

Part 3: Engagement

Extended Producer Responsibility in the Yukon: exploration and implementation considerations

2021



This document is Part 3 of the “Extended Producer Responsibility in the Yukon: exploration and implementation considerations” prepared by the Government of Yukon to fulfill the 2018 recommendation by the Ministerial Committee on Solid Waste to explore Extended Producer Responsibility. Part 3 covers the details of the engagement with select stakeholders and the feedback received.

Exploring EPR – What we heard

The Government of Yukon undertook this EPR exploration exercise in the summer and fall of 2020. A list of stakeholders relevant to EPR in the Yukon included PROs, government regulators, stewardship agencies, Yukon municipalities, Yukon recycling processors and industry experts (see Appendix A for the full list). Appendix B provides a summary of feedback received.

These stakeholders were contacted and asked to either respond to a survey document or participate in a remote video discussion between June and October 2020. Participants received a list of questions in advance, tailored to each stakeholder group, to allow them to prepare for the engagement.

The feedback received proved to be fairly consistent, suggesting a general agreement among stakeholders – at least about key issues. Highlights of this feedback are summarized below:

EPR basics

Stakeholders were clear that EPR system details for a new jurisdiction are typically established only in response to a regulation. This clarified that regulation is necessary to obligate producers to be part of EPR systems and begin discussions regarding program development and setting targets for recycling and service levels.

Product Care, a PRO operating in nine Canadian jurisdictions administering EPR programs for paints, solvents and lighting products, indicated that they are not seeking to expand their operations voluntarily but would require a regulation to obligate producers.

What does it mean for the Yukon?

- The Government of Yukon must commit to developing EPR regulations before producers participate in, and develop service and costing details for, EPR programs.

Although, aspirationally, EPR results in the environmental redesign of products, stakeholders reported that EPR has not been directly linked to product redesign due to the small Canadian market share. This is further supported by research¹.

EPR regulation

Discussions with producers and PROs indicated that BC's EPR regulation is the most extensive in Canada, and believed by many to be the most effective. Ontario's IPR framework was seen as having some challenges, such as excessive administrative burden, and was received more hesitantly by stakeholders.

In terms of EPR regulatory characteristics, it was clearly stated that a key design element is outcomes-based regulation focused on performance, rather than prescriptive regulation. It was suggested that an outcomes-based approach encourages innovation by allowing flexibility of how outcomes are achieved. This also allows for industry

¹ RRS, "Impact of EPR for PPP on Packaging Design," (2020).

(producers) to outperform targets, if possible. Essentially, the goal is for the private sector to compete to provide the most efficient service, versus choosing winners and losers. It was also noted that strong guidance and oversight is needed to accompany regulation in order to provide clarity of expected outcomes.

It is very important that the regulation creates a level playing field, where all producers are expected to meet or exceed the same targets. This includes challenging realities such as online sales that must be encompassed in compliance.

The main elements of the regulation that were identified as of high importance to the stakeholders included:

- a) **Definitions of obligated producers**, including a cascading definition of “a producer” and definition of a “small producer” that may be exempted from obligations (*de minimis* thresholds).
- b) **Definitions of obligated products**, which should have the ability to evolve as products change (e.g., electronics – VCRs become DVRs, etc.).
- c) **Definitions of desired outcomes and corresponding targets**. It was suggested that primary targets include service accessibility targets and material recovery targets. It was noted that it is important that targets do not produce unintended consequences that could be at odds with desired outcomes (e.g., weight-based targets may conflict with lightweighting of packaging).

Anticipating future regulatory elements was also flagged (e.g., electric vehicle batteries), as was the potential for conflict between policy intention and legal reality.

It was also suggested the regulation and/or associated guidance could address:

- expected public communications;
- reporting requirements (noted that measurement needs to be reasonable and consistent with desired outcomes);
- communications with regulators and expectations around reporting results; and

- acceptable methods of end-of-life management of the collected products, especially clear guidance on if options such as waste-to-energy and incineration are acceptable.

National consistency was seen by stakeholders as desirable, although several reflected that it is not entirely realistic. Harmonizing important elements of the regulation, however, was considered crucial to allow existing PROs to successfully expand their operations to the Yukon.

RecycleBC, a BC-based PRO operating EPR program for PPP materials and representing over 1,100 producers, recommended harmonizing the definition of the producer and a basket of obligated products.

There was general consensus that extensive consultation is key to successfully introducing an EPR system. Getting producers involved in this process was identified as very important.

Fees

There were mixed thoughts on whether visible fees (shown separately on a sale receipt) or producer/member funding (incorporated into the price of a product) is more appropriate. It was noted that, if left to the producers, they will choose the best mechanism for their products and customers. It was also stated that producers typically prefer visible fees, which are seen as an educational opportunity.

Fees are usually determined considering the overall costs of the program and number of units marketed. This formula can be difficult to determine initially and needs to be reviewed and adjusted regularly. Some PROs reported a robust fee-setting methodology including periodic fee reviews.

A general principle is that there should be no cross-subsidization between materials or product categories even within an obligated basket of products. This prevents readily recyclable materials subsidizing less recyclable ones, thereby reducing the incentive to move away from products that are challenging to manage at end-of-life. PROs also generally accept that legacy products will be accepted in the EPR system.

What does it mean for the Yukon?

- EPR costs typically incorporated into the price of the product, especially for PPP materials, are not expected to increase the cost of products in the Yukon. Producers have already incorporated them into product costs because many southern jurisdictions already have EPR programs.
- Cross subsidization is a problematic, but a common practice in the current Recycling Fund. An EPR system would ensure fair cost allocations between product categories.

ICI (Industrial, Commercial, Institutional)

There were mixed opinions on the desirability of including the ICI sector in EPR regulation for PPP. Specifically, it was suggested that it would likely be challenging to include ICI sector, since all PPP EPR programs in Canada currently do not. However, it was noted that EU Regulations can provide good direction on incorporating ICI. In the Yukon's case, it was also suggested that the inclusion of ICI sector in the PPP programs may provide enhanced economies of scale.

What does it mean for the Yukon?

- Obligations of the ICI sector in Yukon will require further consultation with stakeholders, especially for the PPP materials.

Compliance

PROs are financially motivated to identify producers who should be registered and promote voluntary compliance as the first step before passing the difficult cases to the regulator.

It was suggested the regulator needs to be prepared and have the resources to enforce compliance of producers. This is because, to be successful, an EPR regulation needs oversight – from either government or an arms-length organization. Government may rely on third-party audits to confirm compliance such as third-party assurance for material fate (program performance audits) as well as accounting (financial audits) requirements, as is the case in BC.

Compliance efforts by the PROs will often be focused on “free riders.” Industry has worked hard to ensure that those who are not paying for the system are identified to ensure they are contributing their fair share.

Successful compliance by PROs also needs clear targets and key performance indicators set out by the EPR regulation and associated guidance.

It was noted that reputation plays a large part in compliance, and that having the Regulator publicly publish noncompliance lists may be more effective than instruments like fines.

Ultimate end-of-life management is key to environmental performance, so it must be tracked and reported. However, it was noted that tracking of materials to an end state can be challenging.

Remote communities

Servicing remote communities comes with challenges, but it still needs to be a requirement to offer reasonable and free access.

Accessibility standards are included in some regulations or program plans. Thresholds for service may include population minimums or the drive time to a collection location. For example, the BC Used Oil Management Association (BCUOMA) has different incentive rates by zones to encourage collectors to service more remote regions, while the First Nations Recycling Initiative operated collaboratively by BC PROs has a separate structure and associated fees to service First Nations communities.

Innovation is emerging and offers more opportunities for underserved communities through alternate collection approaches such as:

- a) mail-in service;
- b) supplementary depots (e.g., SeaCans), staffed or unstaffed; or
- c) collection days.

There is also an opportunity for PROs to collaborate on providing services to remote communities. The Yukon already has a successful history of collaborating with other organizations to administer stewardship programs for tires, electronics and small electrical appliances. The current government-operated HHW collection efforts also have experience working with depots and managing public drop-off logistics.

What does it mean for the Yukon?

- The Yukon will need to carefully research and consider how to manage required service levels in remote communities.

Yukon EPR specifics

Those consulted had some specific suggestions for the Yukon in pursuing EPR.

- Harmonize product categories and definitions, ideally on a national basis.
- While those consulted were supportive of collaboration on EPR for the Yukon, it was suggested that performance metrics on targets such as accessibility may need to be different for the territory.

- There was consensus that it makes sense for multiple PROs to collaborate to consolidate collection, handling, and transportation. At the same time, PROs will need information on population centres, current infrastructure, and transportation routes in order to determine suitable program development. This report provides much of this information in Appendix A.
- The level playing field concept, with all producers expected to adhere to the same results, was reinforced as a critical element. Non-compliance has a significant impact to revenues and services. Again, it was reinforced that online sales must be included, particularly as they represent a significant component of total sales in the north.
- PROs were generally supportive of the concept of collaborating to bring EPR to Yukon. However, they were clear that they would require regulation details before determining their ability to potentially expand into the territory. PROs who were positive about the potential to operate in Yukon suggested it would take six months - two years from regulation to implementation of a program.

Materials to include

Stakeholders had opinions around which materials make the most sense to incorporate into EPR regulations in the Yukon as a priority. It was suggested that factors such as volume, cost and toxicity are key considerations in this decision. BC, for example, was guided by landfill impacts, material toxicity, and the CCME CAP-EPR priority listing of materials.

For PPP, it was recommended that the Yukon assume the same list of PPP products as Recycle BC. For batteries, it was suggested to include them all, rather than differentiating by chemistry or size.

End-of-life mining equipment was also mentioned as a territory-specific category that could be captured under EPR.

Yukon municipalities identified hazardous/special waste, PPP, metal and existing stewardship materials (tires, electronics) as priority EPR materials.

Input from municipalities and recycling processors

Municipalities who responded to the consultation had varying levels of knowledge and opinions on EPR. There were many questions on what the regulations and programs would look like, impact on municipalities and municipal role in an EPR system. Effects on other stakeholders, such as local waste haulers, and existing programs were also questioned. Municipalities recognized the role that existing recycling processors play in handling PPP materials.

Municipalities wanted to maintain public drop-off access for PPP while enhancing service level for other materials (including from the ICI sector). The potential role for local businesses and desire to build on local infrastructure and municipal systems was also noted.

Processor input flagged the current lack of infrastructure for an effective collection system. These challenges, combined with a lack of capacity, are leading to processors potentially discontinuing acceptance of residential PPP under the current waste management framework.



Appendix A: List of Stakeholders



Appendix A: Exploration of Extended Producer Responsibility (EPR) in the Yukon - List of Stakeholders

Guest name	Role	Organization	Type
Bob McDonald	Director, Extended Producer Responsibility	BC Ministry of Environmental and Climate Change Strategy	Government
Meegan Armstrong	Unit Head, Industry Products Stewardship	BC Ministry of Environment and Climate Change	Government
Teresa Conner	Unit Head, Extended Producer Responsibility	BC Ministry of Environment and Climate Change	Government
Kristi MacMillan	Senior Policy Analyst, Extended Producer Responsibility	BC Ministry of Environment and Climate Change	Government
Pat Kane	Director, Waste Policy Section	Alberta Environment and Parks	Government
Scott Nicol	Senior Waste Policy Advisor, Waste Policy Section	Alberta Environment and Parks	Government
Dave Lefebvre	Director, Public Affairs	Recycle BC & CSSA (Canadian Stewardship Services Alliances)	PRO / Steward support organization
Mark Kurschner	President	Product Care	PRO
Mannie Cheung	VP of Operations	Product Care	PRO
Colin McKean	Executive Director	Canadian Battery Association	PRO
Rosemary Sutton	Executive Director	Tire Stewardship BC	PRO
David Lawes	Executive Director	BCUOMA	PRO
Michael Zarbl	Executive Director	MARR - Major Appliance Recycling Roundtable	PRO
Joy Snyder	Executive Director	Reven Recycling/Zero Waste Yukon	Processor
Pst McInroy		P&M Recycling	Processor
Allen Langdon	President and CEO	Encore/Return-it	PRO
Brad Schultz		ARMA - Alberta Recycling Management Authority	Steward
Ed Gugenheimer	CEO	ARMA - Alberta Recycling Management Authority	Steward
Jay Illingworth	Director, Harmonization	EPRA - Electronics Products Recycling Association	Steward/PRO
Lynda Kitamura		EPRA - Electronics Products Recycling Association	Steward/PRO
Shelagh Kerr	President & CEO	EPSC - Electronics Products Stewardship Contact	Industry Group
No contact identified		OPEIC - Outdoor Power Equipment Institute of Canada	Steward/PRO
Shane Hedderson	Western Region Business Manager	Cleanfarms Inc.	PRO
Arcadio Rodriguez	Acting Manager Water and Waste	City of Whitehorse	Municipality
Mark Dauphinee	Public Works Manager	City of Dawson	Municipality
Dan Rodin	CAO Village of Haines Junction	Village of Haines Junction	Municipality
Collin Kallio (Secondary Contact for VOHJ)	Public Works Lead Hand (landfill operator)	Village of Haines Junction	Municipality
Cam Lockwood	CAO Town of Watson Lake	Town of Watson Lake	Municipality
Chris Evans	Manager, Environmental Affairs (member of the EPR Exploration Team)	Community Affairs, Department of Community Services	Municipality (Government acting in Municipal Capacity)
Shelley Hassard	Title ? (Landfill Permit Holder)	Village of Teslin	Municipality
Margrit Wozniak	CAO Village of Mayo	Village of Mayo	Municipality
John Thomas	CAO Town of Faro	Town of Faro	Municipality
Tracey Thomas	CAO Village of Carmacks	Village of Carmacks	Municipality
Cole Hunking	Title ? (Landfill Operator)	Village of Teslin	Municipality



Appendix B: Stakeholder Feedback



Organization	EPRA	EPSC	CSSA / Recycle BC / MMS Western	Canadian Battery Association	Product Care	Cleanfarms	BCUOMA	TSBC	MARR	MMBC / Cncorp
Contact	Lynda Kitamura	Shelagh Kerr	David Lefebvre	Colin McKean	Mannie Cheung	Barry Friesen	David Lawes	Rosemary Sutton	Michael Zarbl	Allen Langdon
How was your stewardship agency formed?	Formed by Retail Council and EPSC	Set up in 2004 by OEMs with intent to be voluntary program. Determined backdrop regulation was necessary to ensure level playing field. First global organization to set up a recycling standard – now US certified standard. Concerned about potential legal implications. EH&S standards adhered. Engaged in packaging and batteries.	PRO always formed in response to a regulation – need to know what responding to. CSSA brought together resources and stewards to respond to regulation. Recycle BC became PRO. CSSA supports every PPP PRO except QC (EEQ). Stewards want harmonization (big picture principles – recognize each jurisdiction is different. Need expertise around fee setting.)	Industry Association Helps members meet different EPR regulations in Canada.	1994 – first paint PRO in North America Formed by industry coming together to meet BC regulation. In beginning, a few companies went on their own – came together at the end.	Originally formed in 1989 to address the collection and disposal of empty pesticide containers. The program was run voluntarily by the crop protection industry group CropLife Canada. In 2009, Cleanfarms was incorporated and the program was transferred from CropLife to Cleanfarms with the mandate to address all agricultural waste products. Operates both voluntary and regulated EPR programs.	2003 – industry board. Also non-industry members – good element – in place of advisory council. Collect money from producers to run program and desire stakeholder input. Focus on outcomes – accessibility, collection rates, etc. Board really enforces performance. Processors not members – would be a conflict. Have regular meetings with processors.	The member organizations that form TSBC, except for one, were already part of the government tire program advisory committee. Those 3 members (TRAC, WCTDA, RCC) formed TSBC in 2003 as industry was keen to have the tire program become an industry program versus a government program. It lobbied the Ministry of Environment for change, which eventually occurred in March 30, 2006 when tires were added to the Recycling Regulation. New Car Dealers became a member in 2007 when the program officially launched. The four members represent the majority of tire retailers in the province of BC.	BC government included major appliances in regulation. MARR was formed as a result. Formed with RCC and AHAM (Association of Home Appliance Manufacturers). Big retailers pay fees directly to MARR.	MMBC formed a PRO from trade association to be able to respond to government regulation. Encorp – slow evolution of informal network of bottlers and retailers
What materials does your organization handle?	Small appliances through consumer electronics. Varies by province.	Electronics	All packaging, however no solution for multi-laminated. Now includes single use items – some (e.g., paper plates) were already captured. New: stir sticks, straws, cutlery, zip-loc bags. Largest list of materials in Canada.	Strictly lead batteries of all shapes and sizes	Paint In 1997 added solvents and flammable liquids and pesticides - second PRO formed. Then joined again. In 2010 regulation added smoke alarms, lights – lighting and smoke alarms industry joined product care. Became a federal non-profit to be able to deal with programs across the country. Helped set up electronics program in SK. Provide management services for other PROs. Also some experience in U.S.	Currently have five permanent programs that collect and recycle/dispose of: - Empty commercial pesticide and fertilizer containers under 23 litres - Empty commercial pesticide and fertilizer containers over 23 litres - Empty commercial seed and pesticide bags - Obsolete pesticide and animal health products - Grain bags	Oil, filters, containers, antifreeze and containers. Adding all automotive containers, e.g. DEF. Suggest same broad scope for all programs.	Tires off the following vehicle types: Passenger, small RV, light truck, motorcycle, turf and all terrain vehicle, forklift, small utility, RV trailer tires, bobcat/skid steer, agricultural (small, medium, large), medium truck, logger/skidder Important to note that at the time these tires were added to the Regulation there was no viable solution for the other tire types. This now exists but despite requests from TSBC to the Ministry to add them to the Regulation, the Ministry's response remains no. We believe this to be a matter of lack of resourcing and other pressing priorities.	All large appliances (17 categories), include dehumidifiers, refrigerators, washing machines, electric beverage dispensers, dishwashers, food waste disposers, freezers, air conditioners, microwaves, ranges, ovens, clothes dryers, garbarators, etc.	All sealed beverage containers except aluminum alcohol container, beer containers, milk. Also accept textiles - 21 sorts (lacks practicality). Prefer only 3 sorts.
How many producers are members of your organization?	Just over 7000. Regulation needs to define producer well. Needs to capture all responsibility. Critical to capture all relevant organizations. Avoid loopholes (e.g., Ali Baba). Need ability to obligate anyone. YK regulation is well defined. As best practice BC's regulation is well defined.		1100 – 1200. De-minimus 1000 kg or \$1,000,000 revenue. Base rates for those just above de-minimus – then graduated rates. Not worth chasing all the smaller producers.	Represent about 95% of all lead sales in Canada	600 - 1000	Currently about 70	550 producers across country – 230 first sellers signed up in BC. Compliance is national.	TSBC has four members. Does not use the term "member" to describe the parties obligated under the Regulation – for tires this would be a person or business that sells program tires or equipment with program tires. However, the number of obligated parties is around 2,000.	Manufacturers of major appliances.	3 sources of revenue: 1. Unredeemed deposits 2. Material value 3. CRFs (1 – 15 cents). Specific funds for different materials. CRFs calculated every year.
How do you establish fees that are charged on or for products?	Cost to run program and need a reserve for buffer. Producers see visible fee as education tool.	Smaller companies tend to internalize. Larger have transparent fees.	Robust fee-setting methodology. Supplied volume combined with program costs – redistribution of costs based on volume and type of materials. 90% of costs borne by 10% of stewards. No cross-subsidization between materials.	Lead batteries have a manufacturers core charge that ensures value at end of life. The core charge is \$18/automotive battery. The core charge ensures a recovery rate of virtually 100%. Still some recovery challenges in northern communities. (Work in northern Manitoba on ice roads would be of interest to the Yukon) Note that a manufacturers core charge is different that a PROs EHF or Deposit Refund.	Hard to predict returns. Budgeting exercise divides expenses by unit to charge producers. Avoid cross-subsidization between products or jurisdictions. Charge determined by products. Members prefer visible fees but prohibited in QC and NB.	Each product must have fees that maintain self sufficiency (e.g., no product can subsidize the costs of another product). Fees are established by determining the total costs of a product and dividing it by the number of units of that material put into the market. Calculations completed yearly.	Fees intended to cover program costs, but not entirely accurate. Working towards harmonization.	Initial government program: \$3/tire (regardless if in the program or not) TSBC: established a tiered rate depending on tire size. Also, increased fees since government program was underfunded. Therefore, the fees were set as follows effective Jan 1 2007: PLTs \$4 – changed to \$5 in 2008 as the program remained underfunded MTs \$9 – the true cost of recycling these tires is much more but it was determined that the fee should be more in line with programs across Canada. AG \$15 LS \$35 The rates have not changed since 2008.	Fees have evolved by trial and error – started with an estimate. Now closer to actual cost. 180 collectors in BC. Pay \$4 for collection plus ODS gas extraction fee.	N/A
Does your organization incentivize environmental design improvements to included products?	No. Electronics are global products and the Canadian market is very small (2%). Attempted mechanisms just add cost. Industry is constantly improving.	No - does not think EPR is the right tool for incentivizing environmental design of electronics.	Somewhat	No. That is left to the manufacturers.	Does not think EPR is not right tool to encourage environmental design. Local regulations don't have the influence to do that. Would have to be higher level.	Yes	Target hierarchy. Carbon incentives through other programs. Largest refinery in NW. Target of 50% rerefined. Space heating allowed but not paid incentive. Track sales and recovery.	No	Not really – same fee. Tracking costs based on different products. May consider different fees in future.	No. Pouches and wine in a box only products with issues.

Organization	EPRA	EPSC	CSSA / Recycle BC / MMS Western	Canadian Battery Association	Product Care	Cleanfarms	BCUOMA	TSBC	MARR	MMBC / Cncorp
If yes, what mechanism is used?			Attempts to move materials up hierarchy. Working on material cost differentiation. No eco-modulation. All materials charged based on actual costs.			First, by virtue of the fact that there are fees and that each product must pay its own way. Second, fees modulated for similar products – e.g., seed treatment containers have higher fees than non-seed treatment containers due to associated disposal costs. Because of this, the industry is looking at options to redesign the packages for better recycling.				
How would you suggest programs are best able to accomplish this?			EPR itself encourages environmental considerations.			1. Make the industry pay for things; 2. Don't let one industry subsidize another; and, 3. Don't create a government agency to collect and dispose of products. If you do so, there will be no incentive to do anything. Further, there will be no opportunity for economies of scale to work with other provinces.	Aspirational goal. Real outcome is to operate program efficiently. Fees also influence uses. Have differential incentives on containers and filters. Not on oil – covered in carbon incentives.	TSBC's ability to influence product design to increase recyclability is extremely limited. While an accepted and theoretically possible outcome in some industries, automotive tires are not simple consumer commodities. Instead, they are a critical element in the safe operation of motor vehicles. For this reason, the design and operating parameters of tires are mandated by federal regulation and international agreement. The things that make a tire "safe" also tend to be those that make it difficult to recycle. That said, the international tire manufacturers are responding to the environmental challenges of tire manufacturing by doing such things as replacing high aromatic petroleum-based oils with bio-based oils from corn, canola, oranges, etc. In addition, manufacturers are beginning to incorporate recycled rubber into selected tire types and are actively investing in new sources of natural rubber supply such as guayule and Russian Dandelion, which can be produced in North America.		Looking at pilots for environmental advances. Platform to encourage innovation.
How do you manage to provide a consistent level of service to remote communities?	Seems Yukon is fairly successful. Collaborate with other programs.		Accessibility 98.6% based on within 45 minutes of service. Network of depots. Respect local service providers.	This is an important issue and our work in Manitoba is transferable to other Provinces and Territories.	A challenge to any program. Need to balance with economics. Needs partnership w/ local government, province and PROs. Regulations need to be flexible to allow programs like this to work. Examples include St. Theresa Point (MB), Bella Bella (BC).	Only work as far north as Peace River regions in Alberta and some northern areas in Quebec. Costs are higher but the program manages it. Doing so in sparsely populated areas may require partnering with local municipalities.	Incentive rates by zone – drives collection in more remote areas. Change rates as required to ensure – review every couple of years. Have First Nations program – separate structure and fees. Define needs and help with infrastructure. Potential to use SeaCans and tailor program to each community.	Not all stewardship agencies can provide the same level of service due to the product type. Collection events have been used as a tool but unless you have a consistent event, (e.g., twice a year as an example) and multi products, these events are a challenge and become very costly. Some agencies take the position that if you cannot buy the product in your community then a collection option is not feasible and would ask the resident to drive to the nearest major centre for disposal. Potential for disposal options to follow non stewardship products guidelines for services in remote communities such as post offices, schools, ambulance etc.	Go anywhere to get products. For example, completed a cleanup in Atlin, BC and it was very expensive.	Launched Express & Go containers – SeaCan drop-off centres. 5 right now – Tofino, Big White, SFU. Plan to use more in rural sites, malls, urban as demand. Made to be self-serve.
If Yukon establishes EPR regulation, would your PRO be interested in operating in the territory?			Yes – need to understand regulatory framework. Harmonized approach would be preferred. Full responsibility best.	Our Producers sell into the Yukon, so we already work with retailers to recover the lead batteries on a voluntary basis. EPR regulation is necessary to move beyond voluntary and tackle the remote communities.	Depends on products. Yes for special wastes they currently handle.	Yes - Cleanfarms mandate.	Yes – very interested. ARMA may also be an option. Alberta may make more logistical sense. But BCUOMA can still coordinate.	Need Board review.	Possibly. Producers feel there is no reason to have EPR for major appliances. Interested in helping Yukon improve management w/o EPR (outreach, technical details, program management, etc).	Yes – great brand and system

Organization	EPRA	EPSC	CSSA / Recycle BC / MMS Western	Canadian Battery Association	Product Care	Cleanfarms	BCUOMA	TSBC	MARR	MMBC / Cncorp
How does your PRO assess potential expansion into a new jurisdiction? What information do you require to make this assessment? What are the primary challenges from the PRO's perspective to expand into a new jurisdiction?			Would prefer to know regulatory details. Common basket of materials across territory and harmonized with other jurisdictions. Makes sense for Yukon to harmonize with BC on materials, outside of single-use. Very interested in working with Yukon on the regulation.	The manufacturers and distributors that we represent are already recovering lead batteries in the Yukon.	Regulation required. Does it add value?	This requires a lot of study, piloting and logistics.	Regulation is the trigger. Need at least an indication of regulation.	Regulation is the trigger. Need at least an indication of regulation.		Proximity, materials, expertise, are they best positioned?
What aspects of existing EPR/ stewardship regulations do you find effective?	Obligated products need to be in reg – needs clarity of who is regulated. Allow for flexibility as products evolve. Better answered by industry organizations.	Outcomes-based. National approach – level playing field. Most provinces have presence of OEMs. Makes easier to move into EPR. Accessibility targets – measure how far (distance or time) from depots. Needs to be rational for region. Collection events OK. Small items can be mailed back.	All about targets and outcomes. Flexible on how they are achieved. Collaboration and no surprises approach.	BC and MB results-based models are the best.	Fair playing field – control free riders. Performance based rather than prescriptive. Flexibility in meeting outcomes.	EPR regulations should require stewards to address the following key elements: - Clear definition of the product regulated for EPR - Accessibility targets - Recovery targets - Financing scheme - Method of end-of-life management - Communications and reporting results These elements should be required to be in a plan submitted to the Minister for approval. The regulation should require full industry responsibility – industry-led and industry-run. The Ministry should do the monitoring and accepting/approving annual reports.	Outcomes-based. Definition of product type – use national definitions. Producer definition – obligated party (use BC). Environmental cooperation agreement with Yukon – perhaps allow for adoption of BC regulation? Recycling and collection targets. Accessibility.	In BC specifically, the ability for industry to manage the program and for the Ministry to be primarily interested in outcomes. And the flexibility for a Producer to be defined based on the product. For example in tires the Producer is defined as the retailer – we had to fight for this otherwise we would have had a situation like OTS, which no-one wants.	BC model – let producers run it. Believes in letting private sector compete versus choosing winners and losers.	Outcome-based regulation. Third party assurance – material fate as well as accounting. Level playing field (online big deal for Recycle BC). Allow for innovation.
What aspects of existing EPR/ stewardship regulations do you think could be improved?	Limit reporting burden.	Weight-based targets (products being lightweighted). Should capture weight, but not use it for targets. Cost should never be forgotten.	Scope creep – e.g., changing rules partway through program plan. Living program plan that can change and requires updates – lack of stability. Municipal bans not effective.	Clear roles and responsibilities of consumers, producers and government.	Prescriptive regulations don't work. Policy - based not always practical. Oversight organization.		Program plans may be obsolete. Too complicated. Alternative would be set targets and require adherence.	Add the requirement for a Non Financial Audit to the Regulation. This audit is excellent for both the steward and the Ministry. Be specific about Plan renewals and require the steward to submit the Plan renewal 3 to 6 months prior to the current Plan expiring. The Regulation also states the steward does not have to submit a Plan at renewal time but in fact can just advise the Director in writing that there will be no changes. This is really not accurate. Not so much the Regulation but in fairness to all stewards that fall under the Regulation would be that the Ministry deals with non-compliant stewards directly and not try to make changes or issue policies for all when the non-compliance issue is really only related to a few stewards.	ICI talk – big mistake to include. Factory in Quebec that recovers additional materials from appliances – but very expensive.	Too prescriptive
Which aspects of EPR regulations would be crucial to have aligned between Yukon and BC if the jurisdictions wanted to harmonize?			Basket of goods. National harmonization is important.	Harmonized product categories. Linkage to BC and Alberta is critical as most stewarded products will be transported to Edmonton and then distributed from there.	In an ideal world, harmonize across jurisdictions. However, performance metrics may need to be different.			Almost all of it to minimize the impacts on program governance and administration. Most critical is definition of obligated party.		Definition of producers, materials, align schedules, recovery rate

Organization	EPRA	EPSC	CSSA / Recycle BC / MMS Western	Canadian Battery Association	Product Care	Cleanfarms	BCUOMA	TSBC	MARR	MMBC / Cncorp
What are the primary challenges from the PRO's perspective to expand into a new jurisdiction?										Negotiating business relationships. Getting processors and transporters onside.
Has your organization ever worked with another stewardship agency or a Producer Responsibility Organization (PRO) to consolidate product collection, handling and transportation?	ENCORP in BC – contract to collect electronics.		First Nations Recycling Initiative – PROs across BC. Huge success.	Yes, the Manitoba Winter Road program is an example of PROs working together to provide accessibility to the north. It is a great model of cooperation between the community and PROs.	In MB, worked with other PROs to service remote communities using ice roads. St Theresa Point. Bella Bella – challenge with permitted haulers (water).	No... but have some of the same contractors as the used oil container programs.	Used to with First Nations, but not anymore, as product very different.	Just once, when our recycler took all of Yukon's tires in one year. But this stopped as it was cost prohibitive.	Part of First Nations initiative. Also member of Indigenous Zero Waste Technical Advisory Group (IZWTAG) – currently BC-based, but may be expanding nationally. Field service person who reaches out to communities.	Work with other PROs quite a bit. Also work for other PROs as service provider/partner.
Does this kind of collaboration make sense, particularly in a remote areas like Yukon?	Makes lots of sense for efficiency. Can work with municipalities.		Absolutely mobile depots, seasonal collection, etc.	It is the only option for remote communities.				Yes. Typically, recyclers fare better when they are handling larger volumes of raw material.		Yes, definitely.
How does your organization consider and work with local reuse/recycling systems?	Negotiate with local service providers (e.g., municipalities). Approach local depots.		Provide options to local governments who have programs. Try not to unduly impact local businesses.	We use all recycling systems including Return to Retail, depots and metal recyclers. They all have a roles.	Want to make sure system is efficient. Partner with existing systems where possible (e.g., SARCAN). Adapt to partner. Work with local governments.		Do direct engagement in community to understand needs. One on one contact key.	TSBC has agreements with its processors and manufacturers. Haulers do not have any direct relationship with TSBC. That arrangement is between the hauler and the processor.	In BC, MARR works directly with metal recyclers. Help manage a system that already exists. Already a metal supply chain. Metal value still covers most of operating costs for municipalities. MARR pays to extract ODS gas. Retailers normally haul old appliances away.	Find appropriate business arrangements
How does your organization assess infrastructure needs? What infrastructure is expected to be required in a jurisdiction like Yukon?	Need to know where the majority of the population is and determine where collection is needed. Already set up in Yukon.			Hazardous waste and Dangerous Goods requirements will dictate the requirements. Not familiar with Yukon's HW regulations, but there needs to be flexibility to provide storage and transportation from remote communities. For example, BC's HW regulation prevents PROs from transporting HW from remote communities efficiently.	Depends on product. How easy is it to move material? How far does it need to be shipped? Consider return-to-retail. Partner with other products to maximize use of infrastructure.	Need to complete certain tasks first, such as a waste characterization study, infrastructure assessment, collection system needs etc. This will help determine the waste stream (type and volume).		1. List of who your obligated parties (Retailers) are 2. Staff and start up funding in place prior to program launch. 3. Software to handle revenue and claims – don't build your own. We finally have an ecommerce solution for revenue and it has been wonderful and very useful for our retailers. Our claims system is about to be integrated into our revenue system getting us to the one window approach. Our software can be used by just paying a simple user fee. 4. Compliance process in place at the start – it may not seem important but non filers can build up and the chase is costly and time consuming 5. A retailer education program – right from the start 6. A consumer education program 7. Program policies – these guide your program and if established up front can prevent headaches down the road		Try to use existing infrastructure where possible, rather than reinventing.

Organization	EPRA	EPSC	CSSA / Recycle BC / MMS Western	Canadian Battery Association	Product Care	Cleanfarms	BCUOMA	TSBC	MARR	MMBC / Cncorp
How long would it take for your organization to establish a program in Yukon after an EPR regulation is introduced?	Generally at least a year. Could be more. Depends on realities.		Depends on regulation.	6 months	Typically 1-2 years. Involve industry in writing regulation.	We manage non-organic agricultural waste. Not knowing what the types and volumes of that waste in the Yukon means it is difficult to put a figure on it. A general rule of thumb is to have 18 to 36 months lead time from the passing of a regulation to the final launch of a program. But...that makes a lot of assumptions. Are there a lot of legacy materials to address? Who pays for legacy? Is there infrastructure? Are there recycling facilities? Etc etc.	Transition period of 6 months. 2 years to be full program.	Very hard to predict as very often the bottleneck is government approvals and / or obligated party buy in. I believe the Ministry in BC would expect an agency to be up and running within two years of adding a product to the Regulation.		6-12 months.
What materials would you suggest make the most sense to be considered for an EPR regulation in Yukon?	Yukon just jumped in with a broad list of electronics. That was good. What problem are we trying to solve? What is going to landfill that shouldn't be?	Mining industry – equipment left behind (e.g., oil drums, slag heaps).	Materials Recycle BC currently collecting (PPP).	All batteries regardless of chemistry and size.	Volume vs toxicity deciding factors.			I think that all depends on whether Yukon is planning to manage the product itself, the current products regulated and the willingness of stewards in BC to harmonize. The low hanging fruit may be a good start to test the process and / or the products that are causing Yukon the most grief.	Whatever materials represent significant waste and cost challenges. Still needs to be environmentally responsible. Follow progression in other jurisdictions.	Beverage containers, PPP, electronics (small appliances and electronics should be combined).
How difficult would it be to transition e-waste and electrical waste stewardship program in Yukon currently administered by you to an EPR model? What would the process involve?	Same time (generally at least a year) as previous implementation question. Work involves setting up contracts, etc. Reporting portal would stay the same. Compliance / online sales – biggest challenge is online sales. Needs to be covered under regulation. Ultimately government needs to enforce. Ultimately would be great to work jointly with Customs – but needs to be governments working together. Needs to be facilitated by regulation – need levers for enforcement. Does EPR make sense in Yukon? What are you trying to accomplish? Ontario transition has issues.									
How can PROs deal with legacy products and on-line sales?		Legacy products are factored into costs. Fees used to be high to build up a reserve. Have declined over time. Talk to the payers (manufacturers), not the PROs, for example, EPSC, RCC. Trade associations. Been trying to harmonize across Canada. Can only bring in one price to the country.	N/A	Deal with them on a priority basis.	Legacy products are part of the program. Don't care when it was sold. As long as it is obligated.	In our new programs, legacy products were managed through grants from government.	Concerns with contamination. Not likely a big problem with oil.	Should TSBC ever get the other tires added to the regulation, this is a question we will struggle with. One solution being floated around is to set the eco fee high enough to manage this product and then reduce the fee over time once the legacy inventory is dealt with. Decreasing a fee is much easier than increasing it. Adding to this is the uncertainty of how much legacy product is out there, so some assumptions or surveys would need to be done before determining the eco fee.		
How do on-line sales and sales in other jurisdictions impact your PROs operations?		Internet likely big for Yukon. If no presence in Yukon, hard to enforce. Need level playing field. ARMA would work well with Yukon. Need system that works. Link to Alberta. OK with either stewardship or EPR. As long as there is legal backdrop. Need compliance abilities.	Most producers have a distribution centre that would obligate them. Residency. Big issue.	Yukon government needs to create a level playing field – this includes online sales. Non-compliance impacts revenues and services. In BC, the lack of MoE enforcement has caused the CBA to reduce its delivery of the requirements in the Recycling Regulation. Free riders must be prevented.	Online sales increasing. Not a huge impact on Product Care. Need to be clear on who the obligated party is. Need partnership between government and PRO – approach party together. Need a method of enforcement.	This hasn't been as prevalent in the products we currently manage. However it is becoming more of an issue for some and will probably be even more common in the future.	Not a big issue – more in remote areas. Cross jurisdictional issues more likely.	We collect eco fees from online sales into BC.		

Organization	EPRA	EPSC	CSSA / Recycle BC / MMS Western	Canadian Battery Association	Product Care	Cleanfarms	BCUOMA	TSBC	MARR	MMBC / Cncorp
Do you think eco-fees or producer/member funding is more appropriate for the products your PRO collects?				This is not a decision of governments. It is a decision of the Producers and they will choose the best mechanism for their products and customers. For the CBA, we use member funding because batteries have a value at end of life.		Our members pay fees...or eco-fees if you will. Some call it an eco-contribution. We do have one member that covers a 'blanket' cost for one of our programs. That is because the overall cost is very small (about \$150K annually) and their association pays the fees rather than get into the minutia of us charging each of their members tiny amounts. If we did that, the cost of chasing down the contributions would cost as much as the program itself. They already pay their fees to an association based on their market share and that is most efficient. Regardless, usually eco-fees are the most effective way to ensure every steward pays their fair share of the costs. That is provided there is modulation of the fees – e.g., that each type of product which attracts a fee pays the fee based on the true cost of managing that product.	Likes fee on outside for compliance. Some of each. E.g., lube shops don't pass on. Main thing is funding happens. Dealt with through targets.	Most definitely eco fees.		
Additional Comments				One important point is that EPR regulations have many different stakeholder groups: the primary stakeholder group is the "Producer" who is the responsible party by the regulation. The second stakeholder group is the Stewardship Agency who develops the Stewardship Program(s) on behalf of the Producers. With respect to my first point is that in many programs, the Stewardship Agencies can have different goals and perspectives than the Producers. My suggestion is that the Yukon Government consult with the industry associations because they represent the Producers and there are times when the PROs and the Producers are not in agreement. I know you are aware of this distinction, but I raise this point in the hope that the Yukon Government recognizes that Industry Associations need to be included as a separate stakeholder group because we represent the Producers. Having said that, the Canadian Battery Association is both an Industry Association for the manufacturers and distributors of lead batteries in Canada and the CBA also manages the Provincial	Is there a monopoly concern around one PRO? Stand-alone usually allowed. Second PRO is the issue. Governance key to PROs.		Need to have understanding of current state – flow of materials. BCUOMA would do regulation – Yukon enforces against free riders.	Additional comment meant not as a criticism for our Ministry staff – compliance enforcement for non compliant producers. The steward is definitely the first party that needs to make considerable effort to bring a non compliant producer on board but when those attempts have failed, the steward needs the support of the Ministry to pursue the producer. This has failed for the most part and is primarily due to lack of resources at the Ministry – an ongoing problem for these folks. I feel if it was somehow documented or committed to within the Regulation the Ministry staff might have access to additional resources. Alternatively give these files to a dedicated compliance section of the Ministry.		

Province	BC	AB
Contact	Kristi MacMillan, Teresa Connor	Scott Nicol
To what extent has your government implemented EPR?	22 approved EPR programs. Framework regulation – outcomes based. Few prescriptions. Works well for good players. Government consolidated a number of programs in early 2000s under one overarching recycling regulation. Goal was for government to get out of operating programs. Framework defines common requirements. Recovery rate works well for things like packaging, but not reflective of materials like oil. Performance metrics need to reflect this. Suggested by stewards. Criticism that regulation forces a monopoly. Schedule 3 allows producers to do this on their own, rather than joining a PRO (e.g., small milk producers). Key is to clearly define outcomes (e.g., how are materials recycled).	Alberta model is different. More product stewardship approach. Managed by DAOs – established by regulation. Multi-stakeholder governance. Did consult in 2013 on EPR – positive response. Issue of timing. In 2014 Cabinet approval for more stakeholder engagement, but then a new government was elected.
What were the key issues your government faced when deciding to implement EPR?	Definition of products key – some needed to evolve in order to be clear and comprehensive. Needs to be clear what is regulated. Need clear definitions – e.g., accessibility. Allowance of visible fees – debate on acceptability. More incentive to industry when no visible fees. Enforcement is challenging. Producers should spell out what they are responsible for. Need clarity. Ease for consumer. Environmental risk / consumer confusion.	Not enough history.
Are there any voluntary stewardship or EPR programs in Alberta and how well are they working compared to the regulated stewardship programs?	N/A	Switch-out, pharmaceuticals, HHW program. Voluntary MOUs – plastic bags (underperformed), cell phones. Exercise in target setting – tricky.
Who were the key stakeholders who were engaged in the process?	Retail Council of Canada – well educated and on side. Comprehensive stakeholder lists. Extensive consultation is key. Get producers involved in process rather than lobbying. Municipalities strong drivers. UBCM. Politicians.	Electronics expansion. EPR for packaging and HHW.
What were the key concerns from stakeholders when bringing forward EPR?	Don't regulate like Ontario. Producers play key role. Don't be prescriptive. Set outcomes – don't tell them how to achieve them. Flexibility of how to meet outcomes key. Industry may want to outperform targets. Focus on recovery rates. Results not nuances. Packaging gets attention because public understands. Don't include streetscapes. Government stay high level and focus on environment.	
How did you determine priority materials for implementation?		Quantity, toxicity. What are the issues we are trying to address? Public/stakeholder opinion. Public commitment (CAP EPR). Too Good to Waste document – endorsed by cabinet. High profile materials such as Agricultural plastics.
Who is obligated under the regulation?		Depends on program. Beverage containers – beverage manufacture (ready to serve beverage) and must belong to common collection agent; manufacturer / retailer. ABCRC closest AB gets to EPR. ARMA – if you are a supplier of designated material, must remit a Env fee to ARMA.
Do all Alberta's stewardship programs include ICI?	N/A	Yes. Not sure about commercial paint.
How does the provincial/territorial government assess the impacts of products/materials when determining implementation priorities for EPR?	CCME list was key. Landfill impacts (amount being sent to landfill). Hazardous impacts. Can regulate now in anticipation of future challenges (e.g. electric vehicle batteries). Can name future materials.	
What legal aspects of the regulation were challenging?	Outcomes-based. Outcomes may not be clear enough. Internet sales a challenge. What authority does director have? Tracking materials to end state a challenge. Non-financial auditing may be too prescriptive. May set up producers to only show their best side. Need to be clear on reporting as it fits into regulation. How well does the plan need to be written? How detailed does reporting need to be? Great outcomes from good actors that may not be required to report to that level. E.g., ICI material boosting recovery rates. Need strong guidance to go with regulation to provide clarity of expected outcomes. Online sales! May not capture 3rd party sales. Producers working on this. Bankrupted Ireland's program. Calla (CSSA) good contact for research. EU doing. Depots not named in regulation – some depot concerns have been raised. Encorp moving into express depots. Need to consider socio-economic impacts (e.g., binners). Need to understand system and potential unintended consequences. Potential conflict between policy intention and legal reality.	Some companies send materials back to central Canada for recycling. Fees held by DAOs with stipulation of how money can be spent (can't cross-subsidize). Can be used for temporary loan. Pilot expansion of electronics program – money was only collected on TVs and computers. Potential for industry tension.
What about ICI? Should it be included from the start?	Municipalities are lobbying for ICI packaging because of volume in landfill. ICI challenging – resistance from the private sector. Would help Yukon with economies of scale. Part of EU directive. Needs to be considered in a very thoughtful way. Back-end incentive may make more sense. Need more understanding of the problem. Opportunities in consumer-facing ICI. Concerns around impact on small business.	
Potential harmonization between BC and Yukon	From a principle point of view, makes sense. Would be interesting to see if Yukon could write a simple regulation based on BC regulation and lessons learned. Same outcomes – improved details. Some internal interest in relooking at BC regulation. Natalia – 2-3 year timeframe. Important areas to harmonize – scope of products, product definitions. Who the producers are – cascading definition – e.g., include EPRA, CSSA	
What internal resources were required to implement and are required to administer EPR (e.g. time involvement of personnel, additional hires, specific budget requests, etc.)?	Has changed over time. Initially 4 staff in EPR for basic EPR programs – 4 staff and section head. Now 11 staff, 2 section heads, and director. Compliance has transferred to a different department. 12 is adequate with right supporting policies. Depends on current issues. More prescriptive in some areas – time consuming. Some programs more labour intensive – packaging takes up most time – 1 to 3 staff. Electronics easier. Depends on consumer issues. 5 program areas currently. Two main areas – regulatory and compliance. Main area compliance promotion. Free riders forwarded to regional branches	Not clear on required resources. Cabinet reports, regulation drafting, process for getting regulation ready. To administer program – 4 staff cover 5 programs, plus other issues. DAO accountability handbook.
What aspects of your regulation do you find effective?	Non-prescriptive. Keeps details out of regulation. Need good KPIs – could be stronger. Stakeholder consultation. Checklist helps in reviewing plans.	
What aspects of your regulation do you think could be improved?	Could be more aggressive on environmental outcomes. Focus on outcomes. Need expectations clearly laid out ahead of time – policy to establish what outcomes should be. Recommend laying out expectations and then build KPIs. KPIs are lofty – not	Material designation can become dated (e.g., electronics). Would be good to allow definitions to evolve.
What environmental or social outcomes are set in the regulation?	Recovery rate – 75% or other. Pollution prevention hierarchy. Free / reasonable collection. Require province-wide collection. Producers must pay cost. Must provide assessment of program. Social – e.g., binners – reflects on depots.	
How were these determined?	Looked to EU in designing regulation.	

Province	BC	AB
How does your regulation manage compliance and enforcement?	Compliance focused on free riders. Advisory letter if they miss reporting date. Compliance branch acts if targets not met. Can be fined if performance not met. Compliance group determines level of fine. Ministry compliance guide. Have not taken a heavy compliance approach. Reputation protection plays a key role – public availability of non-compliance – published by Ministry. e.g., juice boxes	
Performance monitoring - Metric - recovery rate% or alternative	Paint very difficult – estimates by industry. Transparency critical. Plan approval key point. Stewards help fund audits. Programs are very different.	Organization meeting quarterly with department.
Reporting schedule	Annually. Talk to other jurisdictions about performance measures.	
Oversight responsibility – government or third party?	3rd party non-financial audits. International auditing standard. Program must report by region.	
Auditing financial and non-financial performance - Set in regulation or program plan?	Program plan – required by director. PRO pays for 3rd party audit. Started as a review in 2012. Did consider putting in the regulation but currently working well as a part of the plan, so probably won't pursue. Annual financial audits. Could have been worded better as it only applies to those programs with fees. Some others (PPP) still do it as a matter of course.	Government staff does review of criteria checklist – business planning, performance, reporting. Bryna asked for sample. Is organization achieving performance metric? DAO sets their own performance measure.
How do you ensure consistency in the level of service for remote communities?	Reasonable and free access to service. 5000 or more population for PPP. Electronics – 45 min drive or 4500 population. There are underserved communities. Lots of innovation, e.g., mail-in service. Supplementary depots for small communities and extra materials.	
Do you accept a different level of service depending on community size or location?	Yes – service only for greater than 5000 people (PPP).	
Who is obligated under the regulation?	Cascading definition – manufacturer, brandowner, first importer – theory is the higher on the chain, the more ability to influence design. Franchises need to be recognized.	
How does your regulation address producers outside of the jurisdiction?	Has been challenging. E.g., LDB, liquor control board. Amazon pays for items that go through Vancouver warehouse, but direct shipments not. Retail Council trying to help. Some items users import themselves - bypass system. Canada Post is part of the problem.	
De minimis thresholds	Just for PPP - under \$1 million sales single point of retail sales, 1 tonne packaging annually. Charities – small producer definition	
How were they set?	For PPP – conversation with small business (internal consultation).	
\$\$ or tonnes?	Tonnes make more sense. Stewards can do this in an efficient, fair way.	
other	Oregon have a great research group - would be good to talk to. Don't forget legacy items. Regulation says all products currently or previously sold. BC definitions and categories up for review.	

App B3: Recycling Processor

Organization	Raven Recycling (Whitehorse)
Contact	Joy, Ira, Lewis
What materials do you currently handle?	Mixed plastics and paper, tin cans, beverage containers, cardboard, scrap metal (non-ferrous and ferrous), electronic waste, household batteries, auto batteries, textiles – both commercial and residential
What role do you see for your business within a Yukon EPR program for packaging and paper products? For other products?	Raven is ready to get out of non-refundable materials – don't have infrastructure or enough funding. Trying to get out of household recycling. Don't think it makes sense. Would take a lot of funding to build the right building to make it work. Comfortable taking commercial cardboard. Have a good baler and supporting equipment. Charge tip fee for commercial cardboard. Raven would be interested in operating a MRF if it was built. Have infrastructure for office paper.
What barriers or opportunities do you see for EPR in the Yukon?	Lack of infrastructure. Lack of collection system. Back-hauls go to Edmonton. Opportunities – need change-up. Chance for government to take charge.
Do you have any concerns about adopting EPR for Yukon?	Remote communities. Perception of unfairness if better service in Whitehorse than territory-wide. Need enough funding for organisations like Raven.
What materials would you prioritize for implementation under EPR?	All of them.
Questions from Raven:	<ul style="list-style-type: none"> - How would EPR look for Raven? - What is goal of EPR? - What about ICI? Could Yukon be pilot for including ICI? - What about remote communities?

Organization	Alberta Recycling Management Association (ARMA)
Contact	Ed Guggenheimer
How was your stewardship agency formed?	Incorporated under the Societies Act. Delegated Administrative Organization to maintain arms length.
What materials does your organization handle?	Started with tires. Copied for electronics, paint, and used oil materials. Also administer HHW program (government pays for disposal – ARMA administers/ oversees)
How many producers are members of your organization?	Board plus 4 industry councils that have producers as advisors. Registrants (over 5000) are those who are responsible in the programs. For tires, registered sellers not producers.
How do you establish fees that are charged on or for products?	Fee-setting mechanism that goes through Ministers office. Sustainability review that looks at program costs. Every processor must share financials with ARMA. Also do cross-jurisdictional review and talk to processors and consider other factors. Process leads to recommendations around fee adjustments. Plan to look at fees every 4 years.
Does your organization incentivize environmental design improvements to included products?	No. Hard for DAO to lobby.
How would you suggest programs are best able to accomplish this?	Need to harmonize across jurisdictions. Then can lobby as a group. Penalize for bad design. Question about harmonization – responded that there will never be a uniform regulation. There will be struggles with conformity. Fee structure, software, etc.
What ideas would you suggest for a program to provide a consistent level of service to remote communities?	ARMA on hook, not producers, so ensure that remote areas are serviced. Negotiate levels of service. Larger incentives for remote areas – zones set up with different levels of payment.
What aspects of existing EPR/ stewardship regulations do you find effective?	Regulation is strong. Regulation needs to be written properly and refreshed regularly. Need flexibility in product definition to accommodate product changes. Definition of recycling – needs to encourage highest and best use.
What aspects of existing EPR/ stewardship regulations do you think could be improved?	Regulation had a fee-setting mechanism that required Cabinet approval.
Has your organization ever worked with another stewardship agency or a Producer Responsibility Organization (PRO) to consolidate product collection, handling and transportation?	GFL is nation-wide. AB, BC and SK work together to allow for activities like bulking oil. Processors may handle products from multiple provinces – system to monitor so it is clear where materials came from. Also work together for studies and research. Need ecosystem to work together. ARMA may have more clout over free riders based on regulation.
How does your organization consider and work with local reuse/recycling systems?	Reach out to organizations to figure out how to work together. Relationships key.
How does your organization assess infrastructure needs? What infrastructure is expected to be required in a jurisdiction like Yukon?	Field staff visit sites – document infrastructure deficits. Program documents outline rules and requirements (e.g., OH&S). Also some infrastructure granting available. Don't own infrastructure. Alberta chose municipalities as the primary collection network.
How long would it take for your organization to establish a program in Yukon after a regulation is introduced?	Approximately 3 months. Issue lies with setting up regulation.
What materials would you suggest make the most sense to be considered for a regulation in Yukon?	Tires, electronics, paint, packaging, HHW
If Yukon were to transition the tires stewardship program to EPR, do you envision an ongoing role for ARMA?	ARMA could operate as a PRO or oversight body. Or hybrid.
Would you be open to collaboration with Yukon for the other stewardship programs (e.g., waste oil) that you run?	Absolutely. Already hearing from some processors about potential options.
Internet sales	3 rd party consultants hired to do audits of online activities. Have had success in recouping fees.

Organization	Mayo	City of Whitehorse
Contact		
Are you familiar with the concept of EPR?	yes	<p>The City of Whitehorse recognizes the Organization for Economic Co-operation and Development (OECD) definition of Extended Producer Responsibility (EPR) as a policy approach which extends the producer's responsibility for a product to the post-consumer stage of a product's life cycle, which includes disposal.</p> <p>There are two key feature of EPR Policy:</p> <ol style="list-style-type: none"> 1. Shifting responsibility, physical and financial, to producers and away from municipalities 2. To provide incentive to producers to incorporate environmental considerations into the design of products. <p>Development of a comprehensive EPR legislation that supports a sustainable recycling system aligns with goals in the City of Whitehorse Solid Waste Action Plan.</p>
What questions do you need answered about EPR?	What is all being considered?	<p>The questions below focus on establishing a standard of communication, clarifying the scope of EPR, assessing impacts on private operations and public services, and engagement with the public. We also recognize that for certain questions, answers will evolve as EPR is established.</p> <p>Development and Rollout</p> <ul style="list-style-type: none"> • How will the role of the City of Whitehorse be established throughout development of EPR in the Yukon? Will all work move through the Ministerial Committee on Solid Waste? Costs, infrastructure, and administrative commitments associated with new programs must be clearly communicated and agreed upon. • How will EPR function? Will it function as an IPR framework (Ontario) or similar to BC where a PRO organization carries out the program? • What is the anticipated timeline for EPR development and rollout? • How will priority materials be selected? • How will service standards, such as material recovery targets and accessibility targets, be established, monitored, and enforced? • If required, where will infrastructure that offers space to collect and process materials be established? • Will residential, commercial, and ICI sectors be included in EPR? Will this vary based on material? • How will hard to serve sites be addressed? These include public spaces (parks, streetscapes) and multi-unit housing. • Who will be considered a producer? • How will online purchases and out of territory purchases be incorporated into EPR? • Will materials on the Designated Material Regulation (DMR) be added to EPR? • Will revenue from recyclable materials be split with municipalities? • What, if any, bylaws will municipalities need to adopt? For example, a bylaw requiring buildings to have a recycling collection service. <ul style="list-style-type: none"> • How will the public and private sectors be engaged as EPR is developed? • How will recycling Diversion Credits be phased out as EPR is established? • What will the impact be on businesses in Whitehorse? What will be the benefits to businesses? • How will current residential recycling services be impacted? • How will users be informed of changes? <p>Maintenance</p> <ul style="list-style-type: none"> • What is the City of Whitehorse's role in maintaining EPR programs? • How will benefits of the program be reported? Will environmental gains be reported in GHG equivalencies? • How will new sites and residents be identified and incorporated into the program?
What materials do you think should be a priority for Yukon EPR?	Special waste, hazardous waste, waste oil jugs, electronics, etc.	<p>In order of priority:</p> <ul style="list-style-type: none"> • Hazardous material / special waste in order of priority: waste oil, disposable propane bottles, paints & coatings. These materials have a disproportionate effect on our environment per volume and the public frequently requests greater access to disposal options than what is currently being provided. • Packaging and printed paper (PPP). This material category includes paper, cardboard, aluminum, and plastic packaging products. • Tires. While progress was made when tires were added to DMR, additional funding is needed to remove tires at a more frequent rate to prevent accumulation at the City of Whitehorse Waste Management Facility (WMF). • Electronics recycling should expand under EPR to increase the variety of electronic devices accepted. There is currently a gap in materials accepted at Yukon Government's E-Waste Depot and materials controlled within the City of Whitehorse Waste Management Bylaw. • Metals and appliances are lacking a program that supports their collection and recycling. The result is an accumulation of metals at the City of Whitehorse WMF.

Organization	Mayo	City of Whitehorse
<p>How does your municipality currently handle materials that may transition to EPR?</p>	<p>They currently end up in the landfill, or in a household hazardous shed for later delivery to Whitehorse, during hhw day or delivery to a waste oil collector</p>	<p>With the support of Yukon Government, two Household Hazardous Material events are hosted at the Waste Management Facility (WMF) each year. These events allow residents to dispose of hazardous waste/special waste free of charge. Commercially produced hazardous waste is either privately shipped out of territory or collect by KBL Environmental for a fee.</p> <p>Packaging and printed paper (PPP) materials are collected at two local recycling processors; Raven Recycling Society and P&M Recycling. Businesses pay a \$60.00/tonne tipping fee for cardboard at Raven Recycling Society, otherwise disposal of recyclable PPP materials is free of charge. Collection of PPP materials is available to Residential and Institutional, Commercial, and Industrial (ICI) sectors for a fee. Whitehorse Blue Bin Recycling collects PPP from many residents and the ICI sector. Pacific North West (PNW) and General Waste Management (GWM) also collect cardboard from the ICI and C&D sector. Finally, cardboard is collected at the City of Whitehorse Transfer Station before being transported to Raven Recycling Society.</p> <p>Tires listed under DMR may be disposed of free of charge at the City of Whitehorse Transfer Station. Tires are collected at the City of Whitehorse transfer station and removed for recycling periodically by YG. Currently, more tires are collected than removed leading to continued and problematic accumulation.</p> <p>Many electronics are collected free of charge at Yukon Government's E-Waste Depot located at Raven Recycling. However, not all electronic devices are accepted, leading to a gap between Yukon Government legislation and the City of Whitehorse Waste Management Bylaw.</p> <p>Appliances, also referred to as White Goods, may be disposed of at the City of Whitehorse Transfer Station (TS) or at Raven Recycling Society for a fee. If appliances contain hazardous material, the fee for disposal at the TS is higher. Appliances are brought to Raven Recycling for processing several times a year. However, metals and appliances accumulate each year at the WMF.</p>
<p>What level of service within your municipality would you expect under EPR?</p>	<p>Don't know.</p>	<p>Hazardous / Special Waste: Increase service level - Establish collection depot for residentially produced hazardous waste to provide year round access to disposal</p> <p>Packaging and Printed Paper (PPP): Increase service level - Increase household and multi- unit recycling collection service to capture more material - Maintain access to public drop- off of PPP material - Increase commercial collection services by providing bin collection variety</p> <p>Tires: Increase service level - More support is needed to remove tires for recycling</p> <p>Electronic: Increase service level - Increase the number of electronics accepted for recycling.</p> <p>Metals / appliances: Increase service level - Increased support for recycling of metals stockpiled at WMF</p>
<p>What barriers are there to recycling/reusing materials locally?</p>	<p>Don't know.</p>	<p>An investigation into material specific barriers is needed for accurate insight.</p> <p>Barriers that are common to various materials include:</p> <ul style="list-style-type: none"> • Material quality • Material cleanliness • Material separation • Service accessibility • Ease of collection • Infrastructure to collect and process materials • Business and household incentives for recycling and reuse • Knowledge and awareness of local recycling/reuse options and requirements • Support within organizations to champion and coordinate recycling and reuse programs
<p>Could EPR negatively affect any current local reuse/recycling (e.g.,</p>	<p>Don't think so</p>	<p>There are a range of factors that affect reuse and recycling and these are often material specific. Material specific investigations are needed to produce a clear and accurate response.</p>

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<p>What existing or planned infrastructure or local businesses (e.g., waste haulers) in your municipality may be useful to collect, transport, or recycle wastes?</p>	<p>Don't know. There may be a contractor that might get into this.</p>	<p>Collection</p> <ul style="list-style-type: none"> • The City of Whitehorse has a gatehouse with a scale for weighing and recording vehicle weights before and after material disposal. This scale system enables charging users a fee by weight and tracking the weight of materials disposed of in and diverted from the WMF. A second scale is scheduled to be installed in 2021. • City of Whitehorse Transfer Station is a facility for the public to dispose of sorted waste materials into separate bins. This facility is scheduled to undergo upgrades in 2021. • Waste Management Facility (WMF) has limited space to stockpile recyclable materials such as metals and tires. • Land within the WMF may be available to lease for a central location to collect & process EPR materials. • The City of Whitehorse collects organics from all sectors, including multi-unit housing. It also provides curbside collection of waste to households with 4 units or less. • City of Whitehorse owns and operates a fleet of waste collection vehicles for curbside collection of waste and organics. <p>Recycling</p> <ul style="list-style-type: none"> • The Compost Facility, located at the WMF, recycles organics into compost. <p>Administration</p> <ul style="list-style-type: none"> • The City of Whitehorse completes waste audits every 7 - 8 years. This data is valuable for reporting and strategic planning. • The City of Whitehorse completes waste diversion calculations each year. This information is useful to understanding progress towards diversion goals. • A compliance officer enforces waste bylaws and records data on waste loads brought to the Waste Management Facility. This enforcement and data is also useful for making and understanding progress in meeting diversion goals. • The City of Whitehorse hosts and manages the What Goes Where app – this app provides current information on how to dispose of materials within Whitehorse. It is online, free, and easily updated. • There is limited administrative capacity at the City of Whitehorse to manage new programs. <p>Contact local businesses directly for information regarding their infrastructure and resources:</p> <ul style="list-style-type: none"> • BL Environmental • Raven Recycling Society • P&M Recycling • General Waste Management • Whitehorse Blue Bin Recycling • PNW Freight Systems