

Recycling Council of British Columbia

Current Public Policy Positions

(Updated June 2020)



Umbrella Policy: Guiding Principles

Precautionary Principle – Approved Apr. 30th, 2020 (updated from Precautionary Principle – Mar. 29th, 1994)

RCBC supports the Precautionary Principle. This principle

- ensures that any substance suspected to pose a significant threat or adverse impact to the environment or public health is subject to a thorough evaluation prior to approved production, use or disposal;
- establishes that the onus for evaluation of the substance, and the demonstration of substance safety, shall be the responsibility of the producer or service provider through procedures specified by the legal regulator;
- establishes that where reasonable doubt about the safety of any product or activity exists, the regulatory agency will assume the substance or activity is potentially harmful until proven otherwise and will prohibit its production, use, application or disposal; and
- asserts that the responsible legal regulator will establish the legal basis for approved evaluation, production, use or application, and disposal.

Design for the Environment – Approved Mar. 26th, 2020

RCBC supports the principle of design for environment, where the whole life cycle of products and materials are taken into account:

- Products and packaging are designed to last longer and be more durable, reusable, repairable, easily disassembled, and fully recyclable at end-of-life;
- products and packaging use more sustainable materials (reused and recycled materials or sustainably-harvested renewable resources); and
- existing materials are used before virgin natural resources are harvested, and materials are preserved and valued for continued use.

Continuous Improvement – Approved Mar. 26th, 2020

RCBC supports the principle of continuous improvement where products, services, and processes – including objectives and targets – are improved on an ongoing basis through incremental and breakthrough improvements.

Zero Waste – Approved Mar. 26th, 2020 (updated from Zero Waste – Jul. 21st, 2000)

Zero Waste is a goal that has been supported by RCBC since 2000. Zero waste means the conservation of all resources by means of responsible production, consumption, reuse, and recovery of products, packaging, and materials without burning and with no discharges to land, water, or air that threaten the environment or human health.

Level Playing Field – Approved Mar. 26th, 2020 (updated from Level Playing Field – Nov. 29th, 1994)

RCBC supports the principle of a Level-Playing Field:

- policies and regulations should apply to all industries operating within a jurisdiction and to all products, both domestic and imported, including those purchased through cross-border and on-line shopping; and
- within the public process everyone should have equal access to information and adequate opportunity to participate.

Polluter Pays Principle – Approved Mar. 26th, 2020 (updated from Polluter Pays Principle – Mar. 29th, 1994)

- RCBC supports the Polluter Pays Principle: whoever causes environmental degradation or resource depletion should bear the 'full-cost'.
- This policy is intended to encourage industries to internalize environmental costs and reflect them in the prices of the products. This can be reinforced by adopting new EPR programs for additional products.

Extended Producer Responsibility Framework Principles

– Approved Jan. 2010 (marked for updating)

- 1.) Waste Reduction Hierarchy** - Programs must illustrate a commitment to following the 3R waste reduction hierarchy and to achieving the highest, best use for collected materials through demonstrated continuous environmental improvement
- 2.) Level Playing Field** - Policies and regulations must apply to all producers within a designated category, both domestic and imported, with no de minimis provisions, including products purchased online
- 3.) Results Based Evaluation** - Program success should be evaluated by government and the public based on results-based performance standards determined by measurable objectives and not through prescriptive requirements, allowing producers flexibility to design programs
- 4.) Product Categories** - The Recycling Regulation should apply to easily defined product categories and producers should be responsible for the environmentally sound management of their products and all associated packaging
- 5.) Phased Approach** – Government should bring new product categories under regulation allowing for implementation by groups of brand owners with similar products that provide adequate time for producers, local governments and the public to prepare for the transition to EPR

- 6.) **Producer Pays** - Producers must be responsible for all program costs associated with EPR services for products covered by the legislation, with no financial share borne by the taxpayer
- 7.) **Open Competition** – Stewards should be encouraging to provide a level playing field to existing companies on a competitive basis
- 8.) **Transparency** – Information in the public interest related to program financing and the management of recovered products and/or materials should be transparent and accessible
- 9.) **Visible Fees** - Visible fees should be neither required nor prohibited. The decision to internalize program costs in the price of a product should be solely that of producers and/or retailers
- 10.) **Design for Environment** - Producers must demonstrate an adequate effort in DFE to eliminate or reduce the environmental impacts of products and their packaging throughout their lifecycle
- 11.) **Public Access** – Stewardship programs must provide reasonable access to collection services
- 12.) **Public Awareness** – Producers should be able to demonstrate and report polling data demonstrating adequate levels of awareness of the program among affected sectors
- 13.) **Financial Sustainability**– Programs should be adequately funded and financially stable to ensure the delivery of requisite levels of service, public access and collection.

Umbrella Policy: EPR

Deposit Refund Systems – Approved Mar. 26th, 2020 (updated from Deposit Refund Systems – Nov. 23rd, 1992)

That deposit amounts and accepted products are reviewed at an established regular interval, and at a minimum as part of a program plan renewal. RCBC supports the application of deposits on all ready to drink beverage containers including milk and milk substitutes to be consistent with neighbouring jurisdictions.

Product Stewardship – Approved Nov. 29th, 1994 (marked for updating)

“RCBC supports the principle of Product Stewardship that: industries assume responsibility for the full-cost of their products and packaging from ‘cradle to grave’ and consumers support these initiatives.”

Umbrella Policy: EPR Programs

EPR Program Gaps and Expansion – Approved Mar. 26th, 2020 (updated from Solvents and Pesticides – Sep. 20th, 1996; Commercial and Industrial Paints – Dec. 3rd, 2004; Pesticides and Herbicides – Dec. 3rd, 2004; New EPR Products – Oct. 26th, 2007)

As a result of consultation with stakeholders in 2019 on EPR priorities, RCBC supports a phased expansion of the products and product categories included within the Recycling Regulation to capture the following identified gaps:

- all ready-to-use pesticide and solvent products and all pesticide and solvent containers;

- all household hazardous waste sold by retailers to residential consumers including pool chemicals, expanding foam products, pressurized tanks (e.g., helium tanks and fire extinguishers), and cylinders for fuels and gases (e.g., propane tanks and butane canisters);
- medical sharps;
- mercury-containing items;
- non-lead–acid batteries larger than 5 kg;
- all commercial and industrial paints;
- residential-scale demolition and home restoration materials;
- construction and demolition materials from the institutional, commercial, and industrial sectors;
- carpeting and flooring material (underlay, vinyl tile, hardwood, and laminate);
- mattresses;
- sofas and other furniture items;
- baby seats and child car seats;
- durable plastics (e.g., PVC piping, vinyl siding, and toothbrushes);
- textiles;
- packaging and printed paper from institutional, commercial, and industrial sectors;
- hardcover and softcover books;
- and new and trending products like e-vapes.

Container Recycling Fees – Approved Jan. 28th, 2005 (marked for updating)

“RCBC position on CRFs from the year 2000 on CRF be rescinded and a new position developed.”

Background:

In a March 13, 2000 Position Paper on Encorp Pacific’s New Recycling Fees, RCBC came out against the use of visible fees and cited lack of accountability, lack of consultation and lack of consumer education as reasons to oppose the implementation of these. In addition, the Position Paper recommended that Encorp should suspend the Recycling Fees (at least temporarily), provide effective consumer education, and discontinue the practice of displaying the fees on the receipts.

Umbrella Policy: Organics

Organics Management Strategy Development Using P2 Hierarchy

Approved Mar. 26th, 2020 (updated from Organics – Oct. 15th, 2004)

RCBC supports the Province's approach to using the pollution prevention hierarchy to first prevent food waste at the residential and business level, and optimize organics processing infrastructure to capture remaining organic materials. These initiatives can move the Province towards meeting the United Nations Sustainable Development Goal 12.3 to "halve per capita food waste at the retail and consumer levels and reduce food losses along production and supply chains, including post-harvest losses" by 2030 (from the 2015 baseline).

Umbrella Policy: Rethink/Reduce

Climate Action Plan for a Circular Economy – Approved Apr. 30th, 2020 (updated from Climate Action Plan – Sep. 19th, 2008)

RCBC supports a circular economy approach to materials management that integrates strategies to lower carbon pollution. This support extends to the 2018 Clean BC Plan, which lists actions to prevent waste and to stop waste at the source by:

- wasting less and making better use of waste across all sectors of the economy, like forestry, agriculture, and residential areas;
- reducing the generation of organic materials and turning the remaining materials into products and clean renewable energy;
- and striving for continuous improvement.

Single Use Bags – Approved Dec. 5th, 2008 (marked for updating)

It is the Recycling Council of B.C.'s position that the issue of single-use shopping bags should be addressed through the B.C. Recycling Regulation, which would hold producers responsible for managing these products throughout their entire life cycle.

The objective of this program should be to shift away from single-use shopping bags and encourage reusable options whenever possible, with the remaining quantity of single use bags collected and recycled through an Extended Producer Responsibility program.

- An excessive quantity of single-use shopping bags is generated in the province of B.C.
- The extraction and production of the material to manufacture single-use bags acts as another major source of greenhouse gas emissions
- Responsibility has largely fallen upon municipalities and taxpayers to collect and dispose of single-use shopping bags
- Many local governments in B.C. are considering applying bans, taxes and other regulatory tools available to them to reduce the quantity of single-use bags generated within their jurisdictions
- These policies have the potential to drive positive change and encourage senior levels of government and the private sector to tackle the issue of single-use bags
- Many private sector stakeholders have voluntarily agreed to reduce the quantity of single-use bags that are distributed within their stores
- The combination of local government and private sector initiatives, while positive, creates a multi-jurisdictional patchwork of programs that are confusing to both producers and consumers
- Any solution needs to focus on all single-use bags and material types (plastic, paper, biodegradable etc.) and not favor any one material type over the others."

Waste to Energy Facilities – Approved Sep. 19th, 2008 (marked for updating)

"RCBC adopts a position that 1) is opposed to the development of new waste-to-energy disposal facilities – including bioreactors and incinerators (mass-burn, pyrolysis, plasma, gasification and any other conversion technology) as they inhibit/prevent/restrict the development of Zero Waste programs and facilities aimed at the reduction, reuse, recycling and composting of discarded products and materials and 2) asserts mixed municipal solid waste should not be considered a "clean," "renewable" or "carbon-neutral" source of energy."