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File No.: 0530-02-01

VIA EMAIL: Env.Minister@gov.bc.ca

The Honorable George Heyman
Minister of Environment and Climate Change Strategy
PO Box 9047 Stn Prov Gov
Victoria, BC V8W 9E2

Dear Minister Heyman:

RE: Recycle BC – Packaging and Paper Product Extended Producer Responsibility Plan Update

At the Regional District of Central Okanagan (RDCO) Board meeting held on February 2, 2023 the Board of Directors endorsed the following resolution:

- ***THAT the Board send a letter to the Ministry of Environment and Climate Change Strategy opposing changes proposed by Recycle BC that would eliminate existing Recycle BC Depots within the Central Okanagan, and shift costs for the collection of EPR onto local governments.***

This resolution specifically relates to the community eligibility criteria proposed in the September 29, 2022 consultation draft of Recycle BC's Packaging and Paper Product Extended Producer Responsibility Plan (Plan).

The RDCO has reviewed the new proposed eligibility criteria of the Plan (Appendix C). While we are pleased to see the District of Peachland and District of Lake Country would become eligible for depots under the new criteria, we are very concerned the new criteria could exclude many existing depots in our current network.

The following is a summary of existing depots and eligibility under the proposed new criteria (as provided by Recycle BC):

Depot	Community	Meets New Criteria
Glenmore Landfill Depot	Kelowna	Yes
North Westside Depot (located at North Westside Transfer Station)	RDCO – Electoral Area West	No, if Trader's Cove removed then NWS would be eligible
Traders Cove Depot (located at Traders Cove Transfer Station)	RDCO – Electoral Area West	No

Westside Transfer Station Depot	West Kelowna	No
Planet Earth Recycling (Private Depot)	West Kelowna	No
Boucherie Bottle Depot (Private Depot)	West Kelowna	No
Columbia Bottle Depots (x3 Private Depots)	Kelowna	Yes

While Recycle BC has stated verbally that depots in West Kelowna would likely continue, the criteria as written allows for Recycle BC to no longer support these depots.

Additionally, although Peachland would be eligible for a depot under the new criteria, the criteria does not guarantee that a depot would be sited in Peachland. Loss of depot eligibility in West Kelowna could mean Peachland residents would have to travel a minimum of 18 km to the nearest eligible depot in Kelowna or go out of region and drop material off in Summerland which is 22 km away.

The following is a summary of concerns related to existing depots becoming ineligible under the new proposed criteria:

1. Five of seven existing depots in the region, including two rural transfer station depots, one regional depot and two private depots, would no longer be eligible for funding from Recycle BC for the collection and recycling of packaging and paper materials. This would disproportionately reduce service for rural residents in the region.
2. If the RDCO chose to continue operating non-eligible local depots, taxpayers would be funding the management of paper and packaging, not producers.
3. The population on the westside of Okanagan Lake (West Kelowna, Peachland, Westbank First Nations, RDCO Electoral area West) is 55,664. Should private depots and the RDCO depot in West Kelowna cease to operate as a Recycle BC depot due to the new criteria, this population would be required to drive into Kelowna for depot services, contributing to the already very congested commute into Kelowna.
4. If non-eligible private depots in West Kelowna close, it would be a significant decrease in access to service. A reduction in service would run counter to efforts being made to reach regional waste diversion targets identified in the Regional Solid Waste Management plan.

The RDCO asks that the Ministry carefully consider what is being proposed in Recycle BC's Stewardship Plan update and how it impacts residents not only in the Central Okanagan but the rest of British Columbia as well.

Yours truly,



Loyal Wooldridge
Chairperson