

Good Day,

I would like to share my opinion on the proposed amendments to the Recycling Regulation of the Environmental Management Act to address plastic waste. As a brief background, we currently operate six 'Return It' depots on Vancouver Island. My partner and I have been operating the six depots for the last ten years and before that I have been personally involved in the business through my family and have witnessed the industry for approximately twenty years. The depots we currently operate are all under the business name of 'Island Return It' and we have depots in North Cowichan, South Cowichan, Saltspring, Sidney, Esquimalt and Campbell River. Many of our depots are considered Five Star Depots and collect a wide range of refundables, recyclables, electronics, paint, batteries, lightbulbs etc. We participate in the collection of recyclables for many different stewardship groups.

Deposit Level Increase:

I do fully support an increase in deposit level from 5 cents to 10 cents. However, I do not support the reduction of the 20 cent deposit on all beverage containers over 1 litre. I believe that we should not 'devalue' any refundable container. In British Columbia, we should only add value to our current system. As soon as you devalue something it becomes worth 'less' and I do not think that we should make any container that is ready to be recycled worth any less than it already is. All containers that are over 1 litre could be viewed as taking up more space than they are worth and in turn simply not returned for a refund. We will still need to account for the larger containers volumes in a certain way in order to prepare them for transportation to processors and I feel that reducing their deposit to 10 cents does not have any bearing on any efficiencies for the depot system. As stated in the clean BC report, the deposit levels can be reassessed in two years time to see if any changes need to be made. Having a baseline deposit rate of 10 cents for any container 1 litre and smaller will allow for a number of new efficiencies in the collection of all glass containers, plastics and tetra packs specifically. These three items in particular all share 5 and 10 cent deposits within their 1 litre and under category and harmonizing them to all hold a 10 cent deposit is a positive step forward in their refundable value and operating efficiencies of depots. It can potentially save time for customers and depots as well as the main priority of increasing recovery rates. I would argue that with the deposit rate being increased to 10 cents per minimum size container there may be an option for Encorp to lower container recycling fees which are charged to the consumer as non refundable.

Milk and Milk Substitutes:

Milk and milk substitutes should definitely be added to the list of deposit carrying ready to drink beverage containers. To me this is long overdue and should be a welcome change to all Return It depot operators. These containers are in fact ready to drink beverages and as such should fall under the same category of all other ready to drink beverage containers. I believe that they should in turn carry 10 cent deposit for 1 litre and smaller and 20 cent deposit for any container over 1 litre. Consumer confusion absolutely a real problem with respect to these container types and many of our consumers continue to try to return milk and milk substitute containers on a daily basis. As pointed out in the Clean BC Action

Plan, coffee shops, restaurants, schools, resorts, hotels or any other businesses or institutions are currently excluded from recycling their dairy containers under the Recycle B.C. residential packaging program. Adding these containers to the deposit system will instantly give these businesses an outlet to properly recycle all their beverage containers through the Return It system with no limits or exclusions and full refunds. Having all single use, ready to drink beverage containers in the deposit-refund system just makes sense and I fully support the inclusion of milk and milk substitutes into the deposit system. I believe the addition of milk and milk substitute containers to the deposit-refund system will in turn increase the awareness to the deposit of gable top and drink box containers. These two container types are often discarded because consumers may simply think they are the same as dairy containers and do not carry a deposit. It is something that I witness on a regular basis. There will be some groups arguing to not have a deposit on these containers and saying that putting a deposit on these containers will negatively effect families or low income households. I would like to point out that if a deposit is charged to the consumers then a deposit must be paid back to the consumer. Return it depots provide this service and the majority of consumers will likely receive their deposit.

As an independent Return It depot operator, I feel as though the Encorp recycling system could use some kind of a boost. There are far too many containers going missing every year and increasing deposit rates as well as adding milk and milk substitutes to the deposit system could help in giving the needed boost to the recovery rates. Curbside collection of these materials will likely continue however the materials should be properly reported on or banned from curbside recycling. If these containers are not properly reported on, we could see many containers go missing from record throughout BC even though they are being recycled. More stringent accounting may need to take place in order to properly account for these containers. In my opinion these deposit carrying containers should be treated with the same refusal as glass, styrofoam and film plastics. Many consumers are forced to return glass, foam and film to depots, so why would they not be required to do the same for beverage containers. Recovery rates would surely benefit from refundables being properly accounted for through return it depots. At this point in the beverage container recovery game I think we should be throwing all available resources towards increasing recovery rates for used beverage containers and I applaud the provincial governments willingness to act on these items. Higher deposit levels could simply add value to refundable containers and the addition of milk and milk substitutes could simplify the used beverage container collection system for all consumers. If ALL used beverage containers have a deposit then consumers can just bring every single used container they produce to their favourite refund location, receive a full deposit and recycle responsibly.

Single Use Plastics:

I do not have much of an opinion on banning single use plastics. I believe that if there is a place to actually recycle the material then much of it will be collected through the recycling depots or curbside collection. I would agree with a ban on plastic take out food containers which are highly wasted and never recovered. Organic-biodegradable solutions should be the way take out is served. Increasing the scope of materials to include single use plastics and packaging like containers will ultimately be good for recycling as a whole. In addition, many consumers try to recycle rubbermaid style plastics and tupperware containers. When these materials wear out they should be allowed to be recycled through the Recycle B.C. system as they could be considered packaging like and many of these items are highly recyclable, but because they are not sold as packaging they are exempt and in turn disposed of in landfills. Many consumers can not differentiate between packaging and products. Random dirty

plastics and yard/home/landscaping plastics could surely stay out of these recycle depots as most of these materials are contaminated and considered landfill. However good quality products such as tupperware or rubbermaid type plastics which are typically recyclable should be given consideration to be added to the acceptable product list. Any non deposit plastics that can be added to the acceptable products list for residential printed paper and packaging recycling will expand recycling recovery and reduce waste.

We would like to thank the ministry of environment for taking the steps to improve on and fill the gaps in the current recycling regulations. We appreciate having the opportunity to lend our voice and truly hope that all changes reduce waste, increase recovery rates and ultimately make the recycling process easier and more effective for all parties.

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