

Reference: 344750

May 9, 2019

Margo Wagner, Chair  
and Directors  
Cariboo Regional District  
Email: [mailbox@cariboord.ca](mailto:mailbox@cariboord.ca)

Cariboo Regional District  
File No. ....400-20.....

MAY 9 2019

Referred To ....CAO/MOES.....

Dear Chair Wagner and Directors:

Thank you for your letter of April 4, 2019, regarding suggested improvements to the BC Recycling Regulation.

The ministry has been focusing on continuous improvement of BC's 22 extended producer responsibility (EPR) programs for the past few years and we are now in a position to consider expanding the Recycling Regulation to include other products. The first step in this process is to better understand the current gaps in the recycling system related to the end-of-life of products in BC.

This research work is currently being undertaken by staff in my ministry and as this process continues we will begin to prioritize items for possible inclusion under the Regulation. Any future regulatory amendments will be based on broad consultation. The Caribou Regional District will have the opportunity to provide their comments on proposed amendments as part of the consultation process.

I have also shared your letter with staff in my ministry who are working in the extended producer responsibility program area to ensure your comments are considered as part of our consultation. More information on EPR is available on [our website](#).

Thank you again for taking the time to write and for sharing your concerns with me.

Sincerely,

George Heyman  
Minister

File: 400-20

**E-MAILED**  
Apr 5, 2019

April 4, 2019

VIA EMAIL: [ENV.Minister@gov.bc.ca](mailto:ENV.Minister@gov.bc.ca)

The Honourable George Heyman  
Minister of Environment and Climate Change Strategy  
PO Box 9063  
Victoria BC V8W 9E2

Dear Minister Heyman:

Re: Improvements needed to the BC Recycling Regulation

The Cariboo Regional District (the Region) requests that the Ministry of Environment and Climate Strategy (the Ministry) implement and/or support the following improvements to the Recycling Regulation (the Regulation) and Extended Producer Responsibility (EPR) programs in British Columbia as soon as possible.

1. Amend Schedule 2 of the Regulation to expand the list of hazardous wastes. All household hazardous wastes (any product labeled with a hazard symbol) and equivalent commercial products should be included in the Regulation.

Additionally, all **empty** packaging from these products should be included in the Regulation.

- Local governments across the Province spend tax dollars to responsibly manage and dispose of hazardous materials not included in the Regulation; it is past time that consumers and the producers of these products take over the costs.
- Private depots have also been saddled with the added expense and responsibility of trying to manage non-program materials properly.
- Many hazardous materials not included in the current Regulation are disposed of by residents through solid waste disposal facilities, potentially putting solid waste workers, the public, wildlife, ground water and soils at risk.

.../2

2. Update existing Schedules within the Regulation to include:

- sharps,
- veterinary medicines,
- all sizes of lithium-ion batteries,
- off-road tires and tire on rims
- all electronic and electrical items,
- single use propane canisters,
- fire extinguishers,
- plastic household/recreational products that are not included in the packaging and printed paper program, and
- commercial packaging and printed paper.

3. Add a new Schedule(s) to the Regulation to provide for recycling of:

- mattresses and box springs,
- textiles,
- books,
- bulky items/furniture, and
- construction and demolition waste.

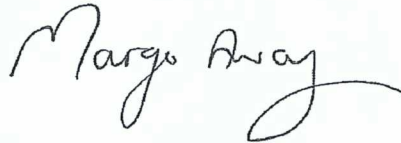
4. Encourage and support any efficiencies within EPR programs that will reduce consumer confusion; minimize consumer fees; reduce greenhouse gas (GHG) emissions; and streamline the drop-off and collection of stewardship products. For example, combining the small appliance, the electronics and the electric outdoor power equipment programs would:

- reduce depot staff training and sorting times;
- make more efficient use of space at depots;
- likely reduce GHG emissions through increased pick-up efficiencies from depots;
- reduce the information consumers are expected to understand;
- reduce local government staff time to understand and educate the public on the differences between the three programs; and
- reduce local government staff time to consult with each stewardship agency.

Solid waste management costs in the Cariboo Regional District will increase as the Region's landfills transition to the new Landfill Criteria. The Cariboo Regional District Board is relying on the Ministry to expand, improve and simplify Extended Producer Responsibility programs in British Columbia in order to eliminate landfill costs associated with materials that can be recycled. This will also reduce risks to workers, the public, wildlife and the environment from landfilling hazardous wastes.

Thank you for considering the Board's request, I look forward to hearing your reply.

Yours truly,

A handwritten signature in black ink, appearing to read "Margo A. Wagner". The signature is fluid and cursive, with a long, sweeping underline that extends to the right.

Margo A. Wagner  
Chair

c: Coralee Oakes, MLA, Cariboo North  
Donna Barnett, MLA, Cariboo-Chilcotin  
Alda Nicmans, Executive Director, BCPSC