbside collection service for Area C, which would include garbage, food waste and recycling collection services. Working with a consultant from the collection business, cost estimates were formulated and a survey to the public was performed, outlining options for collection and associated costs.

Unfortunately, because of the RecycleBC criteria for "curbside garbage collection program is in place for a minimum of two years" CSRD staff were forced to try and convince residents that if they chose to proceed with a curbside program, RecycleBC would in time fund the recycling portion. Not sure if RecycleBC has had the experience of implementing waste collection programs, but it's an uphill battle right from the start, especially in rural areas where there's a healthy distrust of government and a government run programs that are going to result in an increase in taxes. Carmen Fennell was a part of the CSRD team that led the consultation on this program initiative, I'm sure she could provide some insights as well!

What the CSRD is trying to say is that in order for the CSRD, and likely several Regional Districts across BC, to implement a curbside recycling collection program, we need up front support from Recycle BC. The CSRD is fully willing to take on an initiative of increasing/expanding Recycle BC's collection areas within the CSRD, but without the up-front commitment, the costs are prohibitive.

As such, the CSRD is recommending that RecycleBC consider partnering with Regional Districts that are willing to implement a curbside collection service in unincorporated areas immediately, rather than 2 years after implementing a curbside garbage collection service.

In terms of the more general questions related to expanding into adjacent unincorporated areas, it is important to note that typically member municipalities are operating the collection service via the Recycle BC remuneration program or have handed over the services to RecycleBC to directly administer. Either way, the Regional District has a very limited role in the delivery of curbside collection programs led by municipalities. Essentially, you're asking a Municipality to expand into a Regional District area.....the political and bureaucratic challenges to this are a massive impediment to implanting any sort of expanded services for Recycle BC. I don't believe this is well enough understood by the Recycle BC proposal for expanding services.

As such, the CSRD is fully committed to meeting with Recycle BC staff to better explain our challenges and to better understand Recycle BC's goals and objectives in expanding services.

Additional comments on the RecycleBC proposal and additional points to reiterate our challenges in implanting/onboarding new areas of our Regional District:

- There is a maximum distance of 2 km between an existing curbside service area included in the Recycle BC program and the proposed adjacent area;

In the presentation the rationale behind deciding on the 2km between existing curbside was not provided. There would be very few areas that would qualify in the CSRD, but if the distance would be increased to 5km, then more rural areas not only in the CSRD, but other regional districts would consider transitioning to curbside collection of recycling material.

- A curbside garbage collection program is in place for a minimum of two years in the proposed adjacent area;

This criterion adds to the greater challenge for local governments to introduce curbside collection programs. The amount of staff time dedicated to developing a program and infrastructure required to operate a collection program for two years without the guarantee of Recycle BC even signing on after the two years seems short sighted. It is unrealistic for residents to agree to a program with only a possibility of paying for collection in two years before being onboarded. If local governments are not able to offer all three streams (garbage, food waste and recycling) all at once then the program will not be successful, and residents will be skeptical. The collection costs for the Recycle BC material being covered at the introduction of the program would allow for local governments to convince the residents of the program and provide service at a lower cost from the start.

- Curbside garbage: Program must be managed by the local government proposing service

The CSRD does not manage any curbside garbage collection program, only the member municipalities. The member municipality would most likely not propose the expansion of curbside recycling and the CSRD along with the member municipality would propose the expansion together. Also, member municipalities would not necessarily have the capacity to provide the service of collection so alternatives (private haulers) may have to be contracted to collect the material.

Let's Talk Trash (qathet RD):

The following are feedback comments from Let's Talk Trash:

- Requirement of 2 years of garbage collection -> We recommend that this criteria be removed. If rolling out a new curbside collection program, mandating that garbage be a part of the system is imperative but being limited to only garbage collection for a minimum of 2 years is not inline with current waste management practices. Ideally, any area starting to receive a new curbside program should have access to, at a minimum, garbage and recycling. Establishing a new program is best done at once, not piecemeal. Being able to offer only garbage for the first 2 years will inevitably train residents to throw everything into the garbage, which will be challenging to address post year 2 in trying to then change behaviours to encourage diversion. If there are concerns about the service provider and providing a consistent service, I think RBC can employ alternative initiatives, contract conditions, etc to address these concerns to allow curbside collection programs to stay relevant and in the 21st century by allowing the acceptance of recycling collection right from the start.
- We recommend the addition to allow a different service provider to service a new area being included under the adjacency criteria. For our local area, we can foresee a community that meets the adjacency criteria but may not be able to be serviced by the City who currently does the City's garbage and recycling curbside collection due to capacity challenges. It would be advantageous to include a new area and avoid the potential barrier of being solely reliant on the current service provider. The current provider could be required to have the first opportunity to take on the new service route but if due to the current service provider not having the capacity to service the area, or lack of interest, etc., it would be helpful to be able to engage with another provider. The particular neighbourhood in our area that meets the adjacency criteria currently has access to curbside garbage pickup, which is a free service to residents living with this First Nation community, provided by the Nation through their own private garbage truck. Having some leeway in allowing either the First Nation or another private hauler to be able to provide curbside recycling would put this neighbourhood in a more advantageous position to get service, which we assume would increase the diversion and recycling rate, if the City, who holds the contract with RBC, is not able to provide the service.

RD of Central Kootenay:

Thank you for the opportunity for local governments and other stakeholders to provide feedback to Recycle BC as they continue to develop and amend their Packaging and Paper Product Extended

Producer Responsibility Plan. This plan governs how almost all British Columbians receive recycling service for their most common recyclable materials and how local governments provide that service so it is important that perspectives from across the entire province are considered.

As the RDCK is developing its organic waste management program and composting facilities expanded curbside collection services are being evaluated. This represents a terrific opportunity to maximize the services to our residents and include curbside recycling collection in those evaluations as we feel there are several areas in the district that could meet either the proposed Curbside Adjacency Criteria or the existing Curbside Equivalency Criteria, except for the requirement of two-years of local government provided curbside garbage collection. This requirement places an unfair burden on local government to fund a service without support from the Product Stewards that should be managing PPP, and no guarantee that curbside recycling will even be offered after the two-year period is complete. Further, it could create skepticism in residents that receive the service and incentive through convenience for curbside users to dispose of PPP in the waste stream rather than drive it themselves to an RBC depot. We suggest the two-year curbside collection requirement be amended to allow local governments to qualify for RBC curbside collection should they commit to launching both curbside garbage and recycling collection simultaneously. Local governments that already provide curbside garbage collection for any length of time should also satisfy this requirement.

Second, the requirement that potential adjacent service areas be within two kilometers of existing curbside recycling service areas should be modified to make allowances for unique geography. A maximum distance of two kilometers measured by navigable roads may eliminate some closely linked communities in areas like the Kootenays or the Coast where steep terrain and coastlines necessitate less direct transportation routes. This distance should be extended where a proposed Service Area would not qualify for its own curbside program under the Equivalency Criteria but would under the Adjacency Criteria if not for its distance from an existing curbside recycling program.

We look forward to hearing about the results of this consultation and the continued improvement of the RBC Extended Producer Plan.

Cariboo RD:

[Cariboo RD comments are provided in red beside the original criteria used for the consultation webinar]

Unincorporated areas adjacent to existing PPP curbside collection service areas included in the Recycle BC program are eligible to be serviced under the Recycle BC program provided each of the following criterion are met:

- The proposed adjacent area has a maximum population of 4,999 residents;
- The proposed adjacent area has a minimum household density of 0.42 households/hectare;
- There is a maximum distance of 2 km between an existing curbside service area included in the Recycle BC program and the proposed adjacent area;

- A curbside garbage collection program is in place for a minimum of two years in the proposed adjacent area; - What is the reason for this requirement? Launching curbside garbage and recycling at the same time allows LG to provide the collection containers, information, education, and promotion at one time, rather than coming back in two years to introduce a second service. Most importantly though, delaying recycling collection will train residents to dispose of PPP in the garbage for two years as many residents are not going to haul their recyclables to a depot when they no longer have to drive to a refuse site to drop off garbage. Additionally, it would put pressure on the LG to provide PPP collection independently for the two-year window, which is unrealistic.
- A PPP curbside collection service provider included in the Recycle BC program is able and willing to expand their existing curbside service area to include the proposed adjacent area, which may include one of the following:
 - Recycle BC, as the provider of curbside collection service in a direct service area adjacent to the proposed adjacent area; - For Direct Service areas, what would the process be to determine if RBC will provide the service to the adjacent area? What kind of timeline would be expected? If RBC requires the adjacent municipality to provide the garbage collection, please provide a reason why. If 2 years of garbage collection remains as a requirement, would RBC commit to the service before the garbage collection was launched?
 - A local government providing curbside collection service in a service area adjacent to the proposed adjacent area. If the adjacent collection area(s) justify an additional day of service, could this be provided by the RD, or would the curbside collection service provider (municipality) with the existing collection contract still have to manage this area?

For clarity, the following definitions are provided:

- Minimum household density: Defined as total occupied dwellings divided by total hectares in proposed service area, excluding non-populated areas (parks, crown lands, etc.) and areas not proposed to be serviced;
- Maximum distance: calculated by the distance of navigable roads between the edge of the existing service area and the proposed adjacent area;
- Curbside garbage: Program must be managed by the local government proposing service – could this be re-worded to say “Curbside garbage” excludes private garbage collection, and must be provided by a LG?