

Memo

CRD

**TO:** Parliamentary Secretary Malcolmson  
**FROM:** Russ Smith, Senior Manager, Environmental Resource Management  
**DATE:** March 16, 2020  
**SUBJECT:** **Tour of Hartland EPR**

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Dear Parliamentary Secretary Malcolmson:

On behalf of Larisa Hutcheson (who is away from the office this week), I'd like to thank you for visiting Hartland Landfill last week and hope that you found it helpful and informative. As we discussed, the CRD supports and has a long history of working with Extended Producer Responsibility (EPR) stewards to deliver collection services for end-of-life stewarded materials. CRD staff believe EPR works well and supports its continued use and expansion.

Most EPR programs such as those provided by the Product Care Association, Encorp Pacific and the Major Appliance Recycling Roundtable do an excellent job at meeting the intent EPR legislation with regard to accessibility and paying the costs of collection. However, there are other programs that while good, could be even better if they were to offer an improved network of collection locations and/or more fully covered actual collection costs. It is believed that, in some instances, the lack of collection locations could be helped by improving the compensation paid to prospective collection service providers.

As was mentioned, the EPR program for used oil and related products could be improved if additional collection locations were made available in the capital region. Similarly, the collection system for non-curb-side packaging such as film plastic and polystyrene offered by Recycle BC would benefit from an expanded depot network than is currently available. It is believed that the lack of options for film plastic and polystyrene could be helped if Recycle BC were to offer to more fully pay the actual cost of collection. This is certainly true for the five Gulf Island depots whose operations are subsidized by the CRD to provide this and other recycling services.

It is believed that legislated EPR should be expanded to include additional materials including all remaining household hazardous wastes currently not subject to the BC Recycling Regulation, especially pool chemicals, flares and propane tanks. EPR should also be considered for mattresses, which are costly to recycle and are challenging to landfill. Other commodities that it is believed should also be considered for EPR include furniture, carpeting & underlay and wood waste.

We would be pleased to discuss EPR with you and/or ministry staff further should you wish do so.

Sincerely,



Russ Smith  
Senior Manager  
Environmental Resource Management, CRD