

Regional District of Kootenay Boundary

2005.08.30

The Honourable Barry Penner
Minister of Environment
Room 112
Parliament Buildings,
Victoria, BC V8V 1X4

RE: MANAGEMENT OF PRODUCT WASTE

Dear Minister Penner:

At their meeting of August 18, 2005, the Waste Management Committee of the Regional District of Kootenay Boundary (RDKB) discussed the status of our progress toward Zero Waste, a goal we adopted in 2000. The Committee realizes that without the implementation of Extended Producer Responsibility (EPR) programs to cover a much broader scope of products, our goal will be difficult if not impossible to reach.

While the RDKB acknowledges British Columbia's leadership in the field of EPR, it is frustrated by the Province's refusal to expand the beverage container stewardship program to include milk and milk substitute containers despite overwhelming local government and public support for doing so. This situation is however only symptomatic of the underlying problem, specifically that Regional Districts have been given responsibility for managing the discards of our consumer society without being given adequate authority to do so in a way that doesn't impact the local taxpayer. The Regional District of Kootenay Boundary with a population of less than 32,000, now spends over \$500,000 annually operating recycling programs to recover materials that should be managed by their producers.

We would be far better served if the responsibility for managing all these products were shifted to the producer. As we have seen the EPR approach encourages producers to design their products and packaging for ease of recycling and minimization or elimination of toxic components without requiring prescriptive regulation by government.

The obvious course of action is for the Province to move as quickly as possible to establish EPR programs to cover all product waste, thereby relieving local government of the need to fund expensive recycling and landfilling operations. Both the Province and local governments know what needs to be done and how to do it. The enabling legislation is in place. We in local government fail to understand the delay.

One possible approach to EPR for commodities that are being collected in curbside and depot recycling programs is simply to require industry to fund 100% of the cost of those programs and to be responsible for their operation. The province's experience with other EPR programs shows that those who produce products are best able to devise and operate systems for their collection and subsequent recycling.

A second, but admittedly far more complicated option, is for the province to authorize local government to collect fees to fund recovery of these products without resorting to the tax base. For example, local government might be authorized to impose recycling fees on all products at point of sale as Encorp does for beverage containers. This approach would provide funds for program operation that reflect our commitment to the user pay philosophy. The drawback to this approach is that it does not provide the necessary incentive to producers to minimize waste production and to internalize the cost of dealing with what cannot be eliminated.

Therefore, since the provincial government retains the authority to require the implementation of Extended Producer Responsibility programs covering all product waste, in accordance with Resolution 377-05 the Board of Directors of the Regional District of Kootenay Boundary hereby returns all responsibility for the management of product waste to the Province of British Columbia.

Yours sincerely,

Rick Hardie, Chair

cc: Katrine Conroy, MLA
Recycling Council of BC