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Thompson-Nicola Regional District

Solid Waste Management and Resource Recovery Plan Update



Solid Waste Policies, Bylaws and Enforcement

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May 1, 2017

Mr. Jake Devlin
Director of Environmental Services
Thompson-Nicola Regional District
300-465 Victoria St
Kamloops, BC
Canada, V2C 2A9

Dear Jake,

Re: TNRD Solid Waste Management Plan Review – Solid Waste Policies, Bylaws and Enforcement

We are pleased to submit this report that discusses how policies, bylaws and enforcement can contribute to an effective waste management system.

The information contained in this report will be presented to the Review Advisory Committee and is intended to seed a discussion regarding the potential application of these ideas to the operation of regional and municipal solid waste operations.

Yours truly,

Maura Walker, President
Maura Walker and Associates



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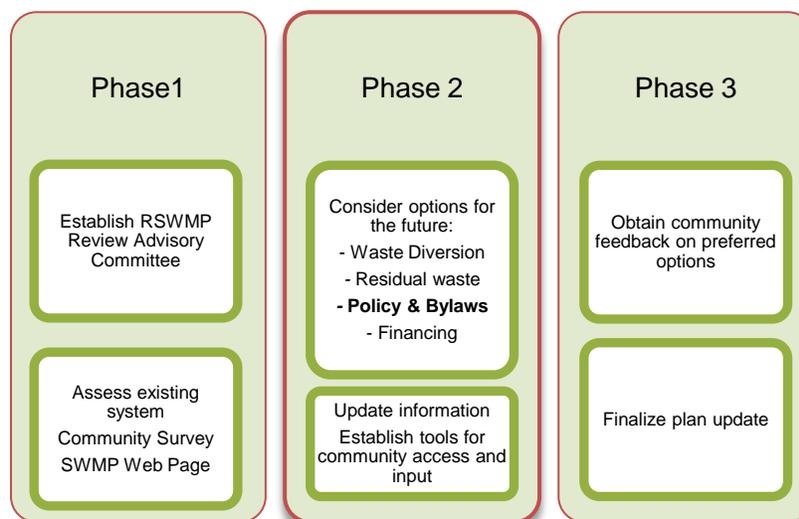


1 Introduction

The Thompson-Nicola Regional District (TNRD) is currently updating its 2008 Regional Solid Waste Management Plan (SWMP), which was an update of the original plan approved by the province in 1995.

The process to review the plan is being conducted in three phases as indicated in Figure 1-1.

Figure 1-1: Plan Review Process



The first phase, which is complete, consisted of the establishment of the Regional SWMP Review Advisory Committee (RAC) as well as an assessment of the current solid waste management system and a status report on the implementation of the 2008 Plan. Phase 1 also included a concurrent communication and consultation program consisting of a community survey and SWMP web page.

The second phase, the current phase, entails a review of options to address the region's future solid waste management needs and the selection of preferred options. To date, reports and presentations regarding waste diversion options and residual waste management have been prepared and discussed. This memo addresses policies, bylaw and enforcement options that can be the foundation of a successful solid waste management system.

The third phase of the planning process will consist of a community and stakeholder consultation process to obtain input on the selected options.

This report presents the following policy and bylaw options:

- Solid waste bylaws (collection service bylaws and facility regulation bylaws)
- Tipping fees: variable tipping fees and tipping fee uniformity
- Disposal Bans and Enforcement Options
- Operational policies and procedures



- Waste Stream Management Licensing and Codes of Practice Bylaws
- Extended Producer Responsibility Policy

1.1 Policies, Bylaws and Waste Diversion

Policies and bylaws define the “rules of the road” for how solid waste can be managed in the TNRD. They can also be applied to achieving many of the goals identified for this solid waste management plan, including:

- Improve the level of ICI Recycling,
- Divert organic waste from disposal (where it is reasonable to do so),
- Divert wood waste from disposal (where it is reasonable to do so), and
- Ensure financial sustainability.

Policies and bylaws to encourage waste diversion and to achieve the above targets will be integral to the success of the Solid Waste Management Plan. The Waste Diversion Options Report prepared and discussed in March 2017, presented the following options that would be driven by solid waste policy, bylaw and enforcement:

1. To improve the level of ICI Recycling:
 - a. Apply differential tipping fees to encourage source separation
 - b. Implement disposal bans on recyclable wastes like cardboard and metal
2. To divert ICI sector organic waste from disposal:
 - a. Support private collection through the application and enforcement of a disposal ban on organic waste
 - b. Amend the City of Kamloops Bylaw 40-63 to require that ICI generators of organic waste to have an organic waste collection service in place.
3. To divert construction and demolition waste:
 - a. Minimize wood waste in the landfill
 - b. Expand disposal bans to include clean wood waste and asphalt shingles
 - c. Enact and enforce similar bylaw requirements for all City of Kamloops landfills
 - d. Require new commercial developments to incorporate space for management of garbage and recycling in their design
 - e. Require waste management plans for large construction, demolition and renovation projects
 - f. Restructure permit fees to promote deconstruction.

2 Solid Waste Bylaws

There are typically two types of bylaws that local governments adopt to manage solid waste: collection service bylaws and facility regulation bylaws. Collection service bylaws regulate the curbside collection of garbage, recyclables and organics from primarily single family residential customers, although in some



cases, such as the City of Kamloops, the curbside collection service is also available to multi-family and ICI customers. Facility regulation bylaws apply to recycling and disposal facilities and establish regulations, conditions of use as well as user fees and penalties.

In the City of Kamloops, these two types of bylaws are combined into one - the City of Kamloops Solid Waste and Recyclables Bylaw 40-63 which provides a system for the collection, removal, and disposal of solid waste and recyclables. As indicated in Table 2-1, this bylaw is divided into twelve divisions of which most apply to the curbside collection service for garbage and recyclables with only Division Nine applying to disposal facilities.

Table 2-1: City of Kamloops Solid Waste and Recyclables Bylaw 40-63

| Division | Topic | Type |
|-----------------|---|-------------|
| Division One | Definitions and Interpretation | Both |
| Division Two | Administrative | Collection |
| Division Three | Solid Waste Disposal Requirements | Collection |
| Division Four | Recyclable Disposal Requirements | Collection |
| Division Five | Cart Collection Service of Solid Waste | Collection |
| Division Six | Cart Collection Service of Recyclables | Collection |
| Division Seven | Fees, Subsidies and Set Out/Set Back Services | Collection |
| Division Eight | City Bin Collection Service – Solid Waste and Recyclables | Collection |
| Division Nine | Disposal Sites | Facility |
| Division Ten | Fees and Charges | Collection |
| Division 11 | Offences and Penalties | Both |
| Division 12 | Schedules | Both |

Table 2-2 outlines the schedules attached to the Bylaw. Schedules A, B, C and D apply to the curbside collection service, Schedule E applies to the Cinnamon Ridge compost facility, Schedules F, G, I and J apply to disposal facilities and Schedule H applies primarily to the curbside service with the exception of illegal dumping at disposal sites.

Table 2-2: City of Kamloops Bylaw 40-63 Division 12 Schedules

| | |
|------------|---|
| Schedule A | Rates for Cart Collection of Solid Waste |
| Schedule B | Rates for Cart Collection of Recyclables |
| Schedule C | Rates for the Multi-Family Bin Collection Service – Solid Waste and Recyclables |
| Schedule D | Rates for Commercial Bin Collection Service |
| Schedule E | Rates for the Sale of Compost |
| Schedule F | Rates for the Mission Flats Landfill |
| Schedule G | Rates for the Barnhartvale Landfill |
| Schedule H | Fine Schedule |
| Schedule I | Rates for Kamloops Recovery Centre |
| Schedule J | Solid Waste Materials Accepted at City Landfill Sites |



With respect to meeting the diversion targets discussed in Section 1.1 above, while the City of Kamloops bylaw provides a curbside recycling service and prohibits the disposal of cardboard, newspaper and grass clippings in curbside garbage, there are no similar prohibitions on the disposal of these materials at City disposal facilities.

The City is currently reviewing their solid waste bylaw with the objective of bringing it up to date and improving its clarity.

The TNRD regulates and sets fees for TNRD municipal solid waste disposal and recycling facilities under Solid Waste Management Facilities Bylaw No. 2465, 2014. Table 2-3 provides an outline of the sections and schedules to this bylaw.

Table 2-3: TNRD Solid Waste Management Facilities Bylaw No. 2465, 2014

| Sections | Schedules | |
|--|------------------|-------------------------|
| Definitions, Interpretations and Schedules | Schedule A | User Fees and Penalties |
| Regulations and Conditions of Use | Schedule B | Controlled Waste |
| Violations and Penalties | Schedule C | Recyclable Materials |
| Inspections | Schedule D | Site Regulations |
| Appeal | Schedule E | Prohibited Waste |
| Repeal | Schedule F | Customer Accounts |

As indicated in Table 2-4 below, TNRD Bylaw 2465 defines certain materials as controlled wastes, prohibited wastes and banned recyclable wastes. Implementing disposal bans on recyclable wastes was identified in the 2008 SWMP. Although the bans are included in the bylaw, the TNRD has not enforced these recyclable material bans due to a lack of staff capacity to undertake the communication and education efforts that would be required to effectively implement the bans.



Table 2-4: Controlled, Prohibited and Banned Recyclable Materials in TNRD Bylaw 2465

| Controlled Waste | Prohibited Waste | Banned Recyclable Materials |
|---|--|--|
| <ul style="list-style-type: none"> •Animal Feces •Asbestos – Friable and Non •Bulky Waste •Clean Fill •Concrete •Condemned Foods •Contaminated Soil •Creosote Treated Wood •Small Dead Animals •DLC Waste •Dusty Material •Infested Vegetation •Metal Drums and Tanks •Noxious Weeds •Out of Region Waste •Sharps – Residential •Tree Stumps | <ul style="list-style-type: none"> •Agricultural Waste •Auto hulks •Biomedical Wastes •Biosolids •Contaminated Soil •Free Liquids •Hazardous Waste •Industrial Waste •Large dead animals •PCBs •Waste on fire or smouldering •Waste not defined as MSW | <ul style="list-style-type: none"> •Corrugated cardboard •Glass containers •Mixed Waste Paper •Metal Containers •Plastic Packaging •Product Stewardship Material •Scrap Metal |

3 Tipping Fees

A tipping fee schedule has a multiple of purposes. Applying tipping fees to incoming waste is how TNRD and the City of Kamloops recover part of the costs of building and operating their solid waste facilities. In addition, through the application of variable rates to the different waste streams, TNRD and the City can influence the behaviour of their customers. For instance, lower rates on recyclable and compostable waste streams than the garbage rate encourages customers to source separate these materials so that their costs are lowered. This is already the case for both the City of Kamloops and the TNRD facility bylaws where commingled Demolition, Land Clearing and Construction Waste (DLC) is charged at \$160 per tonne while separated DLC materials such as clean wood waste and asphalt shingles are charged at \$100 per tonne.

Similarly, tipping fees can be set at a level that encourages waste generators to seek out lower-cost private sector alternatives, like a private recycling depot or scrap metal yard, which avoids TNRD or the City having to store and subsequently transport the material to the recycling facility. Another purpose for the tipping fee schedule is to track the quantities of the different categories of waste that are handled at the facilities. Having detailed information on the volumes and revenues associated with each waste stream is invaluable for planning purposes.



4 Disposal Bans

To encourage even more source-separation and diversion than variable tipping fees, many regional districts and municipalities implement disposal bans on recyclable and compostable materials. This is a low-cost policy tool used to signal to waste generators and waste collection companies that they are expected to separate and recycle/compost specific materials for which alternatives are readily available (e.g. cardboard, metal, yard waste). Disposal bans are enforced at the point of disposal (i.e. at transfer stations and landfills) through the application of significant surcharges on garbage found to contain banned materials. To ensure sustained success, disposal bans require the local government to work closely with ICI waste generators and particularly commercial waste haulers in the design, start up and on-going maintenance of this policy. The Regional District of Nanaimo, whose disposal ban on cardboard was implemented in 1992, has a consistent approach whenever they introduce a new disposal ban:

- I. **Regulate** (decide to ban a waste stream with a readily available alternative to landfilling)
- II. **Collaborate** (work with affected stakeholders to determine the timing of implementation and the ramp up of enforcement measures)
- III. **Educate** (make sure all haulers and waste generators are aware of the upcoming new disposal ban, and plan to communicate regularly)
- IV. **Enforce** (enforce the disposal ban at the point of disposal).

4.1 Approaches to Disposal Ban Enforcement

The approach to enforcing disposal bans has evolved over the last decade as regional districts have gained more experience with this policy tool. Enforcement is only one component of an integrated approach to implementing a disposal ban. As indicated in Figure 4-1, collaboration with waste haulers and generators is essential not only during the design of a disposal ban but also during implementation.

Many regional districts have discovered that the need to enforce a disposal ban is short-term and minimal if adequate collaboration with waste haulers, supported by effective education of waste generators, results in diversion becoming “business-as-usual”. In effect, waste haulers become the enforcers of the disposal ban since its implementation provides them with an opportunity to increase their market share if they can provide more cost-effective collection options to their customers.



Figure 4-1: Integrated Disposal Ban Design and Implementation



Nevertheless, local governments do need to provide some level of enforcement in order for the ban to be effective. With respect to disposal bans on cardboard, mixed waste paper and scrap metal, some local governments such as the Capital Regional District have dedicated bylaw enforcement officers at the landfill inspecting loads at the working face and issuing fines if required. In the Regional District of Nanaimo, bans are enforced at the landfill by the equipment operators who notify a supervisor to inspect the load, take pictures and then advise the scale clerk to apply a surcharge to the load. This information is then passed on the Zero Waste Compliance Officer who follows up with the hauler and generator to educate then on compliance options.

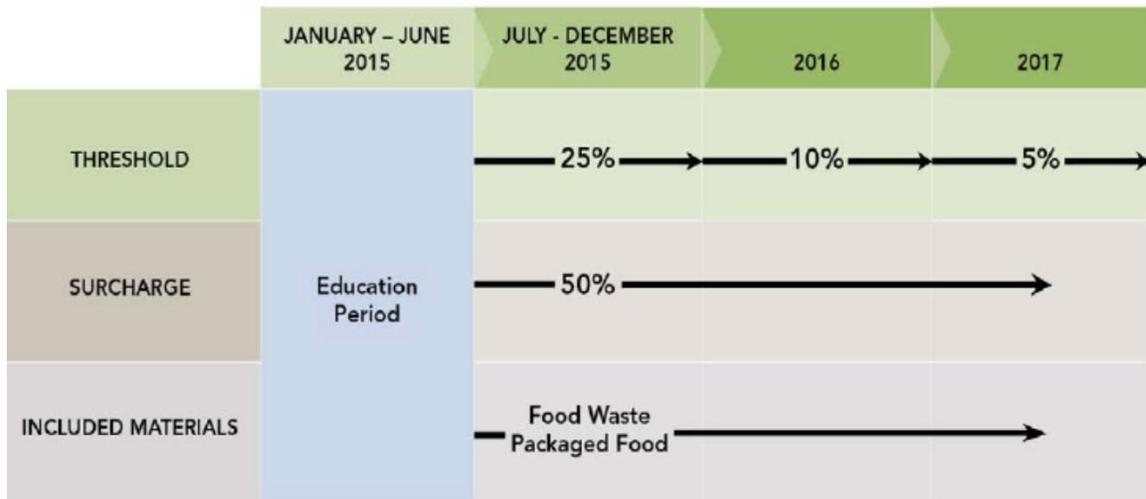
It is important to note that the goal of the surcharge is not to make money for the regional district but to provide an opportunity to educate. In most cases the first infraction results in a warning while the second infraction results in a tipping fee surcharge. However based on experience, most infractions occur within the first six to twelve months of ban implementation, after which fines are minimal as waste diversion becomes business as usual.

Metro Vancouver refined this approach with the introduction of their food scraps disposal ban in January 2015. From 2012-2013 Metro planned their organics diversion strategy in collaboration with stakeholders and then released their implementation strategy 2014. The strategy was based on a phased implementation approach as illustrated in Figure 4-2. Although the ban was effective January 2015, the first six months was considered as an education period with no surcharge on tipping fees. However from July to December 2015, if a hauler arrived with a load at a transfer station or disposal



facility containing more than 25% food scraps, a 50% surcharge was applied to their tipping fee. This 20% threshold was reduced to 10% in 2016 down to 5% in 2017.

Figure 4-2: Metro Vancouver Organics Disposal Ban Phased Implementation



Although Metro Vancouver hired contracted enforcement staff at their facilities to inspect incoming loads for food waste, most regional districts have used their own staff to enforce disposal bans on a wide range of materials. This is because, as discussed above, enforcement activity is usually short-term while waste generators and haulers adjust to new waste management behaviours.

Metro Vancouver’s phased approach was extremely successful and has been adopted by other regional districts as they introduce their own disposal bans. Most recently, in April 2017 the Regional District of Fraser-Fort George approved a commercial cardboard diversion program that will apply phased surcharges and thresholds to loads containing cardboard. This program will be implemented by regional staff.

5 Policies and Procedures

Solid waste management facilities are recipients of a wide variety of solid wastes, many of which can pose a health and safety risk to site staff or the environment if it is not properly identified and managed. Consequently, operating policies and procedures are prepared to guide staff and minimize the risks associated with managing solid waste. Typical waste streams that have a policy and procedure include:

- Asbestos and asbestos containing products
- Drywall/gypsum (due to the potential for containing asbestos and for creating hydrogen sulfide gas in landfills)
- Contaminated soil
- Sharps
- Medical facility waste



Currently, Although TNRD does have a policy and procedure for receiving and managing asbestos that this identified as such by the customer, it does not have a protocol in place for screening for waste that might contain asbestos. Many customers are unaware of the broad range of materials, particularly old building materials, which contain asbestos. It's recommended that the TNRD develop appropriate policies, procedures and practices for screening and managing waste with a high risk of containing asbestos, and to share this procedure with member municipalities operating solid waste facilities. Relevant examples of such policies and procedure can be obtained from other BC regional districts.

6 Waste Stream Management Licensing

The BC *Environmental Management Act* (the Act) grants the authority and responsibility to manage all municipal solid waste and recyclables to the province's regional districts. As part of this authority, under Section 24 of the Act, regional districts are responsible for developing and implementing solid waste management plans (SWMP) that provide long term visions for the management of municipal solid waste, including waste diversion and disposal activities.

For the purposes of implementing an approved SWMP, Section 25 of the Act contains provisions for the regulation of solid waste management facilities and haulers by regional districts. This tool can be used by regional districts, if they so choose, to regulate their local solid waste industry by achieving operational and administrative control over privately-owned and publicly-owned facilities and haulers managing recyclable material and municipal solid waste in their region.

The Act allows regional districts to create bylaws respecting the following:

- The types and quantities of waste materials managed at a site (*facilities*);
- The types and quantities of waste materials transported within the regional district (*haulers*);
- The operation, closure and post-closure of a waste management site;
- The fees and charges applied to waste management activities;
- The recording and submission of waste management information;
- The requirement to hold a license;
- The requirement to comply with a code of practice; and,
- The requirement for operators of sites to obtain risk insurance or provide some form of security.

In particular, the Act allows for the licensing system to establish different prohibitions, conditions, requirements, and exemptions for different classes of sites, operations, activities, waste or recyclables. This means that each license can be case specific.

Therefore, waste stream management licensing is another potential tool for TNRD to employ to assert control over the waste management system. This tool was identified in the TNRD's 2008 SWMP but not implemented as it wasn't considered a high priority action.

Licenses can be used to administer and enforce any bylaw developed by a regional district under the Act's authority. The Act provides for two types of licenses that a regional district can issue: a waste



stream management license (WSML) issued to the owner or operator of a site that accepts and manages municipal solid waste; and, a hauler license issued to a hauler.

Regional Districts may choose to regulate their local solid waste industry for the following reasons:

- To ensure the diversion of recyclable material;
- To prevent abandonment of large quantities of solid waste or recyclable material;
- To track the movement of municipal solid waste and recyclable material;
- To assist in determining success in meeting waste reduction goals;
- To establish minimum administrative and operational requirements for facilities;
- To encourage private sector investment in waste management (through the establishment of a level playing field); and,
- To protect the public interest by managing the flow of municipal solid waste to regional district facilities to ensure financial sustainability.

6.1 Examples of Regional Districts with Licensing Bylaws

Metro Vancouver (MV) introduced a regulatory program to ensure proper management of privately operated municipal solid waste and recycling facilities in their 1995 SWMP. These facilities are regulated by the Municipal Solid Waste and Recyclable Material Regulatory Bylaw which specifies operating requirements so as to protect the environment and public health, protect the region's land base in accordance with the host municipality's zoning and land use policies, ensure that regional, municipal and private facilities operate to equivalent standards, and to achieve the objectives of the MV Integrated Solid Waste and Resource Management Plan.

Under the Bylaw, licenses are required for the following types of privately owned facilities: disposal facilities; material recovery facilities, transfer stations, composting facilities, storage facilities and certain types of brokering facilities.

In another example, the Regional District of Nanaimo (RDN) and the Cowichan Valley Regional District (CVRD), working in partnership, adopted Waste Stream Management Licensing Bylaws No. 1386 (RDN) and 2570 (CVRD) in 2004. Under these bylaws, the RDN and the CVRD are authorized to license all private or non-government operated municipal solid waste diversion and recycling facilities within their respective regions.

The bylaws were established under the authority of both the RDN and CVRD SWMPs and were approved by the Ministry of Environment in 2005. The bylaws are a response to concerns by the recycling industry in both districts regarding competing businesses that operate with low standards. The photograph below shows one example of an undesirable operation competing with legitimate recycling operations prior to the establishment of a licensing system.



Pile of waste drywall being “stored” on private land in the CVRD

The bylaws create a level set of standards for the recycling and composting industry that protects private sector investment in local solid waste management infrastructure, and enhances diversion in the regions. They are also intended to shield taxpayers from the risk and expense related to clean-up of poorly operated and/or abandoned facilities. In both the RDN and the CVRD, the WSML bylaws help improve the quality of data received from private diversion and recycling facilities, as they are required to submit monthly material statements to the districts. Improved data reporting allows both the RDN and CVRD to effectively track progress towards their waste reduction goals.

In the three regional districts discussed above, the license application process includes a 45-day public consultation period for new applications. License applications are reviewed by staff; and if applications are acceptable, staff also issues the license. Any applicant or licensee affected by the staff decision may appeal the decision to the Board.

The three regional districts also operate their respective licensing systems on a self-financing basis, in that license application, amendment and annual administration fees have been designed to pay for the regulatory program. In Metro Vancouver the application fees range from \$500 to \$5,000 depending on the type of facility, with an annual administration fee of \$1,000 for all licensed facilities. In the RDN and CVRD system, license application fees range from \$100 to \$1,000 depending on the type of facility, with an annual administration fee of \$100 - \$500 depending on the type of facility.

WSMLs require staff time to review applications, inspect facilities and enforce license requirements. For the RDN in particular, staff time dedicated to the WSML bylaw, at 1 Full-time Equivalent (FTE) annually, exceeds the revenue generated by the system. However, the RDN reports that the documented diversion attributed to the WSML system has been worth the expense.

Nevertheless, as part of their SWMP Review, the RDN will be reviewing the fee structure contained in their WSML, to determine whether the fees should be adjusted to more accurately reflect costs.



6.2 Codes of Practice Bylaws

Code of Practice bylaws are another approach to facility regulation, that is similar to waste stream management licensing, but instead of licensing all solid waste management facilities, code of practice bylaws seek to establish operating standard *for a specific type* of solid waste facility. This is the approach the Capital Regional District (CRD) has undertaken with the development of the Composting Facilities bylaw and the Salt Spring Island Transfer Station bylaw.

This approach to facility regulation limits the authority to only those types of facilities that the CRD deemed necessary to assert some level of operating standards. As an example, the CRD implemented the *Salt Spring Island Transfer Station Regulation Bylaw 2810* in 2002. The purpose of the bylaw is to regulate and license the operation of facilities that are used for the management of municipal solid waste or recyclable material on Salt Spring Island (SSI). Under this bylaw, transfer stations must not contaminate ground or surface water or generate unacceptable levels of odour, vectors, litter or dust. This bylaw also requires performance security.

The bylaw was put in place to address the development of private sector transfer stations on Salt Spring Island to ensure that they met minimum desired operating standards and created a level playing field.

In summary, adoption of a waste stream management licensing or codes of practice bylaws could provide the TNRD are tools that can provide a level of local government control over the operation of private sector solid waste facilities, and can also be used to diminish the potential for facilities that operate at a low standard.

7 Extended Producer Responsibility (EPR)

Extended Producer Responsibility (EPR) is a provincial policy tool that aims to shift the responsibility for end-of-life management of products (physically and economically) to their manufacturer and retailers (called “producers”) and away from local governments. This policy is intended to create an incentive for producers to include environmental considerations in design of products. As a result of this policy tool, the following products, at the end of their life, are to be managed by their producers:

- beverage containers
- residential packaging and printed papers
- smoke and carbon monoxide alarms
- tires
- used oil, oil containers, oil filters
- antifreeze
- household batteries and cell phones
- lead acid batteries
- small appliances and electrical equipment
- electronics: computers, televisions, audio-visual, medical equipment, office equipment
- pharmaceuticals, outdoor power equipment
- lamps and lighting equipment



The 2007 TNRD Solid Waste Management Plan states in regards to EPR that TNRD will:

- Support the continuation and expansion of product stewardship programs implemented
- Support extended producer responsibility and Design-for-Environment initiatives that encourage or regulate manufacturers to use recyclable and recycled packaging materials and discourage excessive packaging
- Lobby senior levels of government to implement policy to expand extended producer responsibility programs within British Columbia and Canada, particularly those that focus on packaging waste
- Prepare an annual report to the upper levels of government, which will provide a “report card” like summary on all aspects of EPR pertaining to the TNRD, along with recommendations for improvement
- Continue to participate in the BC Product Stewardship Council, to provide input to the Ministry of Environment on how regional districts would wish to see stewardship programs developed in the province
- Until such time as provincially mandated programs are functioning effectively in the region, the TNRD will continue to support recycling events such as Household Hazardous Waste and E-Waste Collection events.

Since the development of the 2007 Plan, and as reported in the Stage 1 Report on the Existing Solid Waste Management System, EPR plays an increasingly significant role in how solid waste is managed in BC and in the TNRD. The following is an overview of the EPR collection services in the TNRD:

- 1) The TNRD collects several EPR products at their solid waste facilities on behalf of producers, i.e. the producers pay TNRD to provide collection services or cover the transportation and disposal costs. The following products are collected at all full-service sites: household batteries, automotive batteries, tires, motor oil and filters, electronics, small appliances, paints, pesticides, fuels and light bulbs. Some of these products are also collected at the residential service sites.
- 2) The City of Kamloops recently became a collector of residential packaging and printed papers for Recycle BC (formerly Multi-Material BC), which means that the City’s residential curbside and multi-family recycling collection programs are now a Recycle BC service rather than a City service, although City crews continue to provide the collection service.
- 3) There are several private bottle depots that collect beverage containers and electronics.
- 4) There are also private collection sites, often located at retailers, for various EPR-designated products.

Additionally, in recent months, the TNRD has begun discussions with Recycle BC in regards to collecting residential packaging and printed papers at TNRD solid waste facilities as part of the Recycle BC program.



The TNRD and the City of Kamloops has been working towards having “one stop drops”. However, there hasn’t been a formal policy adopted to guide the regional district or the City in how it determines whether or not to provide a collection service on behalf on an EPR program. As EPR becomes an increasingly significant component of BC’s waste management system, the TNRD and member municipalities may benefit from determining the extent that they wish to engage in EPR-related services.

In BC, three models of local participation appear to be emerging:

- i. Provide as broad a range of EPR drop off services at local solid waste facilities as possible (i.e. try to provide “one stop drops” -- the current approach by the TNRD and the City of Kamloops)
- ii. Minimize local government participation or do not participate in EPR programs directly
- iii. Hybrid: Participate in the collection of specific products and packaging based on some or all of the following:
 - o Available space and resources to manage the EPR program at local government facilities
 - o The current role of the local government in collecting the designated product/package
 - o The level of remuneration offered by EPR organizations for the collection service
 - o The presence of alternative service providers in the area (that may be impacted if another collection site is established).

The vast majority of local governments are opting for a hybrid approach but very few have a formal policy to assist staff with determining which EPR programs to engage with.

8 Recommendations for Consideration

Based on the above, the following recommendations associated with bylaws, policies and enforcement are provided for consideration:

1. Develop consistent definitions for TNRD and municipal solid waste bylaws.
2. Aim for consistent tipping fee structures and disposal bans for solid waste facilities in and around the City of Kamloops.
3. When implementing new disposal bans (or beginning to enforce existing bans), undertake an integrated implementation process of: regulate, collaborate, educate and enforce.
4. Establish and implement consistent approaches to disposal ban enforcement.
5. Collaborate to develop operational policies and procedures with an aim for consistency with how controlled wastes should be delivered to solid waste facilities.



6. Develop clear decision-making criteria for determining if, when and where to participate in EPR collection services.
7. Consider the need for waste stream management licensing or codes of practice bylaws once disposal bans and other diversion initiatives are in place.