



StewardChoice
Producer Solutions

Packaging and Printed Paper Stewardship Service Plan

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www.stewardchoice.ca

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1. StewardChoice

StewardChoice Enterprises Inc. (StewardChoice) proposes to offer a new service to producers supplying packaging and printed paper (PPP) into the British Columbia (BC) market, who are required to comply with Recycling Regulation (B.C. Reg. 449/2004) (**the Regulation**). With the approval of the Plan, producers will be presented a choice for meeting their regulatory requirements through a market-based, results-oriented, locally operated agency that will spur innovation, reduce overall system costs and significantly improve the collection and recycling of PPP in BC.

We believe that:

1. Recycling collection services that residents in BC already have should be maintained and strengthened.
2. Recycling rates for PPP can and will be improved in the households that we serve
3. Stewards should have a choice in how they discharge their obligations under the Regulation

1.1 Maintaining and Expanding Recycling Collection Services in BC

The StewardChoice PPP Stewardship Service Plan (the Plan) will offer producers an opportunity to fulfill their legal obligations by initially providing expanded producer-funded collection and recycling services for PPP generated through BC's multi-family dwellings that are not currently receiving producer-funded services. At this time, our plan is to address multi-family buildings and orphaned municipalities that are not receiving producer-funded collection. Over time as we prove our capabilities, we expect to increase our market share allowing us to expand within a province-wide framework.

Traditionally, recycling performance in multi-family dwellings has lagged behind recycling in single-family households for a number of reasons, including:

- Lack of signage and educational material for residents;
- Location of recycling bins, which are typically centralized on one floor or external to the building versus the convenience of garbage options, which are more prevalent; and
- Bin capacity in multi-family dwelling units tends to be inadequate to store recyclables as compared to single-family homes.

The StewardChoice PPP Stewardship Service Plan will support the Province's waste diversion and recycling objectives by initially focusing on servicing the areas not serviced by the existing compliance program's collection network; thereby increasing the collection and recycling of PPP. This initial focus will not directly affect the start-up phases of the existing compliance program. In fact, it will ensure that recycling services are maintained and enhanced in all households with recycling today.

Each approved stewardship organization will provide recycling services in relation to the quantity of obligated PPP of their respective members and in this way there will be the real possibility of full coverage for the Province of British Columbia.

1.2 Results through a Market-based Approach

The StewardChoice PPP Stewardship Service will implement a market and results-based Stewardship Service that leverages the existing market-driven recycling system. Contracted recycling services companies servicing multi-family dwellings will maintain relationships with their clients and likely see increased business given the goal and opportunity to increase the amount of PPP collected. They will also have the benefit of producer-funded revenue which can be used to offer more competitive pricing and increased level of service to existing and prospective multi-family building owners/managers. This will allow for more investment to expand the total households covered and to promote higher recycling and recovery rates. This can significantly drive down the overall system cost of recycling and spur innovation and investment in the Province.

Ultimately, producers, recycling services companies and other stakeholders within the recycling supply chain will see the benefits of this market-based approach in terms of reduced compliance costs, superior service and a focus on finding innovative solutions to meeting public policy objectives. This will create an incentive for all stewardship organizations to improve recycling performance in the households they serve.

1.3 Giving Producers a Choice in how to meet their Legal Obligations

The StewardChoice PPP Service will allow producers to benefit from customized compliance options that enhance existing waste management and diversion initiatives. It will provide producers of PPP the choice to discharge their obligations through the existing compliance program in BC, through StewardChoice, or through self-compliance or any combination of these choices. Producers joining StewardChoice will have access to flexible, customized compliance options that may include:

- Opportunities to comply through self-managed systems by offering producer- and/or retailer-specific take-back programs for PPP;
- Collection and recycling of materials believed to be “hard-to-recycle”, to meet corporate strategic objectives such as closed-loop recycling and security to clean feedstock; and
- Flexible collection schedules for material waste that is typically generated on a seasonal or inconsistent basis, such as printed directories.

The StewardChoice PPP Stewardship Service will provide producers with an option to comply with **the Regulation**. Through advice and strategic relationships with recycling services companies, producers subscribing to StewardChoice will have a service-oriented and cost-effective option, which will ultimately result in improved environmental and economic results for both producers and citizens in BC.

1.4 Working Alongside Recycling Services Companies

The StewardChoice PPP Stewardship Service will work with recycling services companies that are currently providing collection and recycling service for PPP to multi-family buildings that do not have access to producer-funded collection through the existing compliance program in BC. It will allow these companies to ensure optimal service and efficient cost within the recycling supply chain by utilizing their existing infrastructure and optimization strategies. In return, StewardChoice will require declarations from waste management companies for the amount of PPP collected, sorted and sent for recycling from multi-family buildings. *Table 1* below outlines some of the key benefits to recycling services companies that choose to participate in the StewardChoice PPP service.

Condition	StewardChoice Terms with Recycling Services Companies (RSC)
Ownership of PPP material collected	Owned by RSC
Choice of recycling infrastructure to utilize	Decided by RSC
Payment schedule for collection and recycling	Negotiated with StewardChoice



Condition	StewardChoice Terms with Recycling Services Companies (RSC)
Fines for contamination	Acceptable contamination determined by RSC
Optimization of collection route	Determined by RSC (can optimize)
Treatment of deposit-bearing beverage containers	Value realized by RSC (estimated upwards of \$3,000/tonne)
Choice of collection stream (single stream vs. dual-stream)	Determined by RSC
Acceptable materials for collection/sorting	Determined by RSC and StewardChoice
Penalties for inaccurate/incorrect reporting	Determined by StewardChoice
MRF efficiency factors	Determined by RSC
Bonus (top-up) factors for greater collection volumes	Determined by StewardChoice
Time/resources spent on contracts	Continue/maintain existing waste management service contracts with multi-family building owners/managers
Frequency of collection composition studies	Determined by StewardChoice

Table 1 Service considerations for recycling services companies participating in the StewardChoice PPP service

1.5 System Design

Given that the overall intent of the StewardChoice PPP Stewardship Service is to provide choice and flexibility to producers, recycling services companies, multi-family building owners/managers and other stakeholders within the recycling supply chain, the system design will be administratively simple, easily implementable and acceptable to all parties involved. As such, StewardChoice will develop a user-friendly reporting platform and documentation guidelines for producers to report their sales of obligated PPP in BC. Along with an easy-to-use platform, StewardChoice will work with producers to ensure stewardship reporting is accurate and compliance costs are optimized to reduce any over- or under-reporting. Recycling services companies will also have access to a secure web-based platform to easily submit their PPP tonnage declarations. This platform will be the basis for determining the volumes of PPP collected and recycled and for evaluating the Plan’s performance against performance objectives.

2. Existing Market

2.1 Recycling Regulation

The policy of the British Columbia (BC) government is to shift responsibility for the financing and management of recovery systems for consumer products and packaging away from local government to producers and consumers. This extended producer responsibility (EPR) policy is authorized under the Environmental Management Act (EMA), and in **the Regulation** that was approved by Order in Council 995/2004 and came into effect October 7, 2004.

Producers of PPP became obligated under Schedule 5 of **the Regulation** as of May 14, 2011. **The Regulation** stipulates that a producer of PPP must have an approved plan under Part 2 and must comply with the approved plan. To satisfy this requirement, producers are required to appoint an agency to carry out the duties of the producer. The agency must confirm to the director the duties that the agency will perform on behalf of each producer that has joined the agency.

For purposes of this draft PPP Stewardship Service Plan, StewardChoice offers to perform the duties of an agency on behalf of producers of PPP obligated under **the Regulation** (and not exempted under the small business policy) that wish and are capable of appointing StewardChoice as their agency of choice. This draft Plan will be used as the basis of public consultation, and will be amended as needed to produce a final PPP Stewardship Service Plan.



2.2 Existing Compliance Market

Collection services for PPP in BC had previously been operated under either contracts from local governments for curbside and/or depot collection for single and multi-family residential collection or through private contracts between collection organizations such as recycling services companies or not-for-profit entities and the owners/managers of multi-family buildings. The private contracts between recycling services companies and multi-family building owners/managers are referred to as the “open” market for multi-family dwellings.

Most local governments (but not all) and many private depot operators are currently receiving producer funded collection and recycling services for PPP under an existing compliance program in BC. Recycling services companies that had been providing collection and recycling services to local governments agreed to enable the local governments to participate in the existing PPP compliance program. In many cases this agreement included multi-family collection that had been previously serviced through local authorities. However, most of these recycling services companies retained their contract rights for multi-family dwellings in the “open” market. Therefore, these dwellings do not currently receive producer-funded collection services.

This is the expanded service area StewardChoice will initially cover.

StewardChoice estimates that 120,000 or approximately 20% of multi-family dwelling units do not receive producer-funded collection and recycling services for PPP. StewardChoice proposes to work with recycling services companies to provide producer financing to these multi-family buildings and their residents. Providing this service will expand the coverage of the producer-funded system for collection of PPP in BC. In time, the StewardChoice PPP Stewardship Service Plan will bring added investment and jobs to BC’s recycling industry.

3. Service Offering

3.1 Materials Covered Under the Plan

StewardChoice will work with recycling services companies and their customers to maintain current levels of service as well as provide the flexibility to increase the collection of any obligated PPP materials made out of paper, plastic, glass and metal.

StewardChoice has adopted the principle of “no going back” hence, multi-family buildings that are currently being served by a private recycling services company, will not have any changes made to their list of acceptable packing and printed paper. We may add materials but we will not remove any materials already being collected.

StewardChoice has made the commitment to maintain source separated material so that these materials once separated by the resident will not later be comingled with waste.

In conjunction with participating recycling services companies, StewardChoice will continuously review the materials list of PPP to be collected and evaluate the option to revise the material list based on the following factors:

- Composition of StewardChoice producer members;
- Material recyclability and cost implications;
- Ability to find well-functioning end-markets; and
- “Difficult-to-recycle” materials that some recycling services companies may wish to adopt.

3.2 Collection System

The StewardChoice PPP Stewardship Service will leverage our experience designing effective collection systems for multi-family buildings to expand the amount and types of PPP collected per dwelling. StewardChoice collection contracts will ensure the continuation of curbside service for PPP for residents where this service exists when the Plan commences operation. As well, local government currently providing collection services will have the option to continue or to discontinue provision of these services once the StewardChoice Stewardship Service Plan commences operation. In the event a local government chooses to discontinue service delivery, StewardChoice and its recycling service providers will make the necessary arrangements to ensure that residents receive the same and/or enhanced service without disruption.

3.3 Market Footprint

The StewardChoice PPP Stewardship Service will initially focus on providing producer funding and service to the 120,000 multi-family dwellings, in the “open” market that are not currently serviced by the existing compliance program.

As the StewardChoice program grows, consideration will be made to expanding service to other underserved communities, public spaces (streetscape), single-family residences in communities that choose StewardChoice as their service provider. StewardChoice is committed to working with other agencies to ensure that communities across BC receive producer funded service. *Table 2* highlights the targeted number of dwelling units that will be serviced in the first and third years of operation, as well as the approximate tonnage that will be collected from servicing these multi-family buildings.

	Year 1	Year 3
Dwelling Units Served	120,000	350,000
PPP Collected Multi-Family	7,900 MT	25,000 MT

Table 2: Number of dwelling units serviced and estimated tonnage collected under the StewardChoice PPP Stewardship Service during the first and third years of operation.

3.4 Consumer Awareness and Access

Since the initial focus for the collection of PPP will be with multi-family buildings that are currently serviced by contracted recycling services companies, the first phase of the Plan will provide targeted communication to the residents of these buildings, advising of the introduction and benefits of the producer-funded collection service and the list of materials eligible for recycling. Further promotion and education campaigns will be introduced as initiatives are undertaken to increase the capture rate of PPP within each dwelling unit and building.

3.5 Optimized Multi-family and Return-to-Retail Collection Options

StewardChoice will work with existing recycling services companies to enhance the collection options for residents of multi-family buildings. This will include the consideration of the implementation of a “mini-bin” system that involves a small bin that can be placed under the kitchen sink, making it more convenient for residents to transport their recyclables from their dwelling to a central collection point on the main floor or outside the building. This alternative to the collection system has already been tested in BC by StewardChoice and its affiliated companies. Discussions will continue with recycling services companies to determine other alternate multi-family collection methods that will enhance convenience and increase the recovery rate from multi-family dwellings.

StewardChoice will also support and encourage producer self-compliance and in its contracts with producers, will recognize the portion of material that is collected through self-compliance (often accomplished through return-to-retail). Some retailers in BC have shown how this can be done successfully and StewardChoice recognizes that the costs of collecting these materials in this manner are not part of the regular multi-family dwellings collection cost. This option also allows the producer to market this service to the consumer directly providing another channel of recycling promotion and convenience to consumers.

3.6 Timelines for Implementation and the Overall Effectiveness of the Plan

Since StewardChoice is contracting with recycling services companies that are currently servicing multi-family buildings, the Plan's timelines are flexible and the PPP Stewardship Service has the ability to launch on short notice. Currently, the expected timelines for the PPP Stewardship Service are as follows:

Date	Milestone
June 2014	StewardChoice will release a Draft PPP Stewardship Service Plan and initiate consultation with producers and other stakeholders.
Q3 2014	StewardChoice will submit the Plan to the Ministry of Environment for approval.
Q1 2015	Upon approval of the Plan, StewardChoice will launch the Stewardship Service through an organization based and managed in BC.

StewardChoice is committed to maintaining an up-to-date Stewardship Plan, and as such, will review and update the Plan as necessary every five (5) years in which the Service is in operation (or such other time as established by the BC Ministry of Environment).

3.7 Annual Reports

StewardChoice will collect data to produce annual reports to be published on the StewardChoice website by July 1st for each preceding year. The annual reports will document the performance of the PPP Stewardship Service in relation to the Plan. StewardChoice will report on the following data:

- *Educational materials and strategies* that have been developed for the StewardChoice PPP Stewardship Service and/or materials that have been developed by contract recycling services companies to educate residents of multi-family dwellings on the environmental and economic benefits of the PPP service and motivate residents to increase recycling. The annual report will also provide information to residents of any changes that have been made to the packaging supply chain and collection and recycling system.
- *Actions to reduce environmental impacts* that have been implemented by producers to reduce environmental impacts and improve the end-of-life management of PPP;
- *Management of materials in the system* by identifying the percentage of PPP tonnes that have been managed through reuse, recycling and disposal;
- *Performance targets* will be published to compare the Stewardship Service's performance to the targets that will be developed; and
- *Recovery rates* that will include the total amount of PPP collected and recovered through the StewardChoice Stewardship Service. In addition, the annual report will include a map

highlighting the areas that receive collection funded by producers through the StewardChoice service and the increased access residents have through this Plan.

- [Number and location of buildings and households serviced that have entered formal agreements with StewardChoice.](#)

StewardChoice will provide third party reasonable assurance for non-financial information published in the reports on data pertaining to the number and location of collection facilities, the total amount of product sold and collected and product management in accordance with the pollution prevention hierarchy and the Plan's performance targets in relation to Section 8(2)(b), (d) and (e) of **the Regulation**.

Producers participating in the StewardChoice plan do not expect to apply consumer fees that are associated with the plan and that are charged and identified separately on the consumer receipt. Therefore, StewardChoice is not required under **the Regulation** to make public its financial statements. StewardChoice, being a wholly owned subsidiary of Reclay StewardEdge, will disclose the information necessary to comply with disclosure laws that apply to private, for-profit enterprises.

3.8 Dispute Resolution

StewardChoice is committed to resolving disputes in a fast, cost-effective and inclusive manner. StewardChoice will work to incorporate the principles of access, community participation, individual satisfaction, equality, quality of resolution and efficiency into dispute resolution procedures.

Depending on the nature of the dispute and the parties involved, StewardChoice will use the following procedures:

Party	Resolution Procedures
<ol style="list-style-type: none"> 1. Resident 2. Multi-Family Building Owners/Managers 	<ul style="list-style-type: none"> - If a dispute arises between a contract recycling services company and resident and/or a multi-family building owner/manager that is serviced under the collection agreement, the dispute resolution process will follow the procedures as outlined in the service agreement provided by the recycling services company.
<ol style="list-style-type: none"> 1. Producer Recycling Services Company / Processor 2. Other Stewardship Agency 3. Government Entity 	<ul style="list-style-type: none"> - The parties, with representatives from StewardChoice, will work to resolve the dispute through negotiation to come to a mutually agreed upon solution within thirty (30) days of written notice. - If the parties and representatives from StewardChoice cannot come to an agreement, the Board of Directors will work to resolve the dispute through negotiation to come to a mutually agreed upon solution within thirty (30) days of written notice. - The parties will engage in mediation in an attempt to resolve the issue in a consensual manner if the parties and Board of Directors are unable to do so. - If mediation fails to remedy the dispute, arbitration will be used in which an arbitrator will render a decision on the dispute.

4. Co-operation with Other Stewardship Agencies

StewardChoice shares the goals and interests of all BC based stewardship agencies to cooperate wherever possible with the goal of improving recycling performance, making recycling more accessible, convenient and harmonized for consumers and more effective for producers at the most reasonable cost. StewardChoice will cooperate with all stewardship agencies involved with the Stewardship Agencies of British Columbia (SABC). It will, for example, explore to what extent it can share and exchange promotion and education materials and concepts with other stewardship agencies.

In particular, StewardChoice will work with existing PPP compliance program(s) to ensure that if a producer discharges part of its obligation with one agency and the remainder through another agency there is communication between the agencies, to ensure that all of the producer's obligated material is reported, without fee duplication, or "double reporting".

An additional benefit of this interagency co-operation is the very direct incentive created to expand PPP collection to reach the target of collecting at least 75% of the PPP placed into the market by each producer in proportion to that producer's obligated share of collection.

The interface between the StewardChoice PPP Stewardship Service, the existing compliance program and other PPP programs will be collaborative and as simple as possible to allow choice for producers and encourage market competition for collectors and recyclers. The Ministry of Environment would not need to have a direct role in managing the interface between the PPP programs. A clearinghouse or reconciliation type mechanism will also not be required. The mechanism to ensure fairness between programs already exists in that each program is required to provide annual, independent third party assurance of the quantities of material that is supplied and managed in BC.

To ensure co-operation and harmonization of the existing PPP programs, StewardChoice proposes that, at a minimum the following principles are applied to ensure a level playing field for all PPP programs in BC:

1. Maintain curbside collection to residents that currently receive this service and expand service where feasible;
2. Provide local governments that currently manage collection service the first right of refusal to continue this service;
3. Collect 75% of the tonnes generated by each agency's appointed producers, or another recovery rate established by the Director that applies equally to all programs;
4. Compliance with each agency's own PPP Stewardship Plan [including the performance measures as set out in the Plan and agreed with government](#)

5. Performance Measures

5.1 Recovery Rate

StewardChoice will enroll producers and will ensure collection of an amount of PPP such that an annual recovery rate of 75%, or another recovery rate established by the director, is achieved for the PPP product category covered by the Plan. The recovery rate will be calculated as follows:

$$\text{Recovery Rate} = \frac{\text{Amount of Product Collected (under contract with StewardChoice)}}{\text{Amount of Product Generated (licensed by Producers to StewardChoice)}}$$

StewardChoice acknowledges the ministry's requirement to provide third party reasonable assurance declarations for non-financial information, including the management and/or "end fate" of product collected and the total amount of product sold and collected. Taken together, this reporting on material



weights sold or distributed into the BC market and weights collected under the Plan will allow the ministry to compute an overall rate for those producers that are part of the StewardChoice approved Plan.

StewardChoice will identify other multi-family performance measures such as per capita collection rates, generation rates by residents and the composition of collected and discarded materials. Following two (2) full years of operation, benchmarks and targets for these measures will be reported on through the remaining three (3) years, of the five (5) year Plan.

5.2 Assessing Performance on Costs and Environmental Outcomes

StewardChoice and affiliated companies have extensive experience conducting external independent compliance reviews for obligated producers to identify compliance risk factors and opportunities to improve packaging data tracking and reporting procedures. In addition, experience in managing stewardship compliance reporting on behalf of clients, including calculation of product data, calculation of fees and associated reporting requirements have ensured producer obligations are met in the most cost effective manner. These experiences will be used to develop a user-friendly reporting system that allows producers to manage their regulatory obligations efficiently.

5.3 Reduce PPP through Systems Design and Supply Chain Optimization

The management of PPP through the supply chain has economic and environmental impacts on producers and citizens in BC. Producers that can lessen the amount of PPP that they generate will lower their compliance costs. Furthermore, producers that can optimize PPP design or supply chain so that less PPP is used and more is designed for reuse and/or recycling will also lower their compliance costs. StewardChoice and its affiliated companies have global experience in helping producers manage the life-cycle impacts of their products and complying with packaging stewardship laws. As a value added service, StewardChoice and its affiliated companies will work with producers that put PPP into the BC marketplace to reduce their compliance costs through systems-based design and supply chain optimization.

6. Consultation

Prior to submission to the Ministry of Environment, StewardChoice will engage in public consultation with stakeholders. StewardChoice will consider the following possibilities:

- Direct consultation with MMBC and other stewardship agencies.
- Direct consultation with potential PPP stewards including Canada's National Brewers and representatives of the national and local newspapers.
- Consultation with local governments through the Union of British Columbia Municipalities and British Columbia Product Stewardship Council
- Public Consultation through a series of webinars advertised through RCBC and social media.
- Direct consultation with business associations such as Business Council of British Columbia, British Columbia Chamber of Commerce, Waste Management Association of British Columbia, Canadian Federation of Independent Business , Canadian Federation of Independent Grocers , Vancouver Board of Trade, British Columbia Food Processors, British Columbia Agriculture Council and the Stewardship Agencies of British Columbia (SABC) and others.
- Direct consultation with organizations representing or involved in the management of multi-family buildings such as the Condominium Home Owners Association of British Columbia, Vancouver Island Strata Owners Association and the Condo Owners Association of British Columbia.
- Consultation with recycling services companies.



StewardChoice is committed to conducting extensive publicity for the proposed webinar series, to ensure broad participation. Furthermore, StewardChoice will undertake additional consultation if and where stakeholder groups come forward to the BC Ministry of Environment or to StewardChoice with such a request.

StewardChoice is excited to present this Draft PPP Stewardship Service Plan to stakeholders in British Columbia for consideration. The Plan gives producers a choice on fulfilling their legal obligations under **the Regulation**, through a producer-funded collection and recycling service by contracting with recycling services companies to initially provide expanded producer-funded service to multi-family dwellings. The Plan presents a market-based approach to PPP stewardship, creating an inclusive and cost-effective service. As such, StewardChoice will initiate public consultation and encourage the participation of stakeholders with differing views on the Plan. After the consultation process is complete and prior to submission to the Ministry of Environment StewardChoice will take into consideration the feedback received and amend the Plan as needed.

1. Summary of Stakeholder Comments

Stakeholders have addressed comments and questions using a variety of tools:

- Participated in the webinar consultations held on August 26, 2014 and September 9, 2014;
- Submitted questions and comments using the Contact Us Form available on the StewardChoice website;
- Submitted comments by email to info@stewardchoice.ca
- Submitted comments directly to the Development Director

Attachment A provides questions and comments posted by stakeholders during the webinars and it includes StewardChoice responses which were provided both verbally and in writing.

Attachment B provides written submissions received via website and direct email. The table also includes StewardChoice responses and a note indicating where the comments resulted in revisions to the PPP Stewardship Plan and where comments relate to implementation activities. All stakeholders who submitted questions and/or comments will receive a response by email.

The following sections summarize key themes from the stakeholder submissions:

1.1. Producers

While submissions from producers raised company or sector specific issues, a number of common themes were identified as follows:

- Understanding the pathway to compliance for the PPP Recycling Regulation under a multiple-agency framework
- Ability to evaluate the benefits of each agency, particularly when comparing producer compliance costs with each agency
- Assurance that duplicate reporting and fee payments are not required

1.2. Local Governments

Submissions from local governments often raised issues specific to their existing collection contract however; a number of common themes were identified as follows:

- Assurance that the integrity of separated materials will be maintained at the point of collection
- Understanding of StewardChoice's operating principles for contracting with private recycling service companies and/or local governments
- Interest in StewardChoice intentions to expand its coverage area and to offer producer funded collection to single family residences and other under serviced area

1.3. Private Companies

Submissions from private companies commented on aspects of the PPP Stewardship Plan that affect their choice and continuity of contracts however; a number of common themes were identified as follows:

- Understanding StewardChoice's recycling supply chain management particularly, the ownership and downstream flow of materials collected under contract
- Clarity on the audit and documentation required to receive payments from StewardChoice

2. Attachments

2.1 Attachment A – Webinar Questions, Comments and Responses

Attachment A – Webinar Questions, Comments and Responses				
Name	Affiliation	Questions/Comments	Responses with Reference to the Area in our Plan Where this Question is also Covered	Amendment Required to Draft Plan
Greg Wilson	Retail Council of Canada	Are you going to respond to all questions asked at this webinar (those you were able to answer and those that were not answered) and post them on your site during this consultation period?	Thank you for this question. Yes, we will answer all of the questions and post all of the questions and answers on our website after September 9th.	n/a
Greg Wilson	Retail Council of Canada	Will you publish your fee schedule and can you confirm that all stewards will pay the same material fees?	We will not have a fee schedule but we will negotiate the cost for each producer in order to meet their compliance mandate. <u>Sections: 1.3, 1.5</u>	No
Mr. Gill	Fraser Plastics	Other than BFI, do you have any other companies on board?	Progressive Waste Solutions (BFI) is the first recycling services provider to enter into an agreement with StewardChoice. We anticipate there will be other recycling services companies that will also participate.	n/a
Suzanne Bycraft	City of Richmond	What about those producers that are already part of the MMBC plan? Will these producers also be able to join StewardChoice?	Producers that have signed a membership agreement with MMBC can choose to subscribe to StewardChoice provided they give proper notice to MMBC. MMBC would need to advise those producers whether any penalties apply.	n/a
Suzanne Bycraft	City of Richmond	How are you intending to establish your incentives and are they fixed or negotiated?	The incentives will be market based and negotiated with each recycling services provider. <u>Section: 1.4</u>	No
Mr. Gill	Fraser Plastics	What is the estimated breakdown of the tons collected? For example what percentage is anticipated to be HDPE plastic, PET plastic, paper and glass etc.?	We anticipate that it will reflect the normal mix of all of these materials generated in residential households. <u>Section: 3.1</u>	No
Ed Walsh	Emterra Environmental	As a processor I would like to find out the rules of engagement. With the service you provide, do you provide any specific grade of material to satisfy the end market?	In our posted Stewardship Services Plan we generally describe the terms that StewardChoice will have with recycling services companies. <u>Section: 1.4</u>	No

Attachment A – Webinar Questions, Comments and Responses				
Name	Affiliation	Questions/Comments	Responses with Reference to the Area in our Plan Where this Question is also Covered	Amendment Required to Draft Plan
Catherine McVitty	Unilever	You say you will be price competitive - what do you expect your fees to be in comparison to the existing fees under the current PPP program?	Based on our open market model, we anticipate that compliance costs will be lower than the current PPP program. <u>Section 1.2</u>	No
Mr. Gill	Fraser Plastics	Will you be contracting directly with multi-family homes or will you contract ONLY with recycling companies that have contracts with those multi-family homes? And how long will these contracts be? For example 1 year, 5 years?	We will be contracting with the recycling services companies that serve multi-family buildings. If a multi-family building does not currently receive producer-funded services, then our contracted recycling services companies would be pleased to enter into an agreement with those buildings. The length of contract is negotiated between the recycling services company and property management. <u>Sections: 1.4,3.3</u>	No
Mr. Gill	Fraser Plastics	Are you or will you eventually compete with MMBC or will you always have your own specific "territory"?	At this time, our plan is to address multi-family buildings and orphaned municipalities that are not receiving producer-funded collection. Over time as we prove our capabilities, we expect to increase our market share allowing us to expand within a province-wide framework. <u>Sections:1.1 as amended,3.3</u>	Yes. See amended section 1.1
Verne Kucy	City of Coquitlam	Are the currently unserved 120,000 multi-family units all located in the Lower Mainland or are they spread out over the Province?	They are spread out over the province although, the majority reside in the Lower Mainland and the Capital Regional District.	n/a
Suzanne Bycraft	City of Richmond	Who is responsible for processing and marketing of collected PPP? Who retains ownership of the materials?	As per the StewardChoice Stewardship Services Plan, contracted recycling services companies are responsible for processing and marketing collected material therefore they will retain ownership of the material as they currently do. <u>Section: 1.4</u>	No
Mr. Gill	Fraser Plastics	Are you or do you have any interest in ensuring that the material collected is marketed fairly?	Our model is based on open market principles and we do not intend to interfere in the recycling supply chain. <u>Section: 1.4</u>	No

Attachment A – Webinar Questions, Comments and Responses				
Name	Affiliation	Questions/Comments	Responses with Reference to the Area in our Plan Where this Question is also Covered	Amendment Required to Draft Plan
Suzanne Bycraft	City of Richmond	Will this presentation along with any Q&A answered today be made available on hard or soft copy?	Yes, this presentation and the Q&A will be posted on the StewardChoice website after September 9th.	n/a
George Jasper	Waste Control Services and Recycling Inc	Can the recycling service collector continue to charge the multi-family building directly a prorated amount for the recycling services (i.e. enhanced services such as service twice weekly, pull-up service)?	The recycling services provider will have the flexibility to negotiate any services with multi-family buildings on a competitive basis. <u>Section:1.4</u>	No
Catherine McVitty	Unilever	Are you able to provide some indication on fee rates?	The cost of compliance will be negotiated directly with each producer. <u>Section:1.3</u>	No
Jeff Ainge	Regional District of Nanaimo	Would a GBN processor be able to send the MMBC "contamination" (e.g. plastic bags) to a StewardChoice processor?	Recycling service providers in our system are free to accept material from any source they choose to receive it from. <u>Section: 1.4</u>	No
Angela Paley	Recycling Council of BC	Neil, do you have any examples of communities who are not receiving curbside now that could under your program?	There are a number of communities that are currently not receiving producer-funded recycling services. These communities could choose to receive producer funded recycling services through the StewardChoice Stewardship Services Plan. <u>Section: 1.1</u>	No
Monica Kosmak	City of Vancouver	Can you please repost the slide with the flow chart of how the system works? It went by quickly.	StewardChoice will post the entire slide presentation shortly after the webinar. Along with the presentations, you will be able to view all of the questions and answers received throughout the consultation process on www.stewardchoice.ca .	n/a
Sharon Horsburg	Regional District of Nanaimo	The issue of plastic bags continues to be a problem in the curbside program. Residents use them for shredded paper even though our program does not accept them even prior to the switch to MMBC. Will StewardChoice be able to handle plastic bags at curbside and in multi-family settings or will you continue to require plastic bags to be taken to drop off depots?	StewardChoice has adopted the principle of “no going back” hence, multi-family buildings that are currently being served by a private recycling services company, will not have any changes made to their list of acceptable packing and printed paper. We may add materials but we will not remove any materials already being collected. <u>Sections: 1.2, 1.4, 3.1 as amended</u>	Yes. See amended Section 3.1

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Name	Affiliation	Questions/Comments	Responses with Reference to the Area in our Plan Where this Question is also Covered	Amendment Required to Draft Plan
Calla Farn	McCain Foods	StewardChoice is a for-profit operation. The other agency is not. How do you propose to reduce costs for producers when you serve the hardest-to-reach (most expensive) regions, and do not retain ownership of the materials (which could be used to offset costs) while making a profit?	By employing an open market model and allowing collectors and processors to own the material and leverage their existing collection and recycling system, we believe we can operate more efficiently than a supply management model. Private industry is typically more innovative, nimble and commercially driven and that is how we can be competitive. <u>Section: 1.2, 1.3</u>	No
Calla Farn	McCain Foods	All other areas in Canada use one agency so producers are not paying for duplicate services, duplicate processes, etc. Every new agency, program and system represents added costs. How will you reduce recycling costs for producers?	In all other areas of business in Canada competitive systems and competitive businesses help reduce costs. This principle, dominant throughout our economy, can also be applied successfully to the area of stewardship compliance. This has been demonstrated in other countries and when one views it as a business, it makes logical sense in Canada as well. <u>Section: 1.2</u>	No
Calla Farn	McCain Foods	Negotiating fees with individual producers does not create a level playing field. How is this justified?	We're using the multiple agency model which allows us the flexibility to negotiate producer costs based on a tailored contract, therefore there are no standardized "fees". There will be producer program costs. Producers can choose compliance options on the basis of performance and cost and customized compliance solutions (e.g. Return to retail, customized pick up days). We will operate under normal commercial contract terms and offer a non-exclusive agreement. <u>Section: 1.3</u>	No
Calla Farn	McCain Foods	Many producers see ownership of the materials as the single most important factor in controlling future costs. Without the materials to offset costs, they will simply increase year after year. How do you propose to control rising costs?	While we recognize that some producers and some operators of stewardship agencies do believe that retaining ownership of material is key to controlling costs, we have not yet seen this demonstrated in Canada. In our model, which includes incentives for collectors and processors and not penalties, we can achieve a more flexible and cost-effective system. Through our wealth of experience in designing and implementing	No

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			producer responsibility systems in Canada and Europe, we have learned that “influence” over the recycling system is far more manageable, practical and reduces price volatility risks for producers more than a “direct control” supply management regime. <u>Section: 1.4</u>	
Calla Farn	McCain Foods	What indications have you received from the BC government that it will approve your plan by end of this year?	StewardChoice is following the plan approval procedures described by the BC government, which states that StewardChoice must first consult with stakeholders before submitting our plan for approval. Our goal is to have the BC government approve our plan so that we can commence operations on January 1, 2015. <u>Sections: 3.6, 6</u>	No
Calla Farn	McCain Foods	If you collect all materials, but only certain brands are members, who pays for the collection and recycling of the materials of producers who are not members?	Similar to the methodology developed by the existing PPP stewardship agency in British Columbia, StewardChoice proposes to collect and recycle 75% of the equivalent PPP sold into British Columbia by their subscribed producers. Plan <u>Section: 5.1</u>	No
Calla Farn	McCain Foods	You will know the other agency's fees because they are made public. What is stopping you from simply undercutting them until they disappear and then raise prices as Air Canada typically deals with its competitors?	Experience from Europe has demonstrated that after the introduction of competitive compliance schemes for packaging waste, the overall system cost was significantly reduced. We anticipate that with the approval of the StewardChoice Plan and its implementation, costs for all producers will eventually be reduced. It is normal in a competitive market for all competitors to become more innovative in order to better serve their customers. <u>Section: 5.3</u>	No
Chantale Mantha	Costco Wholesale Canada	How would a producer report their material? By weight? Quantity? How would a retailer who is deemed a producer	StewardChoice will be transparent about which producers are subscribed to our program. This will ensure that there is no double reporting. The charge to a producer will be negotiated	No

Attachment A – Webinar Questions, Comments and Responses				
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		know which brands or other producers they can exempt when reporting in order to avoid double reporting and payment?	with the producer on a normal commercial basis. The volume and type of material the producer places on the market will be a factor in these negotiations. <u>Sections: 1.3, 3.1,4</u>	
Jeff Leung	Staples	If SC does not publicize the fee schedule, how can each producer/companies decide to switch to SC?	StewardChoice representatives will meet with producers individually and discuss what their costs will be based on the mix of materials and the volume of PPP put onto the marketplace by each producer. Producers can make the decision to choose StewardChoice on the merits of our service offering and cost of compliance. <u>Section: 1.3</u>	No
Philippe Cantin	Retail Council of Canada	In terms of governance, who would be sitting on SC's Board of Directors? Are you thinking of allocating a fixed number of board seats to different types of stewards (producers, retailers, processors, etc.)?	The Board will consist of individuals representing the owners of StewardChoice as well as other BC based directors chosen for their skill sets. StewardChoice is not required to represent different stakeholder groups on its Board of Directors because it is a private business however; StewardChoice will create an advisory committee with a balanced set of stakeholder members. <u>Section: 3.7</u>	No
Philippe Cantin	Retail Council of Canada	How would the agreements with 'multi-dwellings in an open market situation' work? Will this mean that collectors will offer lower costs for those residential units just like the current model for municipalities? If their costs are expected to remain the same, how can this be considered an EPR approach? If you are expecting cost decreases for building owners, how would SC ensure that a collector who joined the program lowers the collection costs for the clients?	Contract details between building managers and/or strata council will be negotiated with their Recycling Service Company. <u>Section: 1.4</u>	No
Philippe Cantin	Retail Council of Canada	How will you plan your organization's budget if fees vary from one steward to another?	We have developed our budget projections based on the number of multi-family buildings we believe can be included in the StewardChoice plan therefore; we have determined a	No

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			minimum compliance charge for producers that would cover collection and recycling costs. <u>Section: 3.3</u>	
Philippe Cantin	Retail Council of Canada	Will all Q&A's be available to participants like what was done after the previous session?	Yes, all Q&A's will be made available.	n/a
Dave Douglas	VisionQuest	Will we be able to obtain copies of slides? Thanks.	Yes, the slides will be loaded on the StewardChoice website by the end of this week.	n/a
Dave Douglas	VisionQuest	Is there a movement underway to include the IC&I sector under the regulations?	This is a decision that can be made by the BC provincial government. Today, our StewardChoice Stewardship Services Plan is to comply with the existing regulation which does not currently regulate PPP in the IC&I sector. <u>Section: 2.1</u>	No
Dave Douglas	VisionQuest	Does StewardChoice envision transition to a utility based funding model (off of municipal tax base) - similar to US models?	No. StewardChoice proposes to fund the program through producers who have chosen StewardChoice as their agency. These amounts will be negotiated on a commercial, business-to-business basis. <u>Section: 1.3</u>	No
Mark Startup	Retail Council of Canada	How can Steward Choice guarantee that stewards and collectors will be able to enter the program within a reasonable time?	We anticipate that our operations will commence in January 2015. We expect to start with a certain number of producers and recycling service companies to serve multi-family buildings that are not currently receiving a producer-funded service. We recognize that producers may have already signed contracts with another agency and this will impact when they are able to choose StewardChoice as their agency. <u>Section: 3.6</u>	No
Mark Startup	Retail Council of Canada	How can retailers tell whether a voluntary steward is registered with your plan or with MMBC? Are you going to have access to	StewardChoice will publish a list of producers that are subscribed to our plan and we anticipate the other agency will do	No

Attachment A – Webinar Questions, Comments and Responses				
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		the lists of stewards in both organizations? If not, how does one determine who the 1st importer is in order to comply with the law? Retailers might end up paying twice for the same product if they don't have access to the list of voluntary stewards.	the same. A retailer would look at both lists to tell whether a particular producer or voluntary steward is subscribed to one of the plans. If the particular non-resident BC company is not listed with either agency, the retailer becomes the First Importer. We believe retailers must have the list of voluntary stewards from both agencies. <u>Section: 4</u>	
Mark Startup	Retail Council of Canada	Will stewards with MMBC be allowed to access your lists of stewards?	Yes, our list of stewards will be transparent. <u>Section: 4</u>	No
Verne Kucy	City of Coquitlam	If the Province does not agree to StewardChoice's list pre-conditions to "level the playing field", what are the implications for going forward with their plan?	We believe that a level playing field is necessary and we believe that the Province of BC will find our definition of a level playing field to be reasonable. <u>Section: 4 as amended</u>	Yes. See amended Section 4
Nathalie St-Pierre	Conseil Canadien du Commerce de Detail	So you mean a producer paid program, controlled by recycling services (as per you governance structure) where all the material is owned by recycling services?	StewardChoice Enterprises Inc. is a private company that will contract with recycling service companies, but it is not controlled by recycling service companies. We have designed a system which will give producers a choice that is cost-effective and more flexible than the alternative. <u>Section: 1.3</u>	No
Debbie Fleming	Township of Langley	Will you provide copies of the presentation slides?	Yes, copies of the slides are posted on the StewardChoice website.	n/a
Rachel Kagan	Food and Consumer Products of Canada	What is the rationale for not having a fee schedule for your proposed program?	In a competitive open market and a multiple agency model, producer program costs and contracts are flexible, negotiable, and non-exclusive whereas, a single agency uses a rigid standardized approach for all businesses. We prefer to use a tailored approach as opposed to applying a universal method for calculating producer compliance costs. <u>Section: 1.3</u>	No

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Name	Affiliation	Questions/Comments	Responses with Reference to the Area in our Plan Where this Question is also Covered	Amendment Required to Draft Plan
Rachel Kagan	Food and Consumer Products of Canada	How will you ensure fees or cost information is provided to each producer on a timely basis so they can budget their obligation accordingly?	StewardChoice will be flexible as to when producers can join our program. We will be open to discussing compliance costs with producers for budgeting purposes. <u>Sections: 1.1, 1.2, 1.3</u>	No
Rachel Kagan	Food and Consumer Products of Canada	Can the methodology or process of negotiation of individual producer obligations be shared? I.e. how will costs be calculated?	StewardChoice will negotiate the cost of compliance based on the volume and type of material a producer places onto the market. Costs are calculated based on all of StewardChoice's input costs in a normal commercial manner. <u>Section: 1.3</u>	No

2.2 Attachment B – Submissions and Responses Submitted by September 12, 2014

Attachment B – Submissions and Responses Submitted by September 12, 2014			
Sector	Question/Comments	Response with Reference to the Area in our Plan Where this Question is also Covered	Amendment Required to Draft Plan
City of Vancouver	<p>Design</p> <ul style="list-style-type: none"> How will the StewardChoice plan encourage producers to reduce PPP, or design packaging to be reused or recycled? How would StewardChoice reward producers for these investments? How will StewardChoice make producers responsible for non-recyclable PPP or PPP with low market value, given that StewardChoice producers will not bear the risk of fluctuating recycling markets? What R&D initiatives will StewardChoice undertake to expand recycling markets for hard-to-recycle materials? 	<p>Design</p> <p><u>Section 5.3</u> of our Plan outlines how StewardChoice will reduce PPP through system design and supply chain optimization</p> <p>The Regulation requires producers to pay for the costs of collecting and managing the PPP that they put on the marketplace. StewardChoice will collect packaging and pass the costs on to producers. Producers that put less</p>	No

Attachment B – Submissions and Responses Submitted by September 12, 2014			
Sector	Question/Comments	Response with Reference to the Area in our Plan Where this Question is also Covered	Amendment Required to Draft Plan
	<p>Relationship with local governments</p> <ul style="list-style-type: none"> Does StewardChoice intend to engage local governments as collectors? If so would it be for single-family curbside, multi-family, and/or depots? Local governments are referred to in the plan but the nature and timing of the relationship is unclear. 	<p>PPP on the market or choose materials that are more recyclable will lower their compliance costs. In addition, StewardChoice and its parent organizations are experienced at providing supply chain management services to producers. Producers can choose to engage StewardChoice to provide supply chain management advice and lower their compliance costs. <u>Section 5.3</u> of our Plan outlines how we intend to provide system design and supply chain optimization services to the Producers that choose StewardChoice. StewardChoice will negotiate agreements that are tailored to meet the needs of the Producer at its products, including difficult to recycle PPP. Materials with low market value do impact system costs and therefore costs to producers. <u>Section 1.4</u> of our Plan outlines how we intend to work alongside Recycling Services Companies to optimize the recycling supply chain. The market based approach will mean that StewardChoice will only pay for the PPP recycled, which provides an incentive for RSC to maximize recycling. The investments in recycling R&D will be made by the RSC companies who stand to benefit from those investments. Additionally, StewardChoice will explore with RSC the inclusion of difficult to recycle materials, likely to begin with test pilot projects.</p> <p>Relationship with Local Governments Yes, we have received a significant amount of positive feedback from local governments that would like to have choices in the PPP producer agencies that they work with. While our initial focus is to fill the gaps in the</p>	<p>Yes. See amended section 1.1</p>

Attachment B – Submissions and Responses Submitted by September 12, 2014			
Sector	Question/Comments	Response with Reference to the Area in our Plan Where this Question is also Covered	Amendment Required to Draft Plan
	<ul style="list-style-type: none"> If StewardChoice does intend to engage local governments, what process do you envision for negotiating and establishing agreements? <p>Multi-family buildings</p> <ul style="list-style-type: none"> Does StewardChoice intend to contract exclusively with private haulers for individual buildings in an “open market” model? What happens where municipalities contract out multi-family collection, but not under contract to another PPP stewardship agency? Where multi-family buildings are on the “open market” (without municipal collection), how would StewardChoice work with other PPP stewardship agencies (e.g. MMBC) to ensure that all multi-family buildings that currently have municipal recycling collection would continue to receive it through StewardChoice or MMBC? Who would oversee this to ensure no buildings fall through the cracks? The Aug 26 webinar acknowledged the need to be explicit about the geographic collection area, but the plan doesn’t mention where the multi-family units in Year 1 (120,000 units) or Year 3 (350,000 units) are located. Can you specify the city or region? 	<p>Province that are not receiving producer-funded service, we are open to working with anyone that chooses StewardChoice as a service provider. Thank you for pointing out that we are have not be clear enough on our intentions to be open to work with any local governments in our plan – we will amend the Plan to make this more clear.</p> <p>Most local governments have already entered into contractual agreements for PPP service to its residents. The terms and conditions of these agreements will determine the timing and steps for local governments and StewardChoice to enter discussions on establishing agreements. As the variables are different in each circumstance we expect that each discussion will be unique.</p> <p>If the City of Vancouver has a preferred process for establishing an agreement, StewardChoice is open to entertaining this.</p> <p><u>Section 1.1 as amended</u></p> <p>Multi-family Buildings</p> <p>StewardChoice has no restrictions with whom it may contract. StewardChoice will ask the municipality or building owner to consider StewardChoice and its partners as its service provider.</p> <p>In <u>Section 4</u> of the Plan StewardChoice has committed to cooperate with other stewardship agencies and has proposed a set of level playing field principles. StewardChoice believes that the competitive nature of the open market will provide the incentive to service as many buildings as possible and collect as many tonnes as possible. In <u>Section 4</u>, StewardChoice has committed to a 75% Recovery Rate or another rate set by the Director that applies to all programs. Therefore, the more</p>	

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Sector	Question/Comments	Response with Reference to the Area in our Plan Where this Question is also Covered	Amendment Required to Draft Plan
	<p>Funding</p> <ul style="list-style-type: none"> • What are StewardChoice’s guiding principles with respect to funding? In determining funding levels, what consideration is given to the Recycling Regulation which states the plan must adequately provide for “free consumer access to recycling facilities”? • How would funding levels be determined for a) private companies and b) local governments? • Does StewardChoice intend to offer the same fixed rates to all collectors, or would this be negotiated on a case-by-case basis? <p>Materials</p> <ul style="list-style-type: none"> • The plan indicates that acceptable materials will be “determined by the [collector] and StewardChoice.” How exactly would the list be determined, and which party would have final say? • Would collectors be required to collect some or all of the materials in the list posted on StewardChoice’s website: http://stewardchoice.ca/wp-content/uploads/2014/08/Draft-PPP-Definition-Producer-Reporting.pdf ? 	<p>tonnes that an agency collects, the more producers they will able to service and meet the recovery target. Our initial focus is to fill the gaps that are currently not receiving service. These municipalities and the location of these multifamily buildings are known and form the basis for our year 1 target.</p> <p>We will make public the municipalities in which multifamily building owners have chosen StewardChoice after formal agreements have been completed. Our year 3 target provides a sense of our intended growth targets, however, achieving this target is dependent on municipalities and building owners choosing StewardChoice as their partner or service provider.</p> <p>Funding</p> <p>StewardChoice is of the view that the open market model will provide the best value and service to British Columbians. StewardChoice intends to comply with the Regulation, including the provisions for consumer access. Payments for service will be negotiated with anyone who chooses StewardChoice. Payments for service will be negotiated individually. <u>Sections: 1.2, 1.3,1.4</u></p> <p>Materials</p> <p>That list posted on our website is the list for which producers are required to report their sales. It does not constitute the list of materials that will be accepted for recycling. Collectors will be required to collect a subset of this broader list. <u>Section 3.7 as amended</u></p>	<p>Yes. See amended Section 3.7</p>

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Sector	Question/Comments	Response with Reference to the Area in our Plan Where this Question is also Covered	Amendment Required to Draft Plan
	<ul style="list-style-type: none"> Will the StewardChoice program only collect material produced by StewardChoice’s licensed producers? The webinar mentioned the need for a protocol between PPP stewardship agencies to prevent duplication of reporting. From a practical perspective, what would this protocol entail? How would it be applied on the ground, and how would it effect collectors’ operations and reports? 	<p>No. Similar to the methodology developed by the existing PPP stewardship agency in British Columbia, StewardChoice proposes to collect and recycle 75% of the equivalent PPP sold into British Columbia by their subscribed producers. <u>Section: 5.1</u> StewardChoice will be transparent about which producers are subscribed to our program. This will ensure that there is no double reporting. There should be no impact as a result of multiple compliance agencies on collectors. <u>Sections: 1.3, 3.1,4</u></p>	
	<p>Operations/Logistics</p> <ul style="list-style-type: none"> Will StewardChoice impose any requirements on whether specific material streams must be commingled or segregated? What are StewardChoice’s service level commitments and requirements? Who would be responsible, physically and financially, for conducting the collector composition audits? During the webinar, did StewardChoice mention that collectors would be required to do third party audits to verify the end-destination of marketed materials? If so, please provide more detail on what this would entail, and who would be physically and financially responsible for this. 	<p>Operations/Logistics</p> <p>No. There is already a well-functioning collection system for PPP that does not need to be disrupted. StewardChoice will leave the decision of how to collect the PPP (e.g. single or multi-stream) up to the contracted collector. Similar to the other PPP stewardship agency, StewardChoice commits to servicing the multi-family buildings and other household areas that are contracted through StewardChoice collectors. StewardChoice along with the contracted collector will be responsible for developing the methodology and process for conducting the collector composition audits. Yes, StewardChoice did mention the need to conduct a third party reasonable assurance requirement during the webinar consultations. In the declarations from contracted collectors; StewardChoice will require verification on the end-fate of marketed materials in accordance with the requirements set out in the Regulation. Ultimately these costs will be included in the rates negotiated with the RSC. <u>Section 3.6</u></p>	No

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Sector	Question/Comments	Response with Reference to the Area in our Plan Where this Question is also Covered	Amendment Required to Draft Plan
	<ul style="list-style-type: none"> What are StewardChoice's requirements regarding industrial/commercial/institutional (ICI) materials? <p>Communications/Customer Service</p> <ul style="list-style-type: none"> Under the StewardChoice plan, who is responsible for communications and public education? What communications/education tools or funding would StewardChoice offer to collectors? Who would be responsible for responding to customer inquiries/complaints? What are StewardChoice's commitments and requirements in this regard? <p>Reporting</p> <ul style="list-style-type: none"> What specifically would StewardChoice's reporting requirements be for collectors in terms of tonnages, customer service, etc.? Please provide any details on reporting frequency, along with any operational procedures (e.g. weighing) or documentation that may be required to support this. 	<p>StewardChoice has no requirements regarding industrial/commercial/institutional materials. This is a decision that can only be made by the BC provincial government. Today, our StewardChoice Stewardship Services Plan is designed to comply with the existing Regulation which does not currently regulate PPP in the IC&I sector. <u>Section: 2.1</u></p> <p>Communications/Customer Service <u>Section 1.4</u> of the Plan outlines how we intend to work with RSC. It is our opinion that the RSC knows the resident best and is best placed to manage the consumer interface. <u>Section 1.4</u> of Plan outlines how we intend to work with RSC's. The RSC will be responsible to deal with customer inquiries or complaints. It is our opinion that the RSC knows the resident best and is best placed to manage the consumer interface and StewardChoice will ensure in its contracts with RSC that the RSC provides this as part of its service.</p> <p>Reporting <u>Section 1.4</u> of the Plan outlines how we intend to work alongside RSC's. Our intention is design a system that is efficient, is built off the current system and does not add complexity without value. We expect our reporting requirements to be monthly, include tonnage totals and where the tonnage originated, and include declarations indicating that the material has been recycled. It will be focused on what is required to meet the reporting requirements in the Regulation and negotiated as part as the agreement with each RSC.</p>	<p>No</p> <p>No</p> <p>No</p>

Attachment B – Submissions and Responses Submitted by September 12, 2014			
Sector	Question/Comments	Response with Reference to the Area in our Plan Where this Question is also Covered	Amendment Required to Draft Plan
	<p>Targets</p> <ul style="list-style-type: none"> Does the recovery rate formula include all PPP, including PPP generated by producers who aren't members of StewardChoice, as in: <p style="padding-left: 40px;">Recovery rate = $\frac{\text{Amount of Product Collected under contract with StewardChoice (including PPP generated by producers who aren't StewardChoice members?)}}{\text{Amount of Product Generated by licensed StewardChoice producers}}$</p> <ul style="list-style-type: none"> If so how would such a recovery rate work in practice and what might be some operational implications of this? What targets will StewardChoice adopt for: <ul style="list-style-type: none"> Reducing packaging & printed paper (e.g. for specific types of PPP) Recycling rate (the % of recovered material that is actually recycled) Access (e.g. # of single-family and multi-family households receiving collection) Consumer/resident awareness of the program 	<p>Targets</p> <p>The Regulation defines how to calculate recovery rates. We intend to report the PPP sold by Producers that have chosen StewardChoice and the amount of PPP collected by our contracted recycling services providers. Importantly, StewardChoice has committed in Section 4 of the Plan to a recovery rate of 75% or another rate set by the Director that applies to all producers and programs.</p> <p>As mentioned above, the Recycling Regulation provides a market incentive for producers to put less PPP on the marketplace. Estimating exactly how the market will respond to this incentive has many variables and is difficult to determine. StewardChoice has committed to report how many tonnes of PPP are generated. Once material is collected, there is a market based incentive to recycle as much as possible. Ideally 100% of collected material will be recycled. StewardChoice intends to provide independently verified reports that outline how the collected product was managed (e.g. recycled). Section 3.3 of the Plan outlines our targets for the initial number of multifamily units. Our position is that the market will decide how many municipalities and multi-family building owners will choose StewardChoice in Year 3 and beyond. In an open market model with choices, there is a market incentive to make residents aware of how to access recycling services in order to collect more tonnes and service more producers.</p>	No

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Sector	Question/Comments	Response with Reference to the Area in our Plan Where this Question is also Covered	Amendment Required to Draft Plan
	<p>Consultation</p> <ul style="list-style-type: none"> The consultation period seems inadequate given that it took place over the summer, and that new information emerged in the webinar that wasn't included in the plan. We feel it's important for stakeholders to see how the plan has evolved. Could StewardChoice adjust its schedule to give stakeholders the opportunity to provide feedback on the next version(s) of the plan? 	<p>Consultation</p> <p>As the effective date of the Regulation has passed, StewardChoice is responding to the needs of producers that are not compliant with the regulation and need to come into compliance in a timely manner to avoid penalty. We also believe we are responding to the needs of communities and residents of BC that are currently not receiving producer funded service, and who deserve this service. We also believe that we have followed the Ministry's guidance on consultation, with consideration to the non-compliance issues and current service gaps mentioned above.</p> <p>Given the initial focus of our Plan on gaps in the current service, we have not had any difficulty engaging the affected stakeholders over the summer.</p> <p>Almost all of the questions from the first webinar were related to the operational details of the program and the potential business to business relationships, which are not required to be outlined in the Plan. For the webinar questions that were specific to the Plan and Regulation, we intend to make a small number of "clarity" amendments to plan to respond to these specific and appropriate suggestions. However, as the feedback to date shows that there is broad support for our model and approach, we do not anticipate major changes.</p> <p>We feel that the sooner we are able to negotiate those business to business relationships the better it will be for everyone. As such, we do not intend to extend the consultation period but will commit to engaging with City of Vancouver and any other entity that wishes to begin negotiations on service provisions.</p>	No

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Retailer: Blind Bay Village Grocer	Reporting and collection of fees should be at the distribution level or manufacturing level not passed on to the last retailer. As for small business one store the time and effort to report is daunting and time consuming. Also it would be nice to get a clear concise direction on the plan and fees not an open ended one sided agreement that gives all power and control to MMBC with no commitment or obligation to the stewards to be efficient and transparent. My experience with MMBC so far is they are grabbing fees and control and want open ended agreements signed with accountability on their part. They always talk fines and compliance but what are their penalties for mismanagement and poor allocation of funds.	StewardChoice will tailor its contract with each producer to reduce complexity and minimize administrative burdens particularly for small and medium size enterprises. To differentiate itself in the market, StewardChoice will have to be efficient and offer more value to producers. <u>Section 1.3</u>	No
Shaw Sue Maxwell	<p>Steward Choice Program Plan for PPP in BC</p> <p>There are three benefits to this plan. One key benefit is the attention it brings to the dearth of meaningful action by MMBC to provide quality recycling to multi-family buildings. The second is the possibility of hauling and recycling companies left out of the MMBC program to have continued work in the residential sector and thus preserve competition in these areas. The third is the offer of in suite bins.</p> <p>However, these benefits do not outweigh the significant deficits of the proposed program.</p> <ol style="list-style-type: none"> 1. Programs should take care when using the term “market-based” as if a solely market-based approach were effective and all of the costs were already paid by the producers, there would be no need for a program. The very poor recycling rates we currently have for multifamily buildings show that there is a strong need for an effective program. 2. Stewards should be able to choose how they discharge their obligations under the regulation but only if the quality of each program is similar. As the most expensive part of these PPP programs will be the collection, leaving the more expensive curbside collection (and in the future, more streetscape collection) to another program while focusing solely on multi-family buildings could create a cost difference between the programs that would allow a producer that is less interested in a quality program and only wishing to keep costs low, to choose the cheaper program. If the Ministry allows this, this will create a race to the bottom for the minimum level of services from programs that would be accepted. In addition, stewards need to discharge their entire obligation, not only the portion that is multi-family dwellings as it is unlikely that their products flow only to those buildings. As such, a producer should pay both for the Steward Choice program and the MMBC program and this distinction in terms of what amount of material flows where should be determined by a 100% industry-funded study that is overseen by the Ministry of Environment staff (and the results made public). To allow otherwise would undermine both the intent of the Recycling Regulation and the existing program. 3. Lack of action on reducing, redesigning or reusing packaging. These first three Rs spelled out in the 	<p>We agree there is a need for effective multi-family recycling programs. StewardChoice recognizes that 20% of multi-family dwellings are not being served by the other PPP agency and this is an opportunity to implement an effective recycling program within this community to address the need for increased recycling in multi-family buildings. StewardChoice is also exploring the prospect of providing service to other singly family communities that are not receiving producer-funded recycling service.</p> <p>We agree that producers should have choice and that is the premise of StewardChoice. We are able to offer a level of service that will give producers the flexibility to tailor their compliance programs. For example we will continue to collect materials that are currently being collected (e.g. glass containers). Similar to the methodology developed by the existing PPP stewardship agency in British Columbia, StewardChoice proposes to collect and recycle 75% of the equivalent PPP sold into British Columbia by their subscribed producers. We believe all PPP recycling agencies need to be held to this standard. <u>Section: 5.1</u></p>	<p>Yes, see Amended Section 1.1.</p> <p>No</p>

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	<p>regulation have been omitted from the plan. Packaging is an area where there are many great examples of individual; producers already taking meaningful action on these issues (such as Avalon milk’s reusable bottles with deposits or MEC avoiding plastic bags). The program should lay out clear steps on how it will encourage more of these actions (producer education, publicizing how to opt out of directories and unaddressed ad mail, how fees are determined, educating the public on what choices are better, etc.). To merely report on the reduced environmental impacts with no clear actions on how to produce them is not adequate.</p> <p>4. Lack of clarity on how the materials will be handled. By allowing the recyclers to determine where materials flow means that in times of lower market prices, materials could still end up being burned and landfilled. The intent of the program should be to ensure that neither of these practices occur. MMBC has set a minimum standard by committing to not burning any of the residual materials. By not being clear on this, Steward Choice could undermine the progress made by MMBC. In addition, this may make it harder for Steward Choice to provide accurate reports on the amount collected and where it went.</p> <p>5. Governance –a program run by a for profit company offers more risks than those run by non-profits. Many programs are essentially monopolies but when run as non-profits, there is a natural check on the fees that they charge (often passed directly to consumers). This program would be strengthened by setting up an arm’s length non-profit association to handle the program and to ensure the inclusion of non-industry key stakeholders on the Board (local governments, environmental groups, citizens groups, etc.).</p> <p>6. Choice of materials collected and education. If a different suite of materials are collected other than the same set as MMBC, this will result in more confusion than currently exists. The benefit of having only one program is that there can be a move to clear province-wide communications allowing residents to collect the same materials regardless of where they go. This would be negated with the Steward Choice method and indeed, could be very complicated for local governments to educate their residents. These materials should match MMBC or at the very least be stated in the plan to ensure that the program is not high-grading the more valuable materials in order to produce a cheaper program.</p> <p>7. Lack of targets. The plan quotes the regulations target of 75% collection but has no interim targets, intention to go beyond that nor material specific targets. Measurement will prove difficult as it is likely that the material collected will be from both Steward Choice producers and MMBC producers so it will be very hard to determine the numerator of the calculation.</p>	<p><u>Section 5.3</u> of our Plan outlines how StewardChoice will reduce PPP through system design and supply chain optimization.</p> <p>The Regulation requires producers to pay for the costs of collecting and managing the PPP that they put on the marketplace. StewardChoice will collect packaging and pass the costs onto producers. Producers that put less PPP on the market or choose materials that are more recyclable will lower their compliance costs.</p> <p>StewardChoice has adopted the principle of “no going back” hence, multi-family buildings that are currently being served by a private recycling services company, will not have any changes made to their list of acceptable packing and printed paper. We may add materials but we will not remove any materials already being collected. In addition, StewardChoice will follow the pollution prevention hierarchy described in the British Columbia Recycling Regulation and will be submitting to government on an annual basis a third-party findings report that provides reasonable assurance that StewardChoice and its recycling partners followed the pollution prevention hierarchy.</p> <p>In fact competition is an integral part of Canada’s economic system and permeates businesses across the country. All of the producers are involved in competition and the result is lower costs to consumers. Monopolies have been shown time and again to only act in their own best interest.</p>	<p>No</p> <p>No</p> <p>No</p> <p>No</p>

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		<p>Communications are clearly important for all stakeholders. As an example StewardChoice is committed to continuing the inclusion of materials that are currently collected in a given system, i.e. if glass is currently collected it will continue to be collected. We have heard from municipalities and multi-family building owners that maintaining the collection of the same materials reduces confusion.</p> <p>StewardChoice believes that all PPP agencies should be held to the same standards. The standard set out by the British Columbia Recycling Regulation and Schedule 5 is to achieve a 75% recovery rate and StewardChoice is committed to achieving this.</p>	<p>No</p> <p>No</p>
Tri-municipality North Shore Recycling Program	<p>We understand that the City of Vancouver has submitted comments to you and we would like to echo their questions and concerns (summarized below and with their permission). Your plan and your overall approach is interesting, but we feel that it would require much more detail for it to be a viable 'choice'.</p> <p>Below please find North Shore Recycling Program's list of questions, comments and concerns. Note that, as a tri-municipal department, we're submitting comments on behalf of the City of North Vancouver, District of West Vancouver and District of North Vancouver:</p> <p>Design</p> <ul style="list-style-type: none"> You appear to be very focused on providing a competitive price to producers. Given that the financial incentive is often the driver for producers to create better designed products that can be disposed of responsibly, how will the StewardChoice plan encourage producers to reduce PPP, or design packaging to be reused or recycled? How would StewardChoice reward producers for these investments? How will StewardChoice make producers responsible for non-recyclable PPP or PPP with low market value, given that StewardChoice producers will not bear the risk of fluctuating recycling markets? What R&D initiatives will StewardChoice undertake to expand recycling markets for hard-to-recycle materials? 	<p>Given these questions are similar to the questions submitted by the City of Vancouver, please see the response to the City of Vancouver on pages 12-19.</p>	

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	<p>Relationship with local governments</p> <ul style="list-style-type: none"> Does StewardChoice intend to engage local governments as collectors? If so would it be for single-family curbside, multi-family, and/or depots? At what stage? Local governments are referred to in the plan but the nature and timing of the relationship is unclear. If StewardChoice does intend to engage local governments, what process do you envision for negotiating and establishing agreements? <p>Multi-family buildings</p> <ul style="list-style-type: none"> Where multi-family buildings are on the “open market” (without municipal collection), how would StewardChoice work with other PPP stewardship agencies (e.g. MMBC) to ensure that all multi-family buildings that currently have municipal recycling collection would continue to receive it through StewardChoice or MMBC? Who would oversee this to ensure no buildings fall through the cracks? <p>Funding</p> <ul style="list-style-type: none"> What are StewardChoice’s guiding principles with respect to funding? In determining funding levels, what consideration is given to the Recycling Regulation which states the plan must adequately provide for “free consumer access to recycling facilities”? <p>Materials</p> <ul style="list-style-type: none"> The plan indicates that acceptable materials will be “determined by the [collector] and StewardChoice.” How exactly would the list be determined, and which party would have final say? Would collectors be required to collect some or all of the materials in the list posted on StewardChoice’s website: http://stewardchoice.ca/wp-content/uploads/2014/08/Draft-PPP-Definition-Producer-Reporting.pdf ? <p>Operations/Logistics</p> <ul style="list-style-type: none"> Will StewardChoice impose any requirements on whether specific material streams must be commingled or segregated? What are StewardChoice’s service level commitments and requirements? Who would be responsible, physically and financially, for conducting the collector composition audits? During the webinar, did StewardChoice mention that collectors would be required to do third party audits to verify the end-destination of marketed materials? If so, please provide more detail on what this would entail, and who would be physically and financially responsible for this. What are StewardChoice’s requirements regarding industrial/commercial/institutional (ICI) materials? <p>Communications/Customer Service</p> <ul style="list-style-type: none"> Under the StewardChoice plan, who is responsible for communications and public education? What communications/education tools or funding would StewardChoice offer to collectors? 		

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	<ul style="list-style-type: none"> Who would be responsible for responding to customer inquiries/complaints? What are StewardChoice's commitments and requirements in this regard? <p>Reporting</p> <ul style="list-style-type: none"> What specifically would StewardChoice's reporting requirements be for collectors in terms of tonnages, customer service, etc.? Please provide any details on reporting frequency, along with any operational procedures (e.g. weighing) or documentation that may be required to support this. <p>Targets</p> <ul style="list-style-type: none"> Does the recovery rate formula include all PPP, including PPP generated by producers who aren't members of StewardChoice, as in: Recovery rate = $\frac{\text{Amount of Product Collected under contract with StewardChoice (including PPP generated by producers who aren't StewardChoice members?)}}{\text{Amount of Product Generated by licensed StewardChoice producers}}$ If so how would such a recovery rate work in practice and what might be some operational implications of this? What targets will StewardChoice adopt for: <ul style="list-style-type: none"> Reducing packaging & printed paper (e.g. for specific types of PPP) Recycling rate (the % of recovered material that is actually recycled) Access (e.g. # of single-family and multi-family households receiving collection) Consumer/resident awareness of the program <p>Consultation</p> <ul style="list-style-type: none"> The consultation period seems inadequate given that it took place over the summer, and that new information emerged in the webinar that wasn't included in the plan. We feel it's important for stakeholders to see how the plan has evolved. Would StewardChoice consider adjusting its schedule to give stakeholders the opportunity to provide feedback on the next version(s) of the plan? 		
Metro Vancouver Regional District	In general the draft plan lacks detail with respect to how the program is intended to be implemented. For example, the plan is not clear that the program is based on a source separated model rather than on attempting to recover recyclables from garbage. StewardChoice representatives have advised that the model will be a source separated recyclables model, and further reinforced this statement in a recent consultation event, but the plan needs to explicitly state this.	StewardChoice has made the commitment to maintain the integrity of separated material at the point of collection so once separated, it will not be mixed with waste later. Section 3.1 as amended	Yes. See amended section 3.1

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	<p>Metro Vancouver and member municipal specific comments include the following:</p> <ul style="list-style-type: none"> • The Plan must clarify whether the scope of collection activities includes residential premises and ‘streetscapes’ as defined in the Recycling Regulation, or whether the scope is limited only to multi-family households not already receiving producer-funded or municipally provided PPP collection. • If the scope is limited to multi-family households only, the Plan needs to describe how the program will contribute to supporting recycling of PPP in these more challenging and higher cost environments, particularly streetscape and rural recycling systems. 	<p>We have received a significant amount of positive feedback from local governments that would like to have choices in the PPP producer agencies that they work with. While our initial focus is to fill the gaps in the Province that are not receiving producer-funded service, we are open to working with anyone that chooses StewardChoice as a service provider. Thank you for pointing out that we have not be clear enough on our intentions to work with any local governments in our plan – we will amend the Plan to make this more clear. Most local governments have already entered into contractual agreements for PPP service to its residents. The terms and conditions of these agreements will determine the timing and steps for local governments and StewardChoice to enter discussions on establishing agreements.</p> <p><u>Section 1.1 as amended</u></p> <p>We believe that having choice available to local government, producers and recycling service companies will ensure a stable recycling system in BC. We agree that collaboration in essential.</p> <p><u>Section: 4</u></p>	Yes. See amended section 1.1
	<ul style="list-style-type: none"> • If there is more than one approved plan, there is a need to ensure an overall, stable recycling systems, whether the programs achieve this collaboratively or if it is determined by Ministry of Environment. 	<p>We will encourage producers to reduce the amount of packaging and printed paper they place on the market in BC. They have a direct incentive to do so. Producers that reduce the amount of material used in their packaging design can lower their compliance costs.</p> <p><u>Section: 4</u></p>	No
	<ul style="list-style-type: none"> • The Plan does not provide sufficient detail on how the program will work to encourage producers to address the design of its products and packaging to avoid the creation of waste in the first place. 	<p>Contract details between building managers and or strata council will be negotiated with their Recycling Services Company.</p> <p><u>Section: 1.4</u></p>	No
	<ul style="list-style-type: none"> • The Plan lacks sufficient detail related to collection options, program oversight, transparency of collector payment or incentive, and reporting requirements. 		No

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	<ul style="list-style-type: none"> If a ‘free-market’ collection system is adopted, building managers and/or strata councils should not have extra fees to participate in the program. In this sense, recycling should be ‘free’ to residents. If there is more than one approved plan, performance measures must be reviewed and updated and recovery target reporting must be transparent. Trying to reconcile performance measures according to ‘producer allocations’ will become confusing for stakeholders. 	<p>Our plan sets out how we will report results. Producer allocations should not be required. <u>Section: 3.7</u></p>	No
	<ul style="list-style-type: none"> Due to the evolutionary construction of multi-family buildings over the decades, some have adequate collection space and ease of access, and other buildings do not. A mechanism must be developed, collaboratively among the programs or determined by the Ministry of Environment, to ensure that each building has the opportunity to participate in a producer funded program. Allowing any one organization to ‘cherry-pick’ collection sites will negatively impact the other stakeholders. 	<p>Recycling Services Companies regularly compete for new customers and offer services and prices based upon the requirements of the building and its owner/manager. Collectors under contract with StewardChoice will operate in this fashion as well. <u>Section: 1.4</u></p>	No
	<ul style="list-style-type: none"> Consistent standards for service levels (e.g., a consistent suite of materials collected and specified number of pick-ups) and service coverage are required. StewardChoice representatives have communicated that StewardChoice intends to mirror the collection of materials that have been defined by MMBC. The suite of materials collected and the process for collecting these materials must be detailed in the Plan. 	<p>The list posted on our website: http://stewardchoice.ca/wp-content/uploads/2014/08/Draft-PPP-Definition-Producer-Reporting.pdf This is the list for which producers are required to report their sales. It does not constitute the list of materials that will be accepted for recycling. Collectors will be required to collect a subset of this broader list. However, this list of eligible materials will be similar to the other PPP program. <u>Section: 3.1 as amended</u></p>	Yes. See amended section 3.1
	<ul style="list-style-type: none"> The Plan refers to “self-compliance” multiple times in the Plan. The Plan does not adequately address how self-compliance will be defined, verified and reported to the Ministry of Environment. 	<p>Once StewardChoice has negotiated contracts with producers who are capable of some degree of “self-compliance,” we will establish a reporting protocol with the Ministry of Environment.</p>	No

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Retail Council of Canada	On the question of its governance structure, StewardChoice has indicated that the "Board will consist of people representing the owners of StewardChoice as well as other B.C.-based individuals. Because StewardChoice is a private business it does not need to represent the different stakeholder groups." RCC expresses deep concern about ceding control of the organization to collectors and processors, which does not follow established EPR principles upon which all Canadian jurisdictions have agreed. A true EPR structure would see the contributing stewards determine the direction of the program's operations and management.	StewardChoice Enterprises Inc. is a subsidiary of Reclay StewardEdge. Reclay StewardEdge is a professional management consulting and services company; the company is not a waste collector or processor. Therefore no control has been "ceded" to collectors and processors. <u>Section 3.7</u>	No
	The intent of the EPR and B.C.'s Recycling Regulation is to shift the cost from taxpayers to producers. StewardChoice has said that "the recycling services provider will have the flexibility to negotiate any services with multi-family buildings on a competitive basis." In practice, there is no guarantee that funding will be passed onto property managers to allow cost reductions of their collection contracts. If StewardChoice does not have any influence on the collection costs agreed on with property managers, then we are only looking at a system funding the recycling services companies. We believe that this venture will only add profits to collection/recycling services companies while a plan under the producers' control aims for cost effective services to the benefit of all stakeholders - stewards, municipalities and consumers alike.	Recycling service companies contracted to StewardChoice and operating within the "open market" naturally compete for their customer (e.g. multi-family buildings) and to remain competitive, they will offer fair market value to property managers or they risk losing customers. <u>Section 2.2</u>	No
	There must be a level playing-field on compliance costs. StewardChoice says "the cost of compliance will be negotiated directly with each producer." Most stewards with less resources (time or staff) will not have the capacity to enter into individual producer-based discussions with StewardChoice to compare their costs with Multi-Material B.C. The cost of compliance per tonne marketed could be different depending upon the volume -there is no assurance provided that this system will not only benefit the largest producers.	Producers will choose whether to subscribe to one plan or the other. Part of that evaluation will be the level of customer service offered by each plan. <u>Section 1.3</u>	No
	There must be equal treatment for all stewards regardless of the organization they have chosen to fulfill their obligations under the Recycling Regulation. Any competing plan must be held to the same requirements that Government has placed upon Multi-Material B.C. If a plan is submitted by StewardChoice, the Ministry of the Environment should allow stewards under the existing PPP program to submit a new plan under the same requirements.	We have set out our view of the principles for a level playing field. <u>Section 4 as amended</u>	Yes. See amended section 4
	Finally, it is important to ensure all stewards have access to the required information for reporting and therefore important that the list of stewards be transparent in order for a steward to determine who is paying for each particular product.	We agree. <u>Section 4</u>	No

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