

Solid Waste & Recycling

Blog

LETTER: Response to BC's 'A' grade from EPR Canada

If we're going to discuss "A's" let's start with ACCOUNTABILITY?



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BC has many EPR programs — more than any other province — and the desire of BC residents and industry partners to participate in recycling programs should be applauded. British Columbians have, for decades, embraced the culture of recycling. Many of BC's longest standing industries and independent businesses are recycling based. Most EPR programs have been created to address valid waste management issues. EPR can be a great tool for waste management.

However, one must keep perspective in the awarding of the EPR Canada's Certificate of Recognition for the "A" British Columbia received. This award is said to be the result of an audit, but we should look at who performed the audit and who is passing out the grade. If the award was to reflect a comprehensive view of EPR programs, and had included input from all stakeholders such as collectors, haulers, processors, regional districts, municipalities and consumers at large, BC may well have received a different score.

EPR Canada is a group of consultants, most of whom have done work for EPR stewards in a number of jurisdictions including BC. So essentially EPR Canada is patting themselves on the back, as they can be included in the group of people who help create some of BC's EPR programs.

Looking at EPR Canada's website it becomes apparent that some of the founders / consultants have supported blue box EPR programs that leave the consumer and taxpayers on the hook for discarded materials and relieve manufacturers of any or most costs.

It's true that the British Columbia Litter Act, and the offspring that emerged from the introduction of that Act (Used Beverage Container Stewardship Plan), which uses deposit-return as a collection method, has become a program to be admired and appreciated by the masses. The Used Beverage Container Stewardship Plan holds fast at the top of the EPR pile for a program that works.

So then, how does BC get an A when all the other EPR programs in BC have chosen not to use the best proven recovery method in applications that would have been a natural fit? Mayonnaise and pickle jars, plastic dish soap, shampoo and other toiletries containers and soup/vegetable cans are all sold in containers made out of the same materials from which beverage containers are made. All those containers could have been put into the deposit program. Manufacturers plead that families would starve if these containers had deposits attached. On the contrary! Deposits are returned to those who bring the containers back. In fact, abandoned deposit-bearing containers support hundreds of community groups and charities and help thousands subsidize income.

Programs not operating under deposit systems charge visible or non-visible non-returnable recycling fees. These non-refundable recycling fees account for hundreds of millions of dollars taken out of consumers pockets each year.

BC should have immediately been downgraded for failing to recognise milk as a beverage under the Recycling Act. Milk is sold and marketed as a beverage in BC. How is it that milk can be marketed and sold as a drinkable food product for sale when it's not recognised under our own regulations as a beverage? Milk containers should have been assigned into the Used Beverage Container EPR program, as Alberta has done.

Years ago, BC lowered its deposit rates to support the Alberta used beverage container program under a harmonization agreement. Since that agreement was born, Alberta deposit rates have gone up and milk containers have been included in the Alberta used beverage container program. BC has not matched the program. Maybe it's because one or more consultants on the EPR Canada Board helped get milk containers assigned into the BC Printed Paper and Packaging (PPP) program?

The majority of EPR programs operating in BC piggy back on the network of bottle and recycling depots established by independent owner operators and / or taxpayer funded municipal collection sites or non profits (subsidised by the taxpayers). EPR stewards frequently pitch to collectors, transporters and processors why they should be willing to assume all the risk and should be doing more for less or nothing at all. Some EPR stewards have not increased handling fees to contractors for over a decade at a time when business costs in BC have risen over 25% in the past five years. Some EPR programs hope to enslave collectors by offering no remuneration at all.

Non-negotiated, one sided, short-term, easily cancelled contracts offering pittances for the work performed, delivered in a take-it or leave-it style, offer no security for the risk takers, but are what most stakeholders expect to be offered under the most of BC's current EPR programs. Some collectors and other industry partners say they feel looked down upon as if they were the residual of EPR programs instead of being embraced as valued partners. This is the shameful history of BC's EPR programs that no one wants to talk about.

Staff at the Ministry of Environment tries hard to see all sides of the recycling industry and are aware of the ongoing issues affecting the stakeholders. But EPR programs that are industry led will continue to focus on the best interest of industry. Regulations that put industry solely in charge of program development and that lets EPR stewards report their successes, using third parties they have hired, using information they have provided to those third parties, using whatever methods they see fit to get the desired recovery results, all without an independent governing agency consisting of all stakeholders to over see the programs leaves most stakeholders frustrated and concerned about the viability of the industry they helped create.

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BC and the outside world need to see this award for what it is worth. BC would be better served to take a stronger leadership role and make substantial improvements to the EPR templates and current regulations to "protect the interests of all stakeholders" and introduce an "Independent Recycling Management Board" "consisting of all stakeholders" so that we make sure EPR programs work in everyone's interests.