

Transitioning to Full Product Stewardship:

A co-operative strategy

Background

During the Canadian Waste and Recycling Expo of November 2007, an informal luncheon meeting of six individuals representing both stewardship and local government viewpoints was planned to discuss how EPR can move forward at the local government level. The meeting was arranged by Laurie Gallant (Footprint) and Darcy Mooney (CSRD), and joining them were Ron Driedger (BC Used Oil), Mannie Cheung and Mark Krushner, (ProductCare) and Mark Rowlands (CH2MHill).

Mark Rowlands, Laurie Gallant and Darcy Mooney are currently collaborating on a comprehensive review and amendment of the CSRD Regional Solid Waste Management Plan. Laurie is also working with Roger Tooms of Kitimat-Stikine Regional District on new zero waste programs including a review of how EPR programs are performing. Several key EPR issues have surfaced as these two particular projects have advanced, and it was determined that these key issues are also important to all Regional Districts and to the BC Product Stewardship Council in general.

These five key issues rally around the synergies achievable through a conscious dovetailing of Product Stewardship Plans with Regional Solid Waste Management Plans and were expressed as follows:

1. Evaluation of EPR programs
2. Enhancing consumer awareness and public education regarding EPR programs and principles under a shared financial and in-kind partnership during this transition phase to 100% EPR (see note p.1)
3. Improving consumer access to collection facilities
4. Creating and enhancing local end markets for products
5. Generating robust MSW data to support tracking of progress towards waste reduction and diversion targets.
6. Specific measures local government can take to support 100% EPR (see note p.1)

Note: Need a definition of 100% EPR (see note p.1) (see note p.1) and need to recognize that 100% EPR (see note p.1) (see note p.1) may not be feasible or too risky for some products in some regions. There may be a spectrum of responsibility for each region in order to make things cost effective, especially in remote areas. More remote locations are currently subsidized by more heavily populated

regions for some products.

During the discussion of these six issues, the draft Local Government Principles for Transition to EPR was circulated. This document was drafted by Raymond Gaudart in October 2006 for the BC Product Stewardship Council and can be downloaded from their website. As a result of addressing the six issues and reviewing this draft document, the lunchtable agreed that an additional discussion paper that emphasizes a co-operative approach should be drafted and circulated. Laurie Gallant volunteered to take on the task of the first draft, and it was agreed that once the lunch table group, Neil Hastie (Encorp), and Mike Hennessy (BC Tire Stewardship) had agreed to content, the BC PSC would be invited to review with the ultimate goal of presenting a new framework for proceeding at the next RCBC conference (May 2008).

Dovetailing of Product Stewardship Plans and SWMPs

Product Stewardship or Extended Producer Responsibility (EPR), is defined as "a management system based on industry and consumers taking life-cycle responsibility for the products they produce and use".

The Ministry's Product Stewardship policy is that producers and consumers assume the cost of industry product stewardship programs not general taxpayers or local government.

At present, nine categories of products are covered by the BC Recycling Regulation and have associated product stewardship plans and associations. These categories are:

- Beverage Containers
- Lubrication Oil
- Oil Filters
- Oil Containers
- Pharmaceutical Products
- Paint
- Solvents and Flammable Liquids
- Pesticides
- Gasoline
- Tires
- Electronics
- Lead Acid Batteries

The BC Ministry of Environment has committed to introducing two new products every three years, over and above expansion on the above nine categories. Products identified as "next in line" by the Ministry include:

- antifreeze and hydraulic fluid (has been in since 2003 as part of Used Oil category)
- household batteries (alkaline, lithium, lead acid etc)
- mercury containing products (light bulbs, switches, thermometers, thermostats, medical equipment etc.)
- packaging (paper, plastic, metal, glass)
- white goods (fridge, stove, cfc containing appliances etc)
- pool and photographic chemicals

- furniture and textiles
- construction and demolition waste
- automobiles

A new regulation confirming the next two products and expansion of existing product categories is proposed for spring 2008, with the programs likely to roll out in 2009. Based on these timelines, all nine new categories will have product stewardship programs by the end of 2020, if we allow a two year roll out period for each new or expanded category.

We can now define the transition period as covering the years between the introduction of the BC Recycling Regulation in 2004 to 2020, a 16 year duration. Each product category also has its own transition period (two to five years) and as more products are added to the EPR list, the benefits and opportunities for synergies also increases. It should be noted that while the 2020 date may not include 100% of all products on the market, a sufficient percentage of them will be covered to make EPR the new norm. By that time, enough experience, enough public awareness and enough worthy models of EPR programs will exist to ensure a smoother process for adding on remaining products. **More dialogue needed on dates.**

Using these timelines, product stewardship plans can begin to plan for increased synergies during their annual reviews, and Solid Waste Management Plans, which are theoretically reviewed every five years can do the same. In particular, Regional Districts must pay attention to the lifespan of landfills and collection contracts as they relate to the transition period. A review every three years for Regional Districts on the impact of the BC Recycling Regulation seems wise.

At present, and confirmed by research conducted by Footprint in November 2006, transition strategies do not exist at the local government level. Instead, there is a discussion paper as referred to above, and an opportunity to develop transition strategies during major SWMP reviews (“every five years”). For some Regional Districts, there are also annual SWMP reviews that consist mainly of completing MSW tracking report forms provided by MOE and qualitative assessments done by staff, with or without input from a public advisory committee.

Evaluation of EPR programs

During the luncheon and based on investigations of outreach activities with Regional Districts, it was identified that a framework for evaluation of the performance of each product stewardship plan from a local government perspective does not current exist.

An evaluation is underway by MOE, and input from local governments has been requested, and through the quarterly conference calls of the BC PSC, feedback is also provided. However, there is no systematic way of collecting information that would facilitate the development of an action plan to correct shortcomings or identify partnerships for making greater progress towards the 2020 goal of an effective and efficient system of solid waste management based on 100% EPR (see note p.1) for all products.

To resolve this issue, Footprint has been developing an evaluation matrix for EPR programs in the context of SWMP implementation for the Regional District of Kitimat-Stikine. Our approach is to test and refine the matrix in RDKS and then present it to product stewards and regional districts via BC

PSC. Based on feedback received during the luncheon and new insights gained from the CWRE session on EPR trends, the draft evaluation matrix is being polished and should be available for review in January 2008.

Consumer awareness and public education

Partnerships between Product Stewards and Regional Districts or designated local authorities to enhance consumer awareness and education exist casually in some parts of the province. The satisfaction of these arrangements varies as does the level of consumer awareness. To facilitate a co-operative approach, the following quick, easy steps were identified and a target date of April 30, 2008 is proposed.

1. Each product steward to prepare a catalogue with samples listing of outreach materials currently available – this will be compiled into kits and distributed to each RD.
2. Each local authority to prepare a catalogue of community outreach opportunities (i.e. Frequency and type of communications, timing and description of events) – these will be compiled and distributed to each Product Steward.
3. All Product Stewards to explore opportunities to jointly deliver “ambassador programs” or other appropriate mechanisms based on the Used Oil Recycling Association's model and amendments to this model that may result from further discussions, and to jointly deliver other education and awareness programs. All vehicle related products for example could come under one program. A separate program for pharmaceuticals is most likely.
4. All local authorities to erect signs at disposal and recycling facilities including one day events clearly indicating products that can be recycled and where (even if locations are off-site) Note: BCUOMA has artwork for signs
5. Using the example of the BCUOMA newsletter to local governments, explore opportunity for one newsletter with updates from all stewards and MOE on recent and planned changes to existing system and available resources.
6. All stewards to review, upgrade and updating EPR information on RCBC website as needed to make the RCBC site the one stop information shop; RCBC site and hotline to be promoted by stewards and local government
7. All local governments and authorities to ensure that Hotline operators have up to date information on community recycling opportunities outside of EPR programs

Local end market development and collection systems

Prioritizing innovative solutions to increase efficiencies must be a guiding principle for product stewardship plans and SWMPs. This principle applies equally to populated areas as well as remote locations. An examination of incentives for local solutions that reduce transportation requirements will be necessary. Examples of initiatives that support or would support this principle include:

- Provision of collection tank for used oil tank in Atlin – at BCUOMA's expense
- Endorsement of creative local solutions i.e. latex paint as a cement additive and valid diversion i.e. eligible for incentive payments (this is already in place for ProductCare but most products don't have value)
- Cost-sharing of glass crusher

- Research into risks and benefits of used oil as furnace fuel i.e. for greenhouses in remote locations and in service shops (bans are in place for furnace application in many jurisdictions); BCUOMA is not a proponent of this application
- EPR depots at transfer stations and landfills; for some regions this will be a temporary solution for others this may be a permanent and a preferred solution

MSW and Eco-fee Tracking

Evaluation of program efficiencies and progress towards waste reduction targets is currently done through product stewardship annual reports, MSW tracking reports, and to some degree waste characterization studies.

Co-operation between stewards and Regional Districts to track material flows and facilitate transition planning is currently possible at some levels by some stewards. For example, it is not possible to track sales for all products by RD or community as this is done by brand owners, not stewardship associations. However, for some associations such as Used Oil, this tracking can be done by zone and estimated for individual Regional Districts using population statistics.

Tracking recovery of products is significantly easier since data can be provided by collection depot for most products i.e. ProductCare but not Used Oil (due to collection system being open to more than the DIY market).

Tracking of eco-fees is not considered a useful exercise given that smaller and remote communities are subsidized.

Development of a standardized and adaptable methodology for waste composition studies to identify waste by product category is considered useful for planning purposes. Jointly funded studies to generate useable data for Regional Districts is an achievable goal during the transition period. A study every five years may be a reasonable interval.

It is recommended that a reliable method for adapting data from one RD's study to another RD's waste stream also be developed. Factors such as economic activities, geography and culture, population growth, waste reduction policies and programs, and diversion opportunities generally need to be factored in before assuming percentages for one RD's product waste stream would be the same in another region of the province.

Note: ProductCare and BCUOMA have participated in waste composition studies before i.e. Capital Region District and appreciate having input into methodology so that results are useful to stewards for planning purposes.

Local Government Actions

Each Regional District can include EPR strategies in their SWMPS to help shorten the transition period and reduce costs. As a start, the following six actions can be taken:

1. Introduce bans on materials that have reasonable disposal alternatives
2. Sign up for co-operative consumer awareness and education programs

3. Implement purchasing policies that favour suppliers who provide end-of-life management for their products
4. Provide feedback on EPR program performance
5. Assist with siting of facilities
6. Designate adequate space and zoning for eco-depots (need definition)

Summary

A partial summary of the role that Senior Government, Industry, and Local Government can take to make the transition to full EPR by 2020 less painful and more efficient is presented below.

Component	Province	Industry	Local Government
Collection	Establish standards of cleanliness and service at depots in contracts with private operators.	Establish standards of cleanliness and service at depots in contracts with private operators.	<p>Zoning for depots</p> <p>Provision of temporary or permanent sites and assistance in establishing depots i.e. local government as generators of used oil and need for on-site depot i.e. Elkford</p> <p>Planning for variations in products and volumes collected under existing and future garbage and recycling services.</p> <p>Establish standards of cleanliness and service at depots in contracts with private operators.</p>
Consumer education	Develop overarching public education campaign using CBSM	<p>Develop overarching public education campaign using CBSM</p> <p>Provide catalogue of education and marketing materials available</p> <p>Work with retailers to improve front-line staff knowledge of programs.</p>	<p>Develop overarching public education campaign using CBSM</p> <p>Provide catalogue of outreach opportunities</p> <ul style="list-style-type: none"> ● Utility bill inserts ● Newsletter article ● Website

			<ul style="list-style-type: none"> Community events and venues for displays and distribution of print materials
MSW tracking	Develop methodology and fund pilot project for EPR focused waste composition study	<p>Contribute to costs of study (every 3-5 years?)</p> <p>Provide annual reports showing volumes by depot within RD boundaries.</p>	Contribute to costs of study (every 3-5 years?)
End Markets	Provide incentives for local market development	<p>Provide incentives for local market development</p> <p>Provide funding for equipment in lieu of transportation costs.</p>	Provide incentives for local market development