



EPR Canada

SEPTEMBER 2015

2014

Extended Producer Responsibility (EPR)

REPORT CARD

What's Inside

Summary of advancements in EPR policy and programs in Canada during 2014

Newfoundland & Labrador

Prince Edward Island

Nova Scotia

New Brunswick

Quebec Ontario

Manitoba Saskatchewan

Alberta British Columbia

Yukon

Northwest Territories

Nunavut

Federal Government



EPR Canada reports on the progress made by Canadian federal, provincial and territorial governments year-over-year in developing and implementing extended producer responsibility (EPR) policies and programs in compliance with the Canadian Council of Ministers of the Environment's (CCME) Canada-wide Action Plan on EPR.

This is the fourth in a series of EPR Canada publications reflecting the progress jurisdictions have made to date, with a particular focus on the activities that occurred in the 2014 calendar year. See previous report cards (2011 and 2012) and a summary (2013) at www.eprcanada.ca.

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Email: info@eprcanada.ca

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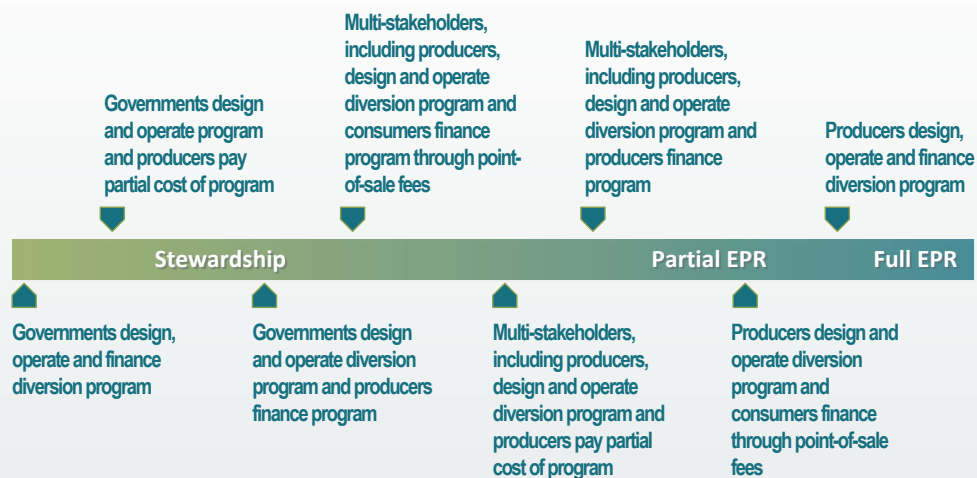
EPRC (Extended Producer Responsibility) Canada is a not-for-profit organization formed in 2011 by [eight like-minded Canadians](#) who have been involved in EPR policies and programs since they first began to take hold in this country in the 1990s. The goal of EPR Canada is to foster continued growth and improvement of EPR policies, programs and practices in Canada (www.eprcanada.ca).

What EPR Canada Seeks to Accomplish with Our Series of Report Cards

In 2012, EPR Canada set out to produce an annual report on federal, provincial and territorial EPR policies, programs and practices to:

- 1) encourage leadership, innovation, best practices and effective EPR policy and program development, implementation, management and harmonization across Canada; and
- 2) encourage jurisdictions to evolve product stewardship and partial EPR programs to full EPR programs

Transitioning Product Stewardship to Full EPR



Publishing Schedule

After publishing two consecutive, fully-scored report cards [EPR Canada's 2012 Report Card](#) (focusing on 2011 activities) and [EPR Canada's 2013 Report Card](#) (focusing on 2012 activities), EPR Canada, recognizing that development of EPR policies and programs takes time, published [EPR Canada's 2014 Progress Summary](#) (reflecting on 2013 activities)

Next Report Card in Fall 2017

Following this 2015 fully scored report card, which focuses

on 2014 activities, EPR Canada will once again allow time for jurisdictions to develop and implement programs. During 2016, we will not issue a fully scored report card, but instead will issue periodic Bulletins highlighting topics of interest in EPR policy and program development. EPR Canada will publish the final scored report card in 2017 reflecting upon the 2016 program activity year. EPR Canada hopes that the final publication will show significant progress on implementation of [CCME's Canada-wide Action Plan \(CAP\) Phase 2 material](#).

EPR Report Card Scoring

In April 2015, EPR Canada sent a survey questionnaire to each government asking them to complete and return the surveys. The questionnaire asked each jurisdiction to describe its EPR practices, achievements and innovations that contributed to the development of this national picture of the use of EPR regulatory instruments, policies and programs across the country. Using a standardized assessment model, EPR Canada members evaluated each response and allocated scoring, using the A, B, C grading system employed by most educational institutions. (See EPR Canada Report Card Scoring on page 4.)

EPR Canada evaluates jurisdictions' performance in EPR policy in three main category areas:

1. **Commitment**—towards [CCME's CAP Phase 1 and Phase 2 product and material lists](#).
2. **Implementation**—EPR implementation focuses on policies and practices to support operations including:
 - a. activities to ensure that producers met their regulatory obligations, including free rider tracking and actions;
 - b. activities to monitor the performance of EPR activities including program reviews;
 - c. EPR legislation review procedures and outcomes; and
 - d. evidence of policies and practices to support EPR outcomes
3. **Accountability**—target setting and verified public reporting on results, including:
 - a. performance objectives including collection, recovery and recycling targets (and target setting methodology) for each EPR program;
 - b. non-diversion environmental performance measurement practices;
 - c. enforcement and consequences if producers or producer responsibility organizations do not achieve their targets, including dispute mechanisms; and
 - d. transparent and public reporting on each EPR program's annual report and program reviews.





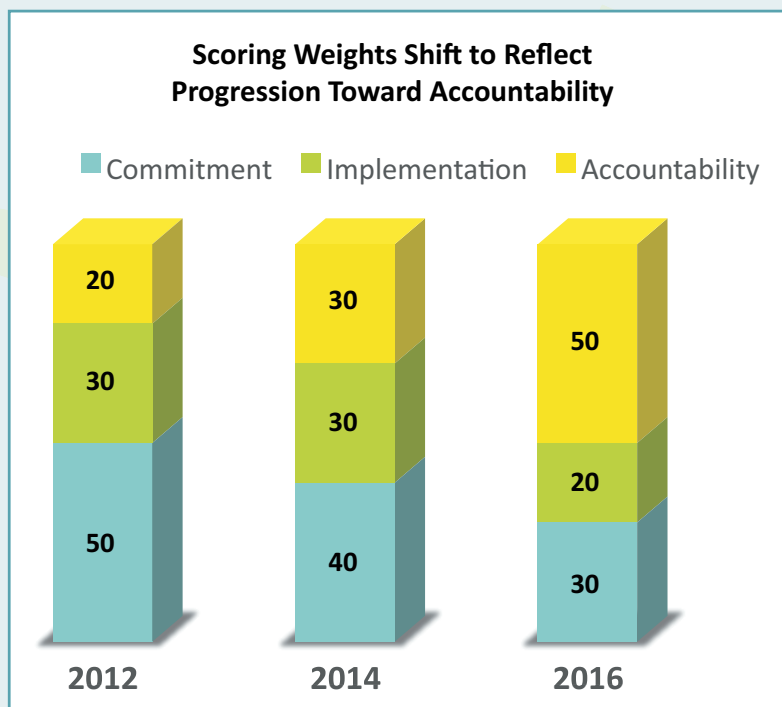
2013 – 2017 EPR Score Card Weighting

EPR Canada has adjusted over time the weighting of the scores in each category—Commitment, Implementation and Accountability—to reflect an expected progression in the adoption of EPR policies, programs and practices over the period from 2012 to 2017. Applied beginning the 2012 program activity year, it accomplished two objectives:

1. Weigh more heavily towards EPR commitment (and to some degree implementation) in the early years reflecting a logical progression in the adoption of EPR policies; and
2. Shift the weighting progressively in the latter years towards accountability activities, with less emphasis on commitment and implementation (i.e. as EPR policies mature).

The bar graph at right presents the weighting adjustments for report cards published over the period.

Note that depending on how jurisdictions have approached implementation and accountability activities, the year-over-year re-weighting of the categories may result in a lower overall grade than achieved in previous years.

















Questionnaire Response Rate

In 2015, all of the provinces submitted responses to the EPR policies and programs questionnaire; however, the responses varied in level of effort and details provided. Environment Canada responded with a letter but did not complete the questionnaire. As in previous report cards, while a summary of EPR activities in the Territories is included in this publication, in respect of the waste management challenges they face and the infancy of EPR policies in the north, EPR Canada does not score the Territories.



EPR Grades for 2014 Activity Year Compared to Previous Scored Years

EPR Canada scores questionnaire submissions from the jurisdictions in teams. Each person on a team reviews and scores each submission independently, then the team meets to arrive at consensus scores. The entire EPR Canada membership then meets to review all category scores and reach consensus on each jurisdiction's results. EPR Canada members discuss the results of the submission scores with each jurisdiction to ensure the reason for the score is clear. Only the summary grade scores are made public.

| | 2014 Grade* | 2012 Grade | 2011 Grade |
|---|-------------|------------|------------|
|  Newfoundland and Labrador | D | C- | C- |
|  Prince Edward Island | C+ | C+ | B- |
|  Nova Scotia | C- | C | C+ |
|  New Brunswick | D | C | C- |
|  Quebec | B+ | B+ | B- |
|  Ontario | C | C+ | C+ |
|  Manitoba | B | B | B- |
|  Saskatchewan | D | D | C- |
|  Alberta | F | D | C |
|  British Columbia | A | B+ | A- |
|  Yukon | Not scored | Not scored | Not scored |
|  Northwest Territories | Not scored | Not scored | Not scored |
|  Nunavut | Not scored | Not scored | Not scored |
|  Federal Government | F | F | F |

Range of Score Allocations

| Grade | % | Description |
|-------|--------|--------------|
| A+ | 90-100 | Excellent |
| A | 85-89 | |
| A- | 80-84 | |
| B+ | 76-79 | Good |
| B | 72-75 | |
| B- | 68-71 | |
| C+ | 64-67 | Satisfactory |
| C | 60-63 | |
| C- | 55-59 | |
| D | 50-54 | Marginal |
| F | 0-49 | Inadequate |

**EPR Canada had gradually shifted the weighting of scores for each of the three categories in subsequent questionnaires to reflect a logical progression in the adoption of EPR policies, programs and practices. The re-weighting may result in a lower grade than achieved in previous scored years. A scored report card was not published in 2014. Instead EPR Canada published a Summary Report in 2014 covering the 2013 activity period.*

Note: What the EPR Report Card Does NOT Do

The EPR Report Card rates jurisdictions on their commitment to and their adoption and implementation of EPR policies, regulations and programs. It does not evaluate the waste diversion and environmental performance achievements of producer responsibility and stewardship programs.



JURISDICTION SUMMARIES— Progress in EPR during 2014

Newfoundland and Labrador



D+

Newfoundland and Labrador maintained its commitment to implementing EPR programs and has formally adopted EPR as a policy for a number of materials. In 2014, the province announced it is in the early stages of implementing new measures for managing printed paper and packaging (PPP) materials, used oils, glycols and some other hazardous materials. The province implemented an EPR program for managing electronic waste beginning in August, 2013 and for waste paint products in May of 2012.

Factors Affecting Score

Strengths

- + Implementation of an EPR program for used electronic products and waste paint products
- + Consideration of EPR for municipal PPP programs, used oil, glycols and some hazardous materials

Deficiencies

- Slow roll out of EPR designations along with EPR program regulations and operational programs
- Minimal progress demonstrated in its commitment to comply with CCME CAP program for EPR

Prince Edward Island



C+

Prince Edward Island (PEI) reaffirmed its commitment to EPR programs in 2014 and also has established roles and responsibilities for producers in regulations. The province updated its EPR regulation in 2014 and has listed many CCME CAP Phase 1 materials in its regulations. In addition, PEI is reviewing how it can move forward on Phase 2 materials.

PEI has implemented EPR programs for managing electronic waste beginning in June 2010; waste paint products in September 2012; and added mercury lamps, used oil/glycol, lead acid batteries, pharmaceuticals and medical sharps in 2014. PEI is also working jointly with the other Atlantic Provinces on packaging and printed materials and is looking at the “Switch out” program for vehicles.

Factors Affecting Score

Strengths

- + Implementation of EPR programs for most categories of CCME Phase 1 products with others pending
- + Updated and revised its regulatory framework in 2014
- + Establishing clearer roles for producers in its regulations

Deficiencies

- Does not utilize targets as a mechanism to drive recovery of EPR materials
- Does not require performance audits of data pertaining to a program's performance

Nova Scotia

Nova Scotia initiated a consultation process in 2014 with the objective of implementing new EPR framework legislation. While the focus of the consultation process was adding Extended Producer Responsibility regulations for designated products, the province also consulted on expanding disposal bans and existing diversion programs. In addition, the province consulted with municipalities and other stakeholders on the possible implementation of a program for PPP. No new EPR programs were implemented during 2014.

Nova Scotia has strong supporting mechanisms in place such as landfill bans, access requirements, communications and consultation requirements.

Factors Affecting Score

Strengths

- + Implementation of EPR programs for used electronic products and waste paint products
- + Strong regulatory framework in place with clear consequences for non-compliance with EPR programs

Deficiencies

- No new materials added to the EPR roster over the past two years
- Limited use of targets and no performance reviews since 2010

New Brunswick

While New Brunswick (NB) continues to state its commitment to EPR, it is struggling to act on that commitment. With the exception of the 2014 launch of an EPR program for used oil and glycol, the province has made little progress on other products designated under the CCME's Canada-wide Action Plan for EPR. For example, New Brunswick was the only province without an electronics and electrical equipment EPR or stewardship program in 2014. (NB released a draft EPR regulation for electronics and electrical equipment in July 2015.) The used oil/glycol and paint programs are the only EPR programs currently in place.

The tire program continues to be operated as a stewardship program by Recycle New Brunswick. NB worked with the other Atlantic Provinces to review options for PPP in 2013/2014. (Consultations on how to proceed with municipalities and other stakeholders began in 2015.)

Factors Affecting Score

Strengths

- + Implementation of an EPR program for used oil and glycol with recovery targets
- + Consideration of EPR for municipal packaging and printed paper programs



C-



D



B+

Deficiencies

- Continued slow roll out of EPR designations along with EPR program regulations and operational programs
- Lack of commitment to transition existing stewardship programs to EPR

Quebec

Quebec's action on EPR continues to be guided by the goals and objectives of the Residual Materials Management Policy and its 2011 – 2015 Action Plan. The province emphasized its commitment to EPR through such initiatives as a regional outreach program implemented by Recyc-Quebec and a detailed tracking of the recycling of materials collected by programs and end-of-life destinations.

In addition, the province broadened industry responsibility to producers whose products are not explicitly referenced for producer responsibility but include components such as batteries and mercury lamps that are covered under the regulations. The definition of who is a producer under the regulations was further explained and clarified and included examples.

Quebec also is working on the preparation of a list of priority product categories for EPR including detailed profiles of candidate products such as large household appliances using a weighted multi-criteria analysis.

The province began using administrative monetary sanctions to address program free-riders as a more effective response than time-consuming criminal charges. Quebec continues to review the option of giving the full operational responsibility for PPP programs to producers.

Factors Affecting Score

Strengths

- + Clear commitment to EPR and its promotion
- + Adoption of more efficient enforcement mechanisms through the use of administrative monetary sanctions
- + Significant effort to analyse and set priorities for EPR candidate products and materials
- + Consideration being given to shifting to a full EPR responsibility model (producers responsible for both financing and operation) for PPP programs

Deficiencies

- Confidentiality agreements signed by Recyc-Quebec with programs limit public reporting on program performance
- Program reports are filed with the Ministry but these reports are not made public
- Information on program performance is limited or not available

Ontario

Under the current Waste Diversion Act (WDA), Waste Diversion Ontario (WDO) continued to work with industry funding organizations (IFOs) to improve existing programs in a variety of areas including establishing consistent performance reporting structures, evoking dispute resolution processes and further defining operating standards. Ontario continued its stakeholder consultations with the intent to introduce a new Resource Recovery and Waste Reduction Strategy, with EPR as a central tenant. In 2014, WDO also approved one new Industry Stewardship Program (ISP) for paint.

Factors Affecting Score

Strengths

- + Mechanism and clear responsibility for the province to prosecute non-complying producers
- + Clearly defined performance targets within minister approved program plans
- + Through WDO, ongoing oversight of performance targets
- + Standardized reporting for producer programs
- + Comprehensive, third party review of reported performance
- + Transparent public reporting

Deficiencies

- Producers are mandated to join collectives (IFOs), limiting ability to comply as an individual producer
- Collective design and operation of programs on behalf of obligated producers
- Producer/municipal cost shared models continue for printed paper and packaging and hazardous waste; producers are not fully physically or financially responsible
- No consequences for non-compliance
- Lack of operations and performance standards

Manitoba

Since 2012, Manitoba has designated under its EPR regulations all of the CCME CAP Phase 1 materials which are managed by 13 different producer organizations. The province has assigned responsibility for compliance and oversight of EPR programs to Green Manitoba (to take effect in 2015; Green Manitoba will be coordinating enforcement actions with the government).

In 2014, Green Manitoba released a public discussion paper outlining several new waste reduction initiatives that demonstrated EPR as a central policy tool, supported by several other regulatory measures. The discussion document sets out an expansive list of materials under consideration for EPR for the future, and proposes to redefine producers and assign responsibilities for program design, operations and regulatory outcomes directly to individual producers. Manitoba is actively working with the BC Government to identify best practices as it relates to compliance



C



B

and enforcement and is considering introducing disposal bans focusing on those materials and products that are designated under its EPR legislation.

Factors Affecting Score

Strengths

- + Disposal levy that is used to support waste reduction infrastructure and programming
- + Assigned oversight to Green Manitoba (to take effect in 2015)
- + Long term planning to identify additional materials to designate under EPR legislation
- + Actively working with other provinces to identify best practices and harmonize policy design and implementation

Deficiencies

- No performance target setting within the regulation or approvals process
- Lack of active oversight and performance monitoring
- PPP continues to be cost shared with no producer responsibility for program operations
- No consequences for non-compliance



D

Saskatchewan

Saskatchewan passed its *Household Packaging and Paper Stewardship Program Regulations* on February 7, 2013 but the program did not launch in January 2015 as planned. A program plan was submitted that included producer funding of up to 75% of municipalities' costs to operate efficient and effective recycling programs, but the program launch was deferred after the Minister of Environment announced, just prior to launch, a permanent exemption for certain businesses and a two-year transition exemption for all newspapers, regardless of size.

Most of the province's diversion programs, including those for used oil, scrap tires, waste paint and waste electronics, require producers to assume full responsibility for program costs and operations.

Saskatchewan was the first province in Canada to develop (in 2013) a regulatory framework for the diversion of agricultural film and twine (e.g., grain bags, silage wrap, baler twine). However, regulations have not proceeded beyond the framework stage.

Factors Affecting Score

Strengths

- + Producers assume full financial and administrative responsibility for used oil, scrap tires, waste paint and waste electronics
- + Ministry of Environment took enforcement action under the scrap tire regulations

Deficiencies

- Province does not set specific performance targets for regulated materials
- No requirement for producers to measure the non-diversion performance of programs
- No requirement for an independent audit of data pertaining to a program's performance

Alberta

Alberta continues to use what they consider to be the most appropriate tool for each specific material, rather than a focus on EPR. Alberta utilizes stewardship programs for tires, electronics, paint, used oil materials and beverage containers managed by Delegated Administrative Organizations (DAOs) that are arms-length from government, and that are governed by representatives from a variety of stakeholder groups, including producers. As Alberta is the only provincial government that does not endorse EPR as a policy instrument, their scores on this EPR report card reflect this.

Subsequent to public consultation in late 2013 on a proposed new regulation that would enable EPR—with printed paper and packaging as well as HHW suggested as the first materials to be designated—Alberta has made no further progress on introducing EPR programs. Further consultation on the proposed regulation is planned, although exact timelines are unclear, and it is unknown when changes may be considered at the legislative level.

Changes to existing recycling regulations that include removing fees from regulation and expanding used oil and electronics programs also remain underway.

Factors Affecting Score

Strengths

- + Greening Government Strategy sets out government procurement as a supporting measure
- + DAO structure institutionalizes stakeholder involvement and engagement
- + DAOs monitor diversion and non-diversion environmental performance and set program targets

Deficiencies

- No commitment to EPR or plans to follow the CCME CAP on EPR
- Lack of progress on introducing EPR programs
- No signals to producers to improve product environmental performance or program efficiencies

British Columbia

Producers assumed responsibility for packaging and printed paper (PPP) on May 19, 2014, as required by BC's Recycling Regulation. Multi-Material BC (MMBC) began planning for its PPP Stewardship Plan in 2011 and, following approval by the Ministry of Environment (MOE) in April 2013, began operations in May 2014.

BC approved a new Administrative Penalty Regulation under the Environmental Management Act in June 2014, making administrative penalties another tool in the ministry's escalating scale of compliance action. Compliance actions in 2014 were primarily focused on producers of PPP that were not registered with a stewardship agency with an approved plan.

In 2014, the MOE worked with stewardship agencies through the EPR Enhancement Project to implement improvements in program performance, collection and operational excellence, education and awareness, and local government engagement and relationship building.

As of 2014, BC has industry-led recycling programs for 79% of the product categories in the CCME CAP for EPR, an increase of 11% since 2012.



F



A

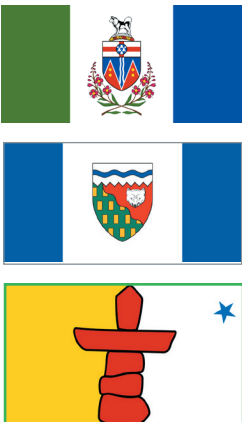
Factors Affecting Score

Strengths

- + Following the CCME's CAP on EPR implementation schedule
- + Utilizes a non-prescriptive, results-based regulation that assigns responsibility for end-of-life management to producers or their agents
- + Regulation includes a pollution prevention hierarchy with which producers are to manage environmental impacts of their products
- + Expanding efforts to enforce producer compliance
- + Requires stewardship agencies to report using a standard template including third party audits of performance data
- + MOE retains a contractor to review third party audits and, based on the contractor's assessment, provides feedback on performance gaps and recommends continuous improvement efforts for each stewardship program

Deficiencies

- Limited MOE resources for producer and program oversight
- No penalties for missing performance targets
- Limited provincial initiatives to support EPR programs (e.g., material ban, landfill surcharge, green procurement)



Yukon, Northwest Territories, Nunavut

While there are a number of Territory-operated stewardship programs in the Yukon and the Northwest Territories as well as some voluntary producer-run programs, there are no legislated EPR programs planned or operated in any of the three Territories at this time.

Remoteness from major centres of population, small isolated communities and limited infrastructure continue to hamper advancement on EPR in the Territories. Such challenges are more acute in Nunavut which depends exclusively on seasonal shipping and air transportation and has no road or rail access to either the south or among communities. To a significant degree, efforts in the north continue to be largely focused on improving basic waste management services through such means as improved standards and practices. Efforts are also focused on maintaining existing stewardship initiatives and considering new ones, such as for electronics in the NWT as early as fall of 2015.

A major step forward has been taken by Yukon, however, which has completed legislative changes necessary to enable EPR regulations through amendments to the Yukon Environment Act.

The Territories are working together on waste management and waste diversion strategies and programs especially as part of the CCME Waste Management Task Group's project to identify opportunities and share best practices for implementing EPR in northern and remote regions. To this end, under CCME auspices, options for EPR were identified and reviewed in 2014/2015 and were discussed at a workshop in Yellowknife in March 2015.

Canada

While Environment Canada (EC) has continued to indicate its support for the CCME CAP for EPR, it has shown an unwillingness to use its EPR authority under the *Canadian Environmental Protection Act* (CEPA 1999). EPR was cited as early as 2007 as a possible instrument for the end-of-life management of some mercury containing products and was referenced again in February 2011 as a specific option for the risk management of lamps. In 2014, however, EC abandoned the possible use of an EPR instrument for mercury lamps and instead announced that it would only issue a guidance document on their management. This decision has left the management of mercury lamps to the provinces and appears to signal for the time being an end to any consideration of EPR as a national regulated approach to toxic substances and products containing toxic substances.

Factors Affecting Score

Strengths

- + Continued engagement with CCME

Deficiencies

- Lack of any policy supporting EPR or regulatory action using EPR

N.B. Environment Canada did not complete the EPR Canada questionnaire but did submit a letter signed by the Minister.





Highlights of This Year's Responses

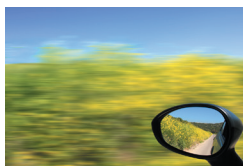
Commitment to EPR in Canada remains strong. The large majority of jurisdictions continue to support EPR as an environmental and waste diversion instrument and in a number of cases reaffirmed their commitment in 2014. Some jurisdictions have committed to EPR as part of more broadly-based waste frameworks and some view EPR and waste diversion as strategies to combat climate change.

The regulation and implementation of EPR programs continues steadily, and the CCME's goals under the Canada-wide Action Plan on EPR are gradually being met. There continues, however, to be a significant difference in the number of provincial EPR programs with the leading jurisdictions largely covering most or all of the CCME Phase 1 list of products while others are slowly working their way through the list of priorities. For example, most jurisdictions have in place programs for electronics and paints and coatings, but in the area of household hazardous wastes, packaging and mercury containing products, there is a patchwork of programs and a mix of EPR and stewardship initiatives.

Strategies and programs targeting the Phase 2 list of products (construction, renovation and demolition [CRD] materials, furniture, textiles and carpet, and appliances) are still in their infancy, and it is an open question regarding the degree to which the EPR Action Plan target of having operational programs in place by 2017 will be achieved. However, based on work that has been done by Environment Canada on CRD wastes, other research and a few pilot programs, there is a growing understanding of the challenges and opportunities for these product areas.

Program performance and accountability for EPR programs are areas where there is still a need for improvement. Not all jurisdictions set performance targets for programs; in others, independent reporting on program performance is not required and in most cases there are no penalties for failing to meet targets, suggesting that targets may be simply aspirational. There is also concern that third party agency and departmental oversight functions are not sufficiently resourced to keep up with the performance measurement and enforcement demands imposed by the growing number and scope of programs.

Cooperative work and communication between jurisdictions on EPR continues to be facilitated through the CCME and in a couple of instances through inter-jurisdictional initiatives. For example, the Territories are working collectively on EPR in the North and B.C. and Manitoba are jointly working on best management practices related to compliance and enforcement. In general, however, the harmonization of provincial programs continues to be a largely unfulfilled dream and an area of frustration for producers and producer responsibility organizations which have to abide by provincial regulations and standards that have not aligned product lists or definitions, targets, key performance indicators and reporting requirements. The national tracking of waste diversion through EPR programs and comparing programs between jurisdictions also continues to be problematic.



Summary of Jurisdictions' Key EPR Characteristics



The table below illustrates the strengths and deficiencies of each jurisdiction against a number of key assessment factors in the three categories. The table is intended to show graphically the progress being made by the provinces in the areas of commitment, implementation and accountability.

- Green indicates the province has undertaken initiatives
- Red indicates the province has not undertaken initiatives

| | | NFLD | PEI | NS | NB | QB | ON | MB | SK | AB | BC |
|----------------|--|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|
| Commitment | Has the province committed to EPR? | Green | Green | Green | Green | Green | Green | Green | Green | Red | Green |
| | Does the province hold producers (directly or through a producer organization) responsible for designing, operating and financing programs for CCME's CAP Phase 1 materials: | | | | | | | | | | |
| | Packaging and printed materials | Red | Red | Red | Red | Red | Red | Red | Red | Red | Green |
| | Mercury containing lamps | Red | Green | Red | Red | Green | Red | Green | Red | Red | Green |
| | Thermostats | Red | Red | Red | Red | Red | Red | Green | Red | Red | Green |
| | Electronics and electrical products | Green | Green | Red | Red | Green | Green | Green | Green | Red | Green |
| | Paints and coatings | Green | Green | Green | Green | Green | Green | Green | Green | Red | Green |
| | Other household hazardous and special wastes | Red | Green | Red | Red | Green | Green | Green | Red | Red | Green |
| | Automotive products | Red | Green | Red | Red | Green | Green | Green | Green | Red | Green |
| | Does the province require that producers fund (some or all) municipal costs for packaging and printed paper programs? | Red | Red | Red | Red | Green | Green | Green | Green | Red | 1 |
| Implementation | Does the province enforce registration by obligated producers? | Green | Green | Green | Green | Green | Green | Green | Green | Green | Green |
| | Does the province periodically review its EPR legislation? | Red | Green | Green | Red | Green | Green | Green | Red | Red | Green |
| | Has the province implemented policies and practices to support their EPR programs such as: | | | | | | | | | | |
| | Landfill surcharge | Red | Green | Red | Red | Green | Red | Green | Red | Red | Red |
| | Disposal ban | Red | Green | Green | Red | Red | Red | Red | Red | Red | Red |
| Accountability | Does the province set performance targets? | Green | Red | Green | Green | Green | Green | Red | Red | Green | Green |
| | Does the province require that program performance data be audited by a third-party? | Red | Red | Red | Green | Green | Green | Red | Red | Green | Green |
| | Does the province impose penalties for failure to meet performance targets? | Red | Red | Red | Red | Green | Red | Red | Red | Red | Red |
| | Does the province require that annual reports be publicly available? | Green | Green | Green | Green | Red | Green | Green | Green | Green | Green |

Note 1: BC does not stipulate financing arrangements between producers and their supply chain, including municipalities.



EPR CANADA

www.eprcanada.ca

Email: info@eprcanada.ca

EPR MEMBERS:

Duncan Bury

Glenda Gies

Jo-Anne St. Godard

Don Jardine

Geoff Love

Barbara McConnell

Christina Seidel

What is EPR?

Extended producer responsibility (EPR) is defined by the Organization for Economic Co-operation and Development OECD as an environmental policy approach in which a producer's responsibility, physical and/or financial, for a product is extended to the post-consumer stage of the product's life cycle. This approach is the basis for the [Canadian Council of Ministers of the Environment's \(CAP\) for EPR](#). The plan identifies two phases, the first comprising seven material groups and the second comprising five material groups that regulatory jurisdictions should target for EPR.

Under EPR, producers are responsible for designing, operating and paying for programs to manage the products and packaging they supply into the marketplace at end of life. Producers, described as brand owners, manufacturers and first importers assume responsibility when users put the designated products and materials into the program's collection system.

(For an explanation of the differences between EPR and product stewardship, please visit [the EPRC website](#).)

ACKNOWLEDGEMENTS

Thank you to the many federal, provincial and territorial officials and political leaders for your time and effort to participate in this important initiative.

EPR Canada is pleased that this venture is gaining recognition year-by-year and we look forward to working with representatives and leaders in each jurisdiction to advance our common interests in this central area of environmental policy where Canada continues to be a world leader.



EMTERRA
Group



Merlin Plastics