

**Recycling Council of B.C. – Archived Public Policy Positions**

**Umbrella Policy: Guiding Principles**

**Zero Waste Definition** – Approved Dec. 5th, 2008

RCBC adopts the ZWIA definition of zero waste as follows:

‘Zero Waste is a goal that is both pragmatic and visionary, to guide people to emulate sustainable natural cycles, where all discarded materials are resources for others to use. Zero Waste means designing and managing products and processes to reduce the volume and toxicity of waste and materials, conserve and recover all resources, and not burn or bury them. Implementing Zero Waste will eliminate all discharges to land, water or air that may be a threat to planetary, human, animal or plant health.’”

**Revised EPR Policy** – Approved Mar. 15th, 2002

“Extended Producer Responsibility (EPR) is an environmental strategy arising from the Polluter Pays Principle. The strategy objective is to minimize the environmental burden of a product by making the producer/consumer directly responsible for the financial costs and management functions associated with products throughout the product’s life cycle with particular focus on the post-consumer stage where responsibility has traditionally rested with local government authorities.”

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

“RCBC fully supports the concept of Zero Waste.”

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

“RCBC supports the Precautionary Principle which:

-ensures that substance or activity which poses a threat to the environment is prevented from adversely affecting the environment, even if there is no conclusive scientific proof linking that particular substance or activity to environmental damage.”

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

“RCBC supports the Polluter Pays Principle:

-whoever causes environmental degradation or resource depletion should bear the ‘full-cost’  
-intended to encourage industries to internalize environmental costs and reflect them in the prices of the products.”

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

“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 shopping.

-within the public process everyone should have equal access to information and adequate opportunity to participate.”

## Umbrella Policy: Zero Waste Hierarchy

### **Waste Hierarchy** - Approved Dec. 3rd, 2004

“RCBC adopt the Hierarchy recommendations from the Policy Committee:

- that the RCBC Board commend the Ministry of WLAP for including pollution prevention hierarchy in its new *Recycling Regulation*, together with strict instructions as to the way that the hierarchy is to be applied; and
- that the RCBC Board call on the Ministry to use science-based judgments to determine what level of the hierarchy should be attained; and take into account social, environmental, and health issues; and that the RCBC board call on the Ministry to use the Precautionary Principle to establish an acceptable level of the hierarchy in instances where science cannot provide a high degree of certainty.”

### **3 R's Hierarchy** - Approved Nov. 29th, 1994

“RCBC supports the 3R's Hierarchy: recognizes that pollution prevention, resource conservation, and waste management strategies should give priority to waste avoidance and reduction techniques, implemented in the specific order: source reduction, reuse, and recycling.”

### **3 R's Hierarchy** – Approved May 12th, 1993

“RCBC is committed to the 3R's hierarchy (reduce, reuse, recycle). The 3R's is a priority of strategies or techniques that should be employed to reduce waste. The hierarchy is based on a philosophy of environmental sustainability.

Each technique, process or product should stand up to scrutiny through the life-cycle analysis' (LCA's) available. Life-cycle analysis is defined as the identification and analysis of the environmental impacts associated with a product, package, or service through all stages, from initial resources extraction through to final disposal. If comprehensive, reliable LCA's are not available, the basis for political action should be maintaining the 3R's hierarchy.

RCBC's commitment to the 3R's hierarchy is consistent with the Canadian Council of Ministers of the Environment (CCME) which has adopted the policy that “there is a hierarchy with the three R's. Source Reduction will be considered first, with elimination, i.e. no packaging, being the most favoured option. Re-use is the second favoured option, with Recycling third. It is important that the three R's be considered in this sequence in order to determine the best combination of solutions to achieve maximum diversion in the most cost effective manner.

In the light of this nationally-accepted policy, RCBC favours continuing to apply the 3R's in this order. However, when decisions are made, it is also important that the process by which these decisions are made should include input from an advisory committee with a balance of representative interests (public, labour, industry, etc.) which attempts to find consensus.”

## Umbrella Policy: EPR

### **By Application Approach to EPR** – Approved Jan. 25th, 2008

“RCBC adopt a position to endorse a 'by application' approach towards the diversion of general WHEREAS 'application groups' who would carry out this EPR initiative are defined as those industry stewards who produce competing products.”

**Recycling Regulation: Repeat Dispute Resolution Clause** – Approved Nov. 29th, 2002

“RCBC supports that Section 15 (Disputes) be retained as is unless an option is put forward during the review of the Regulation, agreeable to the affected parties, that incorporates the concept of alternative dispute resolution including recourse to the Commercial Arbitration Act.”

**Recycling Regulation: Inclusion of a ‘Sunset’ Clause** - Approved Nov. 29th, 2002

“RCBC supports that the Regulation be amended to incorporate a non-sunset Review clause, as regular review is a means of keeping the Regulation both relevant and effective without exposing existing programs to an unnecessary level of risk.”

**Recycling Regulation: Revise Stewardship Plan Approval Process** – Approved Nov. 29th, 2002

“RCBC supports reviewing the current Approval Process with respect to the involvement of stakeholders, giving consideration to principles of inclusiveness, openness and accountability.”

**Brand-Owner Reporting Requirements** - Approved Nov. 29th, 2002

“RCBC supports that annual reports be required by all stewardship programs on an agreed date.”

**Repeal Return-to-Retail Requirement** - Approved Nov. 29th, 2002

“RCBC supports to retain return-to-retail as the basic collection system but revise the Section 3.10 requirements to provide for an unambiguous, open and transparent process for reviewing alternative collection models put forward by brand owners.”

**Extended Producer Responsibility** – Dec. 14th, 2001

“RCBC supports the principle of Extended Producer Responsibility: is an environmental protection strategy rising from the Polluter Pays Principle. The strategy objective is to minimize the environmental burden of a product by making the producer/consumer directly responsible for the financial costs and management functions associated with products throughout the product’s life cycle with the particular focus on the post-consumer stage where responsibility has traditionally rested with local government authorities.”

**Ground Rules of Product Stewardship** – Approved Sep. 29th, 1995

“RCBC supports the four ground rules of product stewardship:

1. That industries which introduce products and services into the marketplace be obligated to MINIMIZE THE LIFECYCLE ENVIRONMENTAL IMPACT of their products and services by designing their products and marketing systems according to the “3R hierarchy”.
2. That the full costs for operating product waste management systems be borne by the industries whose products and packaging is being managed, with no share borne by the taxpayer.
3. That any “product stewardship” regulation be mandatory and be applied to all products, all industries, and all firms within a particular sector.
4. That “product stewardship” programs must be developed, implemented, and monitored with a system in place to ensure that there is full public involvement, including access to information and participation in decision-making in any areas where industry actions may have an impact on the environment.”

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

“That deposit systems are: consistent with the promotion of conservation and recycling; an important component of a comprehensive waste reduction plan; compatible with other programs, such as curbside recycling.”

### Umbrella Policy: EPR Programs

**EPR Program for Packaging** – Approved Sep. 19th, 2008

“RCBC recommend that the province, without delay, pass legislation to require an EPR program for all packaging as defined in the Environment Management Act and phase in implementation based on environmental impact including energy savings, landfill space, and manageable product categories.”

**EPR for Packaging Announcement** – Approved Mar. 28th, 2008

“The Recycling Council of BC recommends to the Minister that the occasion of this symposium (Metro Vancouver International Symposium on Packaging – “Next Steps for Packaging Waste Management” on May 28/29, 2008) be the opportunity to announce British Columbia’s intent to add soaps, cleaners and detergents to the Recycling Regulation requiring producers (brand-owners ) to develop and submit a stewardship plan for collecting and recycling their packaging, with the understanding that the government will also consider, at the industry’s request, introducing a level-playing field regulation requiring the use of recycled content in this packaging application.”

**New EPR Products** – Approved Oct. 26th, 2007 (updated as EPR Program Gaps and Expansion – Mar. 26th, 2020)

“RCBC recommends the inclusion of mercury containing products along with soaps, cleaners, and detergents as new products under the Recycling Regulation.”

**EPR for Packaging** – Approved Jan. 26th, 2007

*“That RCBC support the recommendation by outlining the benefits in reduction of bulky packaging in local waste systems and the economic spin-offs (recycling market development in BC, local business opportunities and community economic development, and better packaging design).”*

Whereas:

- RCBC supports the Minister's stated goal that ultimately EPR will be applied to all product and packaging discards, ensuring relief for local governments from the burden of managing these discards;
- RCBC supports the Ministry's EPR principle of maintaining a "level playing field" so that no one business gains a market advantage over another by avoiding environmental responsibility;
- RCBC understands that any changes that affect a business's ability to compete in the marketplace can be detrimental not only to the business but also to the overall economy;
- There are several studies underway, by the Local Government Stewardship Council, the CCME, and the GVRD, to review discards and identify possible candidates for EPR;
- Packaging as a category is ubiquitous, huge and complex, with thousands of brand-owners and their packaging suppliers competing for market shares;
- In 2000 RCBC coordinated a multi-stakeholder study of rigid plastic containers that identified plastic bottles used for soaps, cleaners, and detergents to be low-hanging recyclable fruit with significant volumes going to landfill/incineration as well as recycling at public expense;
- There are relatively small number of major brand-owners of soaps, cleaners, and detergents;

- These brand-owners could be called to the table to develop a stewardship Plan, either individually or through a Stewardship Group;
- That an EPR program for this class of packaging would not foreclose on additional programs that might be recommended through the CCME, GVRD, and LGSC studies;
- RCBC is a multi-sectoral organization whose members demonstrate the ability to provide information and support in publicizing the addition of a new class of containers to BC's EPR regulation;
- RCBC's President and Executive Director recently met with Ministry staff and received indications that the Ministry wants to work with RCBC to continue supporting BC's leadership in EPR and the Zero Waste Challenge;

RCBC recommends to add all packaging from household and industrial detergents and cleaning products as a schedule to the Recycling Regulation represents a first step towards achieving the goal of adding all packaging as schedules to the Recycling Regulation, requiring brand-owners to submit a Stewardship Plan using any preferred options (ADF, recycled content, deposits, etc.) or combinations and variations to achieve a 75% recovery and recycling rate; That the recommendation be copied to the CCME for consideration at a national level”

**EPR and Packaging** – Approved Dec. 12th, 2006

“RCBC recommends that all products covered in the Recycling Regulation include associated packaging and that RCBC Communicate through the Hotline, news releases, media, and speak on the issue to the public at large to educate on it.”

**Commercial and Industrial Paints** – Approved Dec. 3rd, 2004 (updated as EPR Program Gaps and Expansion – Mar. 26th, 2020)

“RCBC recommends to the Ministry to expand the Recycling Regulation to include all commercial and industrial paints.”

**Pesticides and Herbicides** - Approved Dec. 3rd, 2004 (updated as EPR Program Gaps and Expansion – Mar. 26th, 2020)

“RCBC recommends the expansion of the Recycling Regulation to include all pesticides and herbicides.”

**Amendment to Beverage Container Stewardship Regulation Program** – Approved Aug. 13th, 2002

“RCBC recommends expanding the beverage container deposit refund program to include milk and milk substitutes and that BC consider the benefits of harmonizing with the neighbouring province's program once AB takes action.”

**Solvents and Pesticides** – Sep. 20th, 1996 (updated as EPR Program Gaps and Expansion – Mar. 26th, 2020)

“RCBC supports the inclusion of all ready-to-use pesticide and solvent products and all pesticide and solvent containers within the Solvents and Pesticides Regulation.”

**Umbrella Policy: Organics**

**Organics** – Approved Oct. 15th, 2004 (updated as Organics Management Strategy Development Using P2 Hierarchy – Mar. 26th, 2020)

“RCBC take a position promoting the diversion of organics be as an equally important priority as industry product stewardship.”

## Umbrella Policy: Rethink/Reduce

**A Call to Action** – Approved Sep. 19th, 2008

“RCBC endorses “A Call To Action – 12 Priority Policies Needed Now” from the report titled *Stop Trashing the Climate* (available at: <http://www.stoptrashingthecolimate.org/keyfindingdandpolicies.pdf>)”

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

“RCBC endorses the plan’s three preventative goals to reduce GHG emissions from waste:

- Keeping organic waste out of landfills: *the Plan supports the efforts of 9 of the province’s 27 regional districts to “keep organic material out, diverting it instead to home and community composting.”*
- Composting: *the Plan promises that “new strategies will be introduced to use organic waste to build soils in gardens and on farms.”*
- Stopping waste at the source: *the Plan makes reference to BC’s EPR programs “to make manufacturers more responsible for the packaging and other waste created by their products.”*

But to ensure that the Climate Action Plan has its intended effect, RCBC recommends the following modifications to the plan:

-Add the 12 Priority Policies from the “Stop Trashing the Climate Report” to the action items for waste in Appendix A of the plan and assign the appropriate funding to enable these actions. (The present plan has few meaningful and no funded actions as it stands).

- For the one proposed goal in the Plan that gives encouragement to waste practices that focus on energy production at the expense of material recycling and composting:

- *“Exploring opportunities for turning wastes into energy before they reach our landfills will continue to be a key priority, as will reducing the greenhouse gases generated by moving waste from one place to another.”* that this goal is removed as it is not compatible with the ultimate goal of reducing GHG.”