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To MMBC:

I have many concerns about the haste with which this new PPP EPR policy is scheduled to be introduced, without sufficient, careful examination of both the positive and negative effects this policy could have upon existing operations within BC.

While the policy's focus seems to be on the promise of “producer paying 100%” and the achievement of some recycling efficiencies, there appears to be insufficient detail(s) concerning the overall implementation of these promises.

The old adage of “be careful what you wish for” could apply, especially if these promises are unfulfilled.

We must all review this document, keeping in mind the economic realities in BC communities; the downstream effects on recycling these products, including projected changes to existing systems within the province; whether there are alternative methods of achieving the intended outcomes; and, the possibility that increased taxes are the only method of offsetting any failures of this policy to achieve the stated goals. <http://multimaterialbc.ca/consultation>

This rush to pass this proposal seriously limits the time to properly review it and I would urge an extension be granted for policy analysis and submission of comments such that all stakeholders can properly review all effects on their communities and on the environment.

## **Concern: lack of time for stakeholders**

As a stakeholder, I am a private recycling business offering both depot service and subscription curbside collection in our community all ready. Our recycling depot/One Stop Drop/Resource Recovery Centre is also a collector of many other EPR programs. Our innovative forward thinking recycling business is also a primary processor. Our business is contracted by local government to collect some of the materials listed as PPP items. Our company currently collects items not listed as PPP items, such as books in our mixed paper as well as plastic film and garbage bags in our plastic film recycling program.

As a stakeholder, I am an advocate for local business and local economy, zero waste and no incineration. I am a waste reduction educator and researcher and I am from a rural community with transportation challenges as well as economic challenges. . I am also a resident in a single family dwelling and am a residential recycler.

All stakeholders are not involved in this process because of the lack of information and education, particularly individuals like ordinary residents and taxpayers, as well as our elected officials. There has been little educational information for the public, that would inform them/us of what items will be accepted, how it could change their/our current recycling efforts, how will it effect prices of products at the point of purchase, how it will effect the contribution they/we make to local taxes and all of these are questions that need answered before even thinking of signing onto this plan.

There has been very little information on how this policy will affect local government budgets for recycling. There has been no tangible numbers to make an informed decision or choice. Many local elected officials are uninformed and have difficulty commenting on the unknown factors that this policy paper presents.

Some of the stakeholders that have been closely involved in this process of designing this PPP EPR policy paper, could be classified as “double-dippers” since they sit on some other not for profit boards, for profit boards and organizations such as the RCBC, CWMA, Retail Council of BC and MMBC and have close financial interests as private profit generating businesses or have the cross over of being local government and directors of

non-profit organizations. Listed are a few examples to point out that “all stakeholders are not involved.”

**Concern** : limited information available to all stakeholders.

In section #4 in the plan titled “Program Design” it does not address the complexities of existing program designs. For instance a facility may be both a collector and primary processor; they may also be a business, not for profit or government. They may take multi materials, they may commingle for transportation, they may have source separation, and they may mix and or transport tin cans with white goods or other metals and or have commercial materials in their /our programs already. They may already be able to handle and collect glass and polystyrene and plastic film and bags and may already have a higher diversion rate handling many more items and materials then the program being proposed???

Each community’s recycling programs have unique challenges and or geographic impediments and or limitations. And factoring in local community solutions for given challenges means that a one size fits all ‘solution” might be detrimental not only to the financial challenges each community has but what negative environmental implications might come with an over simplified program designed by non residents for any given community. An example of over-sight in this plan is while government gets a financial incentive for education, a private facility that is both a private enterprise collector and primary processor, in this proposed PPP EPR plan, a private recycling business, according to this PPP EPR plan, are not acknowledged as delivering public education and promotion which is erroneous, thus not being compensated for these services and cost. These kinds of over-sights can be made by making assumptions and not investigating the unique challenges of each and every recycling program. There may be many valid reasons for the unique designs of communities recycling programs that an outside steward, consultant or producer(s) would not be aware of.

The PPP EPR program design as written now, does not acknowledge that existing recycling programs that are already integrated into the fabric of a communities recycling program, may already be taking items and materials not listed in this PPP EPR program. Most communities have successful programs already designed to take mixed paper which includes books (not a PPP item) and plastic garbage bags or bulk packaging (not PPP items).

Many current community recycling programs are designed not just for the PPP acceptable materials but are designed for the overall needs of the community and any given challenges a community might have.

MMBC does not assume the responsibilities but instead supplants the control of the recycling of the listed items PPP EPR only. The local government is still responsible to deal with any of these PPP EPR listed products as well as all the other materials in the discard stream that are not “successfully” recycled.

This plan does not release local government from the responsibilities of overseeing and insuring that there are both programs and services in place to manage “discarded materials”.

If producers actually paid 100% of costs for PPP EPR materials, then local government should have no additional costs. But if there is only 75% diversion of the PPP EPR materials, from the waste stream, that would mean 25% of the packaging is likely to go into tax funded programs (ie; landfill). There is little indication that local government’s responsibility will be diminished, particularly with the on going responsibilities of making sure that all the community’s “recycling and discard management” needs are serviced.

**Concern:** I do not believe that an organization made up of producers that make products and packaging should control what a community does with recyclable materials. I do not think that large foreign corporations have the commitment to local communities or the knowledge to take-over this responsibility at the local level. I do not believe that consultants not living in a community, have the practical knowledge or information to dictate the design, costs or implementation of community recycling programs, especially if a community has programs in place that surpass what PPP EPR proposes.

Can we be sure that a large corporation wanting to minimize costs will not insist on “recycling” systems that are not beneficial to the community or environment? While there are concerns by municipalities of increasing recycling rates, for example, of refundable beverage containers by expanding deposit fees and giving fair compensation to collectors, producers decided that they did not want to pay an increase in deposit fees and that

some of the producers felt that Waste To Energy was “a viable recycling alternative”.

Ontario PPP Producers have also promoted WTE as a method of recycling. I do not agree that MMBC are assuming responsibility for 100% of the recycling of these PPP EPR products and I do not agree with them controlling recycling systems for the very example as seen in Ontario.

The two core elements of separating collectors and processors will create more cost and paperwork and more bureaucracy. According to the PPP EPR plan, the contracting for collectors and processors is two separate and different functions. In the first function, collecting contracts are awarded and in the second function, processors must bid on an RFP. So what happens if the current collector and processor are only contracted for one part of the function? Our business model for the past 10 years, for example, is based on performing both functions. So, without the processing part, we and many other handlers and service providers could be forced to take materials to processors who do not pay us the same revenue stream currently received. In the PPP EPR plan, could an ‘approved’ processor under pay an ‘approved’ collector, who also may be a competitor of the approved processor?

**Concern:** Business and local government are expected to agree to a program that does not clearly define what the market clearing price is. Local government and existing businesses have little input into what this financial incentive called “market clearing price” is. Instead the payment is calculated by the stewards, who decide the costs that they want to pay for collecting and processing services.

Again, why do local governments receive a financial incentive to provide public education but a private company already providing educational services does not? The “approved contracted” service provider should provide public education and it is the service provider that often incurs these costs and it is the service provider who may have first hand information on the kind of public education that is required. If PPP EPR claims to take the responsibility of managing these PPP EPR materials off the shoulders of

“local governments”, why is local government being compensated for education?

If local government’s are given the responsibility to educate, and are paid for these services, how does this “diminish and takes the weight off of local government” or does it just give compensation for an action, “education”? My experience with other EPR programs is that as the collector, we must pay to promote and educate about the and given EPR program we run in our community. The local government also must pay to promote the EPR programs on their websites and with educational materials. Often an EPR program provides brochures and signage that do minimal educating and do not promote the location of the local facility, in the individual communities. How is this EPR program going to cover the full costs to all, for advertising and education? Advertising is one of the costs incurred by businesses, government and non profits, and what about all the other costs and including the fixed costs or costs to improve or maintain recycling programs? Will these costs be covered?

Market clearing price “the price that sellers want to sell and buyers want to buy at” in this case is the price the steward (the producers of the products) wants to give. “An effective market –clearing price should reward and encourage continued efficiency by those who can deliver the service at less than the market-clearing price while encouraging initiatives to reduce costs where costs exceed the market-clearing price” as stated in the MMBC plan, suggests that there will be different fees for different communities, not everyone will be equally compensated and that this MMBC “market clearing price” financial incentive will not pay for all the true costs of community recycling programs and it will not pay all the true costs for improvements in the recycling system. The PPP EPR statement, also suggests that those with greater costs will be penalized, by insufficient payment for services rendered. This statement also promotes our interpretation that “the purpose of this proposed PPP EPR program is too guarantee that the stewards and producers pay as little as possible and place financial pressure on already struggling municipalities and recycling businesses, to collect more with less.”

This PPP EPR plan does not promote and support keeping collected materials as high quality products or promote environmental beneficial choices. If producers and this PPP EPR steward organization is actually taking responsibility for these listed products and their end of life

management, would there be such an emphasis on cost reduction at the collectors and processors end, or would there be more emphasis on product re-design changes and changes in consumers purchasing habits? Are we still going to have consumers complaining about the amount of packaging that they bring into their homes with purchases that create discarded packaging that they have to manage? Does this policy paper acknowledge that in the pricing of products, consumers are already paying for the cost of materials used in packaging the products they consume and does it guarantee that prices of products will go down as less packaging is used? Is there a commitment by producers to educate consumers to buy products that have less packaging? Is this stewardship plan just a system to allow producers to continue manufacturing and selling poorly designed products and packaging that steadily increases that amount of discarded resources, needing to be managed at the household?

**Concern:** Market clearing price does not promote reduce, re-use, a collection system of high quality recycling or support local community and the local economy. A flat rate per household does not take into account rural costs or population densities or distances from processors. Reviewing the flat rate fee in Manitoba's program I see challenges such as, while the City of Winnipeg would receive \$98 per tonne, Winkler Manitoba, a neighbouring border community, would receive \$157 per tonne and Flin Flon, a more remote Northern community would receive \$157 as well. Winkler, while a small population, is closer to urban markets and processors and while smaller than Winnipeg, it would share similar transportation costs and benefits by being more like an urban location, closer to the larger city processors. Does the \$157 per ton cover the costs of recycling in Flin Flon and getting their materials to markets? Flin Flon's non-profit recycling organization has to undertake a community fund raising effort for the total of \$100,000, to purchase a baler, to improve recycling efficiencies; I would imagine this is an example of the PPP EPR financial incentive, not paying for increased efficiencies, the very efficiencies the PPP EPR plan states it supports.

I also noted that "costs above the clearing market price paid, were the sole responsibility of the municipalities and payments were on a three year rolling average of the net costs of participating municipalities", so while a community may have unique challenges and costs, they are paid an average flat fee for the services rendered. This PPP EPR "one size fits all" model of

funding and compensation does not pay for all current costs incurred by municipalities, so any “stratification” to accommodate changing circumstances is not immediate.

Price level or quantity of financial incentives, including best practices allocations and performance allocations that in Ontario’s program results in some communities only being paid less than a third of their net costs. Again, this kind of payment system has created actions businesses and municipalities that do not support local industry but supports the shipping of dirty commingled recyclables to China, it has created additional costs to some local governments, to build, for example, new systems (\$6,000,000 for one MRF in one community) and also supported the promotion and support for incineration, as a recycling solution, in cash strapped communities. It should also be noted that the data to determine the payment for services rendered is based on data collected by the stewards, from municipalities, from two years prior. Meaning, the payments for services today are based on figures and data from 2 years earlier. This might not match or pay for the current costs

Does this kind of payment incentive, the more you collect for less, the more you get, collection system really reward communities for their recycling services? Or is this type of PPP EPR payment system more in keeping with something closer to cheap disposal services, creating needlessly high residuals streams, using ineffective collection methods, with WTE and landfilling as quick and convenient solutions at the end of the pipe? It is in the PPP EPR plan that it says in essence, the plan says “we support the constant improvement in recycling these PPP materials”. Is there constant improvement in the proposed PPP EPR system? Or, as in 2011 in Winnipeg, who experienced a decrease in materials collected, there is not an improvement there. Does every community get the same opportunities? Or will it be like Manitoba where there seems to be a limited and selective number of communities that are supported with funding for educational programs and supplying technical assistance for helping to improve collection and only a limited number of communities receive these benefits?

The contractual and business arrangements that the proposed MMBC policy plan means that both businesses and local government must change their business and operational plans, perhaps even their infrastructure, to accommodate the unknown coming with PPP EPR. Issuing RFPs for the lowest bidder for processors could harm many existing local recycling

operations that have been the recycling pioneers, already moving diversion targets of newspaper, mixed paper and plastic to new highs.

**Concern:** This proposed PPP EPR policy and plan is creating a bureaucratic maze of redundancy and double reporting when the processor is also the collector. There are two distinct systems for receiving recycling contracts and a facility that is both collector and processor has to apply or be contracted for one part of the work and bid on the other. So what happens if our local recycling depot is a collector in our community and their bid to be a processor is turned down? Now this depot, as collector, has an additional cost of trucking materials to a processor who does not pay the amount for materials that the collector would have received by taking the materials to market themselves, now the MMBC PPP EPR plan will limit how this facility can do business. So this will cause a negative impact.

Dispute resolution is one sided, because all the power is given to the steward. While in the early days of Ontario's blue box program there were lawsuits between the stewards and several municipalities. This took place and there is evidence of lawsuits between the steward and municipalities, who claimed "they were not paid or they were not paid the agreed amount", legal action is very costly for local government or non-profits and small business. The producers as stewards become the major voice of how the program will operate and they set the rules. There must be a more balanced dispute resolution for fairness for all.

Each region in BC does a SWMP as regulated by the Provincial MOE. There is both a financial cost to taxpayers and costs in the time to write these plans, review these plans, and change if PPP EPR alters community SWMPs. In each of these SWM plans, there is recycling data, including tonnage collected of materials and there are also plans to increase diversion. We now are being asked by MMBC to have more administration and data collection for these materials, to be made into a report for MOE, at a cost.

**Concern:** How much is this new added administration cost, to local government, business and consumers in this PPP EPR program going to be? What is the percentage that will be sliced off the available fees for administration by the stewards? We already note that tax funded programs will pay for the disposal of the 25% not diverted but this fee will be kept by stewards. And what if a given community has an inferior collection method

that generates a higher level of contamination that sends more contaminated recyclables to the landfill and/or incinerator? Who pays for the landfill infrastructure and hauling costs? And given these simple scenarios, how come the stewards get to keep the money by not having to pay for these materials since they are not in the PPP EPR stream that does not see this material go to recycling markets? So how much money will actually be filtered down to the communities? Will stewards be paid market place price or will they establish their own administration costs? When MMBC promotes this EPR program as “producers pay 100% of all costs” this is not factually accurate. In many BC EPR programs such as batteries, fluorescent tubes and bulbs there is funding from eco fees gathered to pay for consultants, for administration costs to be covered as well as the transporters to also be compensated by stewards but no payment for the collectors who must assume the risks and costs of the program including labour, taxes, infrastructure while eco fees are promoted as paying for “all the recycling costs” for these materials. How is this PPP EPR program going to be different? If some municipalities in Ontario do not get 50% of their blue box costs now and in Manitoba municipalities do not get 80% of their blue box costs now, are we just going to be paying some stewardship organization for a new hidden “consumer tax”?

**Concern :** Including non-recyclable materials in the PPP EPR program that is about collection of recycling and recyclables, falsely promotes that these materials are being actually recycled, not disposed of. If products are non-recyclable, why is the MMBC not contributing financial incentives to curbside garbage collection costs then? Is this program forcing communities to collect these non-recyclable items that are designed for destruction, with a plan to incinerate these materials, thus promoting WTE, then how does this jive with the Recycling Council of British Columbia’s No Burn policy which states: “there is no burning in ZERO WASTE and this is both the ZWIA (Zero Waste International Alliance and the RCBC policy”.

What data supports that these PPP EPR materials will be redesigned, as claimed for so many years now? A recent paper written for the Grocery Manufacturers Association in regard to advances in sustainable packaging, pointed out that packaging change and/or redesign may mean less tonnage going to landfill, less emissions through using lighter materials and better design. But currently, much of the packaging material is still not recyclable. A review of comments made by an industry source in Ontario regarding

changes to fee structure, displayed reluctance from producers of hard to recycle items to pay more and to pay for current disposal. Who then must pay for community recycling system changes, including new and different equipment, in response to the producers proposed changes in packaging? If a system has to take materials that they can not sell as a recycling commodity or reuse, are stewards prepared to assume the actual costs of bringing this material into a local system? If only one style of recycling is used that causes problems with machinery if plastic bags, polystyrene and glass enters the system, why on earth would any community use such a backward way of handling recyclables? Is WTE going to be the one size fits all disposal/recycling solution?

**CONCERN :** If a hidden fee is added to the cost of our consumables, how will an increase in the price for most products purchased by residential consumers, effect the cost of living in small communities in BC? What will be the increase per unit sold? What happens to the many shoppers living along BC borders who will choose to buy products at a lower price in the United States or Alberta, that have no fees charged for the recycling of these materials, who pays for the recycling of these materials?

MMBC's aspiration includes expanding the collection system to accommodate a uniform province-wide list of PPP materials available for "recycling". While this is a commendable goal, how is taking in for recycling something like rigid plastics in a remote northern or ferry access community, going to take into account, the costs may be excessive and the carbon emissions of transportation wasteful? Could it not be more beneficial for these communities, to reduce the plastics coming into the community and perhaps have access to refillable containers instead? Developing local markets and reuse of materials locally takes capital investment; there is no indication that there would be funds available from this program to support such endeavors, which is raising the bar. Starting new local businesses to recycle or make use of these products takes feed stock and a supply stream Will this steward controlled PPP EPR recycling program circumvent valuable feedstock which could be used by BC Industry and businesses? Several years ago, Ontario blue box recycling was reported as sending dirty recycling and blue box leftovers to China, in news stories. At the same time stewards and government staffers and some politicians took paid junkets to China and other Asian communities to source out "recycling" markets local in China for blue box recycling. Is this something the same producers of

products in Ontario, supposedly with the same level of responsibility PPP EPR will have here in BC, and the same producers and companies who will now belong to a different stewardship organization in BC will do here? Is this what we can expect here in BC? Where in this document does it say we will foster BC recycling industry and businesses? Where does it say that BC recycling industry will be protected?

**Concern :** This policy paper does not address the many questions on how this stewardship program will be delivered. In fact, reading the life cycle management section in this PPP EPR policy brings nothing new to the recycling table for BC communities. While the producers may strive to reduce their environmental impacts, any redesign may not mean the container or packaging is more recyclable and there is a viable “recycling” market for them. The amount of packaging in the marketplace is increasing, the number of products in the marketplace is increasing, the amount of discards is increasing and costs are increasing to handle these products. This PPP policy arrangement does not pay the full costs, because communities do pay for the environmental impact on their communities, communities pay for the economic impact of both the products and the discard management systems, while this policy only partially supplements the true costs to communities.

The waste hierarchy in this proposal does not give specific actions that will be taken by producers or stewards. If reduction of what we consume is the first step in the waste hierarchy, this PPP EPR “recycling” program is meant to continue consumption of products and sales of products and manufacture of more products and poorly designed and excessive packaging. PPP EPR is a program to make collection convenient and easy, making discarded items go away, so we can buy. Reusable packaging that is refilled or used repeatedly is not stipulated or supported, and reducing weight of packaging does not encourage reuse of glass and does not mean the light weight materials used will make the items more recyclable. Transporting inefficiencies and emission issues transporting lightweight materials, for example, the steward handling beverage containers are filling transport trucks with non-compacted plastic water bottles and non compacted aluminum cans. So, even light weight packaging materials generates a huge carbon foot print and a waste of financial resources shipping non densified materials.

There is no evidence that there will be redesign of products that will make them more recyclable using “cost allocation” in this program with a fee charged more for items that supposedly are harder to recycle. There are many marketing factors associated with the design of products and the bottom line is if the product sells producers are happy. There is nothing that addresses packaging changes effecting costs to communities to recycle and reeducate. In many of the EPR materials that I handle on a daily basis I see new models of products being recycled on a regular basis. I see no reduction in using battery operated equipment because there is a battery recycling stewardship program. We as a society continue to consume and discard at an alarming rate, how does this PPP EPR program address that what is really needed is behavior changes, that may conflict with the producers desire to sell more products?

If the stewards control the recycling programs, will reuse programs have to cost less than recycling in order for reusers to be accepted by stewards? If glass is reusable as a container, will the PPP EPR “cost allocation” pay for glass to be refilled as a container? Will PPP EPR pay for glass to be reused as a container? So will the producers of glass have to pay more while producers of some plastics will pay less? How will this cost allotment translate into highest and best use?

Recovering energy or waste to energy (Burning) is not an environmentally responsible option and it is not supported by the RCBC and ZWIA who are against burning. Does this not pose a conflict position, since several RCBC boards of directors also work for MMBC. Does this mean that either the RCBC must support WTE or does this mean MMBC must abandon WTE as a “recycling” option?

**Concerns :** This PPP EPR policy “waste hierarchy” does not guide people to changing lifestyles by reducing items consumed and discarded. The discarded materials may become garbage in another community. There is nothing that reduces the toxicity of packaging materials ie; plastics. As an example there is no ban on BPA plastics used in food and other packaging. There is no conservation of resources and both burning for energy and burying are part of the promoted PPP EPR hierarchy. Problem packaging is not restricted from sale by producers or banned in this policy .Therefore this plan is not in keeping with Zero Waste policies or follow the principal’s of

Zero Waste. Yet the RCBC support Zero Waste? Does this mean MMBC does not?

“Zero Waste is a goal that is ethical, economical, efficient and visionary, to guide people in changing their lifestyles and practices to emulate sustainable natural cycles, where all discarded materials are designed to become resources for others to use. Zero Waste means designing and managing products and processes to systematically avoid and eliminate the volume and toxicity of waste and materials, conserve and recover all resources, and not burn or bury them. Implementing Zero Waste will eliminate all discharges to land, water or air that are a threat to planetary, human, animal or plant health.” [ 4 ]

Zero Waste involves moving from the back end of waste disposal to the front end of resource management “If a product can’t be reused, repaired, rebuilt, refurbished, refinished, resold, recycled or composted, then it should be restricted, redesigned, or removed from production.”[5]resold, recycled or composted, then it should be restricted, redesigned, or removed from production.”[5]

In the review of this PPP EPR policy paper, I find there are too many questions unanswered on how this program will be delivered. How much it will cost? How much will it contribute to local recycling initiatives already performing and progressing? What is the benefit of this program? And what will become of the hundreds and hundreds of existing small to medium recycling businesses and not for profits as well as some exceptional municipal and regional recycling programs here in BC. I see the support of there being less diversity and an increase in monopolies.

This policy paper is like the shoe salesman trying to make a sale without first finding out if the person wants shoes, without measuring the foot and determining if the person can pay for the shoes. Most consumers are not going to buy the shoe without seeing if it fits first but the MMBC is expecting local governments to buy this program without seeing how it will effect staffing, budget, local economy and environment.

There is evidence produced by a recent study “Evaluation of Extended Producer Responsibility for Consumer Packaging”, commissioned by the Grocery Manufacturers Association which brings to light, even more questions about the cost efficiencies of a PPP EPR program, as well as the

diversion benefits particularly since both Manitoba and Ontario EPR program was reviewed for this study.

[http://www.gmaonline.org/filemanager/Sustainability/GMA\\_SAIC\\_EPR\\_Report\\_091112.pdf](http://www.gmaonline.org/filemanager/Sustainability/GMA_SAIC_EPR_Report_091112.pdf)

Until we all can make an informed choice about this program with tangible outcomes and delivery methods, backed by real numbers for costs and payments, as well as true ZERO WASTE goals, I can not endorse this plan.

Finally, we must look very carefully at who has been hired to help design this PPP EPR program here in British Columbia. We see many instances of “conflicts of interest” and as I mentioned earlier, “double dipping” by certain stakeholders who have vested interests in the outcome going a certain way. Is the playing field truly a level one? Are all stakeholders truly welcomed in this process?

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## **REFERENCE MATERIAL**

These are some of the other source materials I referenced, in addition to the materials provided to the public, by MMBC:

[http://www.gmaonline.org/filemanager/Sustainability/EPR\\_fact\\_sheet\\_091112.pdf](http://www.gmaonline.org/filemanager/Sustainability/EPR_fact_sheet_091112.pdf)

[http://www.gmaonline.org/filemanager/Sustainability/GMA\\_SAIC\\_EPR\\_Report\\_091112.pdf](http://www.gmaonline.org/filemanager/Sustainability/GMA_SAIC_EPR_Report_091112.pdf)

<http://www.productstewardship.org/ppsrev60.pdf>

<http://www.ubcm.ca/assets/Library/Policy~Topics/Policy~Papers/2012/2012%20Policy%20Paper%202-Packaging%20and%20Printed%20Paper%20Product%20Stewardship.pdf>

<http://www.vancouver.sun.com/technology/From+trash+cash+garbage+future+Metro+Vancouver/7316781/story.html#ixzz2AvfF86nR>

<http://www.newspaperscanada.ca/public-affairs/recycling>

<http://www.stewardshipontario.ca/stewards/what-we-do/blue-box/whats-new>

<http://www.stewardshipontario.ca/sites/default/files/Consultation%20on%20Preliminary%202011%20BB%20Fees1.pdf>

<http://www.wdo.ca/files/domain4116/Final%20Guide%20to%20the%20BBP%20Nov%2016%2005.pdf>

<http://www.bramptonguardian.com/community/article/1020087--unravelling-the-packaging-problem>

<http://www.bbc.guelph.org/munworld/2012-EPR.pdf>

[http://www.cielap.org/pdf/BlueBoxReview\\_Feb09.pdf](http://www.cielap.org/pdf/BlueBoxReview_Feb09.pdf)

[http://archive.grrn.org/epr/skillshare/buffalo/Clarissa%20-%20EBR\\_BBPP.pdf](http://archive.grrn.org/epr/skillshare/buffalo/Clarissa%20-%20EBR_BBPP.pdf)

[http://www.stewardshipmanitoba.org/municipalities/files/MMSM\\_Registrati on\\_Guide.pdf](http://www.stewardshipmanitoba.org/municipalities/files/MMSM_Registrati on_Guide.pdf)

[http://www.stewardshipmanitoba.org/municipalities/files/MMSM\\_Registrati on\\_Guide.pdf](http://www.stewardshipmanitoba.org/municipalities/files/MMSM_Registrati on_Guide.pdf)

<http://indec.com/www.nsf/Ideas/bluebox>

[http://www.wdo.ca/cif/pdf/reports/261/261\\_appendices.pdf](http://www.wdo.ca/cif/pdf/reports/261/261_appendices.pdf)

<http://multimaterialbc.ca/consultation>

