

From: [Shoemaker, Wes ENV:EX](#)
To: ["Dimitri Pantazopoulos"; Foster, Doug FIN:EX](#)
Cc: [Cao, Shihang ENV:EX](#)
Subject: s.13
Date: Friday, December 23, 2016 11:26:42 AM
Attachments: S.13

Importance: High

Good morning Dimitri,

Sorry for the delay in getting back to you and I apologize for not being able to make a meeting work for Vancouver work this week. s.13

s.13

Attached you will find:

s.13

- A document entitled “***PPP Stewardship Plans – Regulatory & Policy Requirements and Options***” - to be used as a resource when considering the Newspaper Stewardship Plan development.

s.13

I believe you will find that although the redline version is deceptively revised in terms of formatting and language, the concepts you proposed are all still intact.

s.13

s.13

My staff are willing to work with and support the newspapers in the development of their plan and are ready to get going on this early in the new year.

I look forward to working with you and the rest of the Newspaper gang in the New Year.

Happy holidays,

Wes

W.H. (Wes) Shoemaker, MBA

Deputy Minister

Ministry of Environment

5th Floor, 2975 Jutland Road

Victoria, BC

Tel: 250.387.5429 | Fax: 250.387.6003

E-mail: wes.shoemaker@gov.bc.ca

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B.C. NEWSPAPERS RECYCLING PLAN
s.13

s.13

Formatted: English (Canada)

Page 04 to/à Page 14

Withheld pursuant to/removed as

s.13

From: [Shoemaker, Wes ENV:EX](#)
To: ["Dimitri Pantazopoulos"; Foster, Doug FIN:EX](#)
Cc: [Cao, Shihang ENV:EX](#)
Subject: s.13 and Newspaper Plan
Date: Friday, December 23, 2016 11:42:25 AM
Attachments: [News Plan Requirements V4.docx](#)

Dimitri,

I forgot to attached the ***PPP Stewardship Plans – Regulatory & Policy Requirements and Options*** document so here it is.

Wes

From: Shoemaker, Wes ENV:EX
Sent: Friday, December 23, 2016 11:27 AM
To: 'Dimitri Pantazopoulos'; Foster, Doug FIN:EX
Cc: Cao, Shihang ENV:EX
Subject: Newspaper Letter of Intent and Newspaper Plan
Importance: High

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PPP Stewardship Plans: Regulatory & Policy Requirements and Options

Purpose:

The purpose of this document is to provide general information to the newspaper sector that can assist in the development of a stewardship plan under the Packaging and Printed Paper category of the Recycling Regulation (the Regulation). s.13

s.13 Ministry staff expect to engage in further discussions as related details are finalized and plan development takes place.

The Regulation is considered to be the ultimate test to whatever plan is proposed by the newspaper sector. This informational document is for guidance and discussion purposes only and in no way is intended to fetter the decision-making ability of the Statutory Decision Maker (SDM).

Contents

1. Regulatory Requirements
2. PPP Policy Objectives
3. Stewardship Plan Development Options (sample plan links embedded in text)
4. Newspaper Stewardship Plan Development Options

1. Regulatory Requirements

Extended Producer Responsibility (EPR) programs are regulated by the Recycling Regulation, under the *Environmental Management Act*. The Regulation provides a results-based framework that outlines core requirements for producers/manufacturers with respect to managing their products at end-of-life.

The Regulation provides flexibility for industry, while maintaining provincial oversight. For the Packaging and Printed Paper (PPP) Category, Producers have two options to comply with the Regulation through a stewardship plan. They can create their own stewardship plan, or join an agency, which develops and administers a plan on their behalf. Producers can also comply with the Regulation through Part 3, which outlines a prescriptive set of requirements (not viewed as appropriate for this situation). If a producer or agency submits a stewardship plan, the plan must address the following outcome-based requirements (Section 5) of the Regulation prior to consideration for approval from the Ministry:

- ✓ Product recovery target(s)
- ✓ Collection system costs
- ✓ Consumer awareness
- ✓ Reasonable and free consumer access to collection facilities
- ✓ Life cycle management of products
- ✓ Dispute resolution
- ✓ Stakeholder consultation
- ✓ Management of products in adherence with the Pollution Prevention Hierarchy (Reduce, Reuse and Recycle in descending order of preference)

The Recycling Regulation Guide provides potential, new and existing producers with direction and assistance on meeting their obligations under the Regulation. Furthermore, the Ministry has developed a checklist (attached) that is a screening tool used by stewards and Ministry to determine the completeness of stewardship plans. The checklist is to be completed and submitted as a preface to the stewardship plan demonstrating that the stewardship plan includes information required under the Regulation, as well as recommendations provided through the *Recycling Regulation Guide*, and by Ministry staff directly.

2. PPP Policy Objectives

Once approved by the Director, a stewardship plan sets out the specific requirements that the stewardship agency must follow to remain compliant. As such, the first approved stewardship plan for a product category sets a regulatory precedent for a given product that affects all subsequent plans for the same product. Under the Regulation, any subsequent stewardship plan for a given product must consider “the product stewardship programs of other producers for products in the same product category” (section 5(2)(l)) and “the structure of financial and operational co-operation with other producers” (section 5(2)(m)). Several policy objectives that are unique to the PPP product category have also been established. In order to support a level playing field in this category, it is important for any stewardship plan subsequently submitted to the Ministry for the management of PPP, to adequately address these objectives:

- Producers are responsible for end of life management of the PPP they put into the household waste stream;
- PPP recycling rates across the province increase to 75 percent within five years;
- Establishment of stable and consistent PPP recycling programs province-wide, which includes;
 - Curbside collection, where curbside collection of PPP or garbage already occurs;
 - Multi-family building collection;
 - Depot collection;
- The right of first refusal for collection contracts is provided to local governments that previously provided curbside collection service prior to 2012;
- Program access is maintained and increased throughout the province as one or more additional stewardship plans are approved;
- The residential recycling experience is not negatively impacted but enhanced;
- The cost of recycling PPP shifts from the local taxpayer to the producers of PPP thereby:
 - Providing a direct incentive to producers of consumer goods to reduce or eliminate unnecessary packaging and printed paper; and,
 - Saving local government and taxpayers the cost of current programs.

The Ministry is currently pursuing analysis into the competitive landscape for PPP stewardship. With regard to competition, nothing prohibits any stewardship agency from submitting a competing PPP stewardship plan as currently allowed for under the Regulation. Following this analysis, the Ministry may be developing further policy objectives and/or regulatory amendments for stakeholder consultation. This may include implications to ‘standalone’ stewardship plans that compete directly in a common product category, and will need to be addressed by any such plans.

3. Stewardship Plan Development Options

To address the outcome based requirements of Section 5 of the Regulation, a producer or agency has two main options for developing a stewardship plan:

- A. Standalone Plan
- B. Cooperative Plan

A. Standalone Plan

This type of plan addresses all of the regulatory requirements in Section 5, with little to no reliance on other stewardship programs. The agency will undertake the development of a variety of program components, including but not limited to, establishing a collection network, undertaking promotion and education, effectively managing the collected material in accordance with the pollution prevention hierarchy, and conducting independent third-party audits of program performance.

For the newspaper sector to develop this type of plan, it would need to develop a plan for its members that did not primarily rely on the existing MMBC program and instead established a system that essentially met or surpassed the MMBC program performance measures (e.g. adequate consumer access through curbside, multi-family and depot services that is provided through no collaboration with MMBC). All the regulatory requirements and PPP policy objectives would also need to be clearly met in the plan for it to be approved by a statutory decision maker.

B. Cooperative Plan

A typical cooperative plan is essentially the same as a standalone plan, in that a producer or agency develops a plan and submits it to the Director for approval. However, it differs from a standalone plan, in that it is designed to rely (lightly or heavily) on components of a pre-existing stewardship program. There are several stewardship programs that are designed in this way (see list below). When agencies cooperate in this way, they typically establish internal commercial agreements with one another that outline a framework for compensation.

- Electronics Products Recycling Association Schedule 3 Stewardship Plan
Section 4.0 Consumer Access to Collection Facilities (pg. 6) - *Since commencing operation in 2007, the Program has established a comprehensive network of permanent collection sites where the public can conveniently return electronics for responsible recycling. This network consists of a group of Return-it™ Depots operated by Encorp Pacific, regional government locations, not-for profit organizations and provincial government locations.*
- Brewers Recycled Container Collection Council (BRCCC) Schedule 5 Stewardship Plan
Coordination and Cooperation with other stewardship programs (pg. 17) - *There may be some volumes of BRCCC secondary packaging (primarily boxboard) entering other Schedule 5 collection systems. BRCCC is actively working with MMBC to audit common return locations to identify flows of beer secondary packaging. BRCCC will coordinate with these stewardship programs, including financially, as necessary to ensure overall recovery performance and efficiency. BRCCC will ensure any issues between stewardship programs does not negatively impact the recovery and recycling of relevant secondary packaging. No recovered packaging will be double-counted between the various stewardship programs.*

Such a plan by the newspaper sector would be the most extreme plan of its nature submitted to date i.e. it will virtually rely entirely on the MMBC plan to meet its regulatory obligations. Therefore it is not envisioned that a traditional cooperative plan would be submitted (as it would essentially be a copy of the MMBC plan or continual reference to the MMBC plan throughout), but rather the 'plan' would be

more of an explanation of how the newspaper sector intends to fulfill its regulatory obligations through an existing plan.

4. Newspaper Stewardship Plan Development Options

The newspaper sector can choose to develop either type of stewardship plan noted above.

A cooperative plan from the newspaper sector could also indicate a preferred or intended future direction e.g. creation of a standalone plan, but this would be subject to approval of a future plan amendment. Such an amendment would detail key areas e.g. a cooperative transition strategy, how there would be no 'backsliding' or compromising of the consumer experience, and how it would meet future policy objectives stemming from the Competition study, as this would be a directly competing plan.

If the newspaper sector is interested in developing a cooperative plan, which heavily utilizes the existing collection system for PPP operated by MMBC, it will need to identify how it intends to do so in its plan. The degree to which such a relationship between the MoE, the Newspaper Sector and MMBC is profiled in the plan itself is still to be defined, although a SDM must be provided with enough information and assurances regarding how the plan will function, to be able to approve such a plan.

Key components of a newspaper sector cooperative stewardship plan may include, but are not limited to:

- Explanation to the SDM as to the submission an unconventional 'plan' that has the same effect as the newspaper sector being a member of MMBC and being fully compliant, yet it is not a member, has no direct contractual relationship with MMBC, and therefore has submitted an unconventional plan for approval. This could reference the financial challenges facing the newspaper sector and limited capacity to pay MMBC fees directly, therefore a more practical approach is being proposed that involves a third party that is willing to make use of a combination of cash and VIK from the newspaper sector, and in-turn compensate MMBC at the standard market rate charged for its services. This helps provide the SDM (and stakeholders) with appropriate context and reasoning, and assurance that key regulatory obligations are still being met e.g. existing services levels, the producer is paying the full cost of collection, etc. but does not disclose any further specifics or arrangements.
- Clear indication that the newspaper plan intends to rely on all components of the current stewardship program for PPP (i.e. MMBC), but adequate consultation will still take place.
- A letter from MMBC, indicating that it is continuing to manage all PPP materials – including newspapers, in accordance with its stewardship plan, and this is being done through an arrangement by which MMBC is a willing participant in support of the newspaper plan.
- Inclusion of a recovery rate (product sold/product collected) target for newspaper material (subject to annual reporting and third party verification requirements – to be undertaken by the newspaper sector, not MMBC)

The above regulatory requirements and plan components will need to be further addressed through direct discussions between Ministry staff and the newspaper sector. Such assistance is provided to all current and potential stewards in order to develop plans that can be recommended for SDM approval.

Note:

- Based on current understanding, the newspaper sector would not be members of the current stewardship program for PPP and would develop its own stewardship plan that is reliant on the MMBC plan. As a result, the newspaper sector would have little influence over MMBC (due to the fact that there is no membership agreement between the two entities in effect). If MMBC was not effectively collecting newsprint material, the newspaper plan would be affected and would have no direct options for recourse with MMBC. Short of the newspaper sector having any other contractual relationships in place with MMBC, it would have to implement a contingency plan that demonstrated to the Province that effective end of life management of newsprint would continue, but through an alternative means e.g. development of a standalone plan. This 'fallback' will also need to be conveyed in a stewardship plan.

From: [Shoemaker, Wes ENV:EX](#)
To: ["Dimitri Pantazopoulos"; Foster, Doug FIN:EX](#)
Cc: [Cao, Shihang ENV:EX](#)
Subject: s.13 and Newspaper Plan
Date: Friday, December 23, 2016 12:00:30 PM

Okay our offices in Vancouver at Canada Place.

Wes

From: Dimitri Pantazopoulos [<mailto:dimitri@mapleleafstrategies.com>]
Sent: Friday, December 23, 2016 11:58 AM
To: Shoemaker, Wes ENV:EX; Foster, Doug FIN:EX
Cc: Cao, Shihang ENV:EX
Subject: s.13 and Newspaper Plan

That should work.

Let's go with your office since I MAY not be able to attend. I may have to go to Toronto for another client.

Merry Christmas.

dp

From: "Shoemaker, Wes ENV:EX" <Wes.Shoemaker@gov.bc.ca>
Date: Friday, December 23, 2016 at 11:53 AM
To: Dimitri Pantazopoulos <dimitri@mapleleafstrategies.com>, "Foster, Doug FIN:EX" <Doug.Foster@gov.bc.ca>
Cc: "Cao, Shihang ENV:EX" <Shihang.Cao@gov.bc.ca>
Subject: s.13 and Newspaper Plan

She had 10 am. Let me know if that will work and if not, we can juggle.

Wes

From: Dimitri Pantazopoulos [<mailto:dimitri@mapleleafstrategies.com>]
Sent: Friday, December 23, 2016 11:52 AM
To: Shoemaker, Wes ENV:EX; Foster, Doug FIN:EX
Cc: Cao, Shihang ENV:EX
Subject: Re: Newspaper Letter of Intent and Newspaper Plan
Do we have a time on hold?

From: "Shoemaker, Wes ENV:EX" <Wes.Shoemaker@gov.bc.ca>
Date: Friday, December 23, 2016 at 11:50 AM
To: Dimitri Pantazopoulos <dimitri@mapleleafstrategies.com>, "Foster, Doug FIN:EX" <Doug.Foster@gov.bc.ca>
Cc: "Cao, Shihang ENV:EX" <Shihang.Cao@gov.bc.ca>
Subject: s.13 : and Newspaper Plan

Yup. I see that my assistant had put a hold in my calendar for that date. Assume it will be a Canada Place at your office or it can be in ours on the 6th floor. I will make sure the appropriate staff will accompany me to speak to the technical requirements of the compliance plan. I will also check to see if Doug can join us any discussions s.13

Wes

From: Dimitri Pantazopoulos [<mailto:dimitri@mapleleafstrategies.com>]

Sent: Friday, December 23, 2016 11:46 AM
To: Shoemaker, Wes ENV:EX; Foster, Doug FIN:EX
Cc: Cao, Shihang ENV:EX
Subject: s.13 and Newspaper Plan
Thanks Wes.

I was hoping we could arrange a face to face on Jan 9. This will give the client and their lawyers time to review and then hopefully we could push through an agenda.

Does that day work at all for you?

dp

From: "Shoemaker, Wes ENV:EX" <Wes.Shoemaker@gov.bc.ca>
Date: Friday, December 23, 2016 at 11:42 AM
To: Dimitri Pantazopoulos <dimitri@mapleleafstrategies.com>, "Foster, Doug FIN:EX" <Doug.Foster@gov.bc.ca>
Cc: "Cao, Shihang ENV:EX" <Shihang.Cao@gov.bc.ca>
Subject: s.13 and Newspaper Plan

Dimitri,

I forgot to attached the ***PPP Stewardship Plans – Regulatory & Policy Requirements and Options*** document so here it is.

Wes

From: Shoemaker, Wes ENV:EX
Sent: Friday, December 23, 2016 11:27 AM
To: 'Dimitri Pantazopoulos'; Foster, Doug FIN:EX
Cc: Cao, Shihang ENV:EX
Subject: s.13 and Newspaper Plan
Importance: High

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From: [Shoemaker, Wes ENV:EX](#)
To: ["Dimitri Pantazopoulos"; Foster, Doug FIN:EX](#)
Cc: [Cao, Shihang ENV:EX](#)
Subject: s.13 and Newspaper Plan
Date: Friday, January 6, 2017 9:16:42 AM

Dimitri,

Checklist will be sent to you this morning. As for the SDM, that has not yet been determined. Lately, the ADM has been the one making decisions on stewardship plans. If not him, then it will be another senior employee within the Environmental Protection Division.

Wes

From: Dimitri Pantazopoulos [mailto:dimitri@mapleleafstrategies.com]
Sent: Thursday, January 5, 2017 6:10 PM
To: Shoemaker, Wes ENV:EX; Foster, Doug FIN:EX
Cc: Cao, Shihang ENV:EX
Subject: s.13 and Newspaper Plan

Folks,

The "PPP Stewardship Plans" document references a "Checklist" in the first para of page 2. That appears to be missing, or am I missing something.

Second, can you please let me know who the statutory decision-makers are – in terms of names, titles and structure of the decision authority?

Thanks,

dp

Dimitri Pantazopoulos | Partner
Maple Leaf Strategies
Government Relations | Public Affairs | Research
520-999 Canada Place
Vancouver, BC V6C 3E1
(250) 588-1345
dimitri@mapleleafstrategies.com
www.mapleleafstrategies.com

From: "Shoemaker, Wes ENV:EX" <Wes.Shoemaker@gov.bc.ca>
Date: Friday, December 23, 2016 at 11:42 AM
To: Dimitri Pantazopoulos <dimitri@mapleleafstrategies.com>, "Foster, Doug FIN:EX" <Doug.Foster@gov.bc.ca>
Cc: "Cao, Shihang ENV:EX" <Shihang.Cao@gov.bc.ca>
Subject: s.13 : and Newspaper Plan

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From: Shoemaker, Wes ENV:EX
Sent: Friday, December 23, 2016 11:27 AM
To: 'Dimitri Pantazopoulos'; Foster, Doug FIN:EX
Cc: Cao, Shihang ENV:EX

Subject: s.13
Importance: High

and Newspaper Plan

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November 1, 2010.

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From: [Minister, ENV ENV:EX](#)
To: ["nfriesen@abbotsford.ca"](mailto:nfriesen@abbotsford.ca)
Cc: ["sbarker@fvrd.bc.ca"](mailto:sbarker@fvrd.bc.ca); [Lewis, Cameron F ENV:EX](#)
Subject: RE: Correspondence from Mayors of Abbotsford, Chilliwack and Mission to Minister Polak re: Provincial Packaging and Printed Paper Program
Date: Tuesday, August 4, 2015 1:35:19 PM
Attachments: [Ltr to Minister Polak re Provincial Packaging Printed Paper Program.may20.2015.pdf](#)

Reference: 284288
August 4, 2015

His Worship Mayor Henry Braun
City of Abbotsford
His Worship Mayor Randy Hawes
District of Mission
Her Worship Mayor Sharon Gaetz
City of Chilliwack

c/o Nancy Friesen
Email: nfriesen@abbotsford.ca

Dear Mayors Braun, Hawes and Gaetz:

Thank you for your email and attached letter of May 19, 2015, regarding the provincial packaging and printed paper program (PPP) and Multi- Material British Columbia (MMBC). I apologize for the delay in responding.

Thank you as well for taking the time to meet with me this past April. I also understand that you and regional staff recently had the opportunity to meet with our new Executive Director of the Waste Prevention Branch, Mr. Cameron Lewis. He passed on highlights of your discussions, and I am pleased to hear that the local municipalities are continuing to work collaboratively to find solutions to align your recycling programs with the services provided by MMBC as quickly as possible.

I would also like to reinforce that the ministry will continue to work diligently with MMBC to ensure they meet the objectives outlined in their approved stewardship plan and achieve compliance with the requirements of the Recycling Regulation.

As you can appreciate, this is the largest and most complex extended producer responsibility program ever implemented in British Columbia (BC), with MMBC estimating the cost to producers for a fully implemented system of \$80 to \$100 million annually. However, because there are several communities that have not yet received this benefit, my ministry is dedicating a significant amount of resources to seeing this program completed as soon as possible. In fact, aside from establishing a stand-alone Waste Prevention Branch this past spring to directly oversee stewardship programs, I can report that by pursuing all 'free-riding' producers to become part of this program, this in itself has become one of the largest, most concerted compliance and enforcement initiatives of the ministry in recent history, targeting hundreds of companies and resulting in MMBC securing \$4.4 million in outstanding PPP producer fees to date.

Compliance and enforcement is one several aspects the ministry is working on to ensure the realization of producer-funded PPP services in all communities. As our compliance efforts are projected to be nearing substantial completion by year end, I expect better understand exactly how and when these services will be provided at that time.

Thank you again for taking the time to write. I anticipate we will have a chance to further discuss progress to date at the UBCM convention this fall.

Sincerely,

Mary Polak

Minister

cc: Cameron Lewis, Executive Director, Waste Prevention Branch, Environmental Protection Division, Ministry of Environment

Stacey Barker, Manager of Environmental Services, Fraser Valley Regional District

From: Nancy Friesen [<mailto:NFriesen@abbotsford.ca>]

Sent: Tuesday, May 19, 2015 1:27 PM

To: Minister, ENV ENV:EX

Cc: Mayor Gaetz; Mayor Hawes

Subject: Correspondence from Mayors of Abbotsford, Chilliwack and Mission to Minister Polak re: Provincial Packaging and Printed Paper Program

Good afternoon Minister Polak,

Attached please find correspondence from Mayor Braun, City of Abbotsford, Mayor Gaetz, City of Chilliwack, and Mayor Hawes, District of Mission regarding Provincial Packaging and Printed Paper Program.

The original to follow in the mail.

With kind regards,

Nancy

Nancy Friesen

Executive Assistant to Mayor

Tel: 604.864.5500 Fax: 604.853.1934

Email: nfriesen@abbotsford.ca



32315 South Fraser Way
Abbotsford, BC V2T 1W7
www.abbotsford.ca



May 19, 2015

File: 5360-40-01

Email: env.minister@gov.bc.ca

Honourable Mary Polak
Minister of Environment
Parliament Buildings
PO Box 9047, Stn Prov Govt
Victoria, BC V8W 9E2

Dear Minister Polak:

Re: Provincial Packaging and Printed Paper Program

Thank you for taking time from your busy schedule to meet with us regarding our frustrations about the Multi-Material British Columbia (MMBC) program.

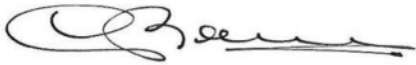
As we conveyed to you, we feel this program is highly unfair to our residents as they are essentially paying twice for recycling the same products. We also are concerned that MMBC has regional goals to meet, yet do not pay for any recycling in the Fraser Valley.

We were extremely pleased to hear that you have a new Executive Director responsible for this program and we look forward to working with him on a solution to these concerns.

As this issue affects all members of the Fraser Valley Regional District, we request that Stacey Barker, Manager of Environmental Services, be our point person for this matter. She can be reached at 1.604.702.5096 (toll free: 1.800.528.0061), or via email: sbarker@fvrd.bc.ca. She is looking forward to contact from your Executive Director to commence this process. We would very much appreciate a meeting with you and Allen Langdon of MMBC this fall at UBCM to receive an update on potential changes to this system.

Again, thank you for meeting with us and acknowledging our frustrations and the need to correct anomalies relating to this program.

Yours truly,



Henry Braun
Mayor,
City of Abbotsford



Randy Hawes
Mayor,
District of Mission



Sharon Gaetz
Mayor,
City of Chilliwack

c. Stacey Barker, Manager of Environmental Services, FVRD

City of Abbotsford: 32315 South Fraser Way, Abbotsford, BC V2T 1W7
District of Mission: 8645 Stave Lake Street, PO Box 20, Mission, BC V2V 4L9
City of Chilliwack: 8550 Young road, Chilliwack, BC V2P 8A4

From: [Lewis, Cameron F ENV:EX](#)
To: [Zacharias, Mark ENV:EX](#); [Kapac de Frias, Martina E ENV:EX](#)
Subject: RE: Brewers
Date: Wednesday, October 14, 2015 7:45:00 AM

My cell is 250-213-6882 if you do want to connect.

Cameron Lewis

Executive Director, Waste Prevention

Environmental Protection Division, Ministry of Environment

250-953-3866

From: Zacharias, Mark ENV:EX
Sent: Wednesday, October 14, 2015 7:45 AM
To: Lewis, Cameron F ENV:EX; Kapac de Frias, Martina E ENV:EX
Subject: Re: Brewers
Martina

Pls see note from Cameron below and drop him a line of any questions.

Regards, Mark

250-415-6466

On Oct 14, 2015, at 7:38 AM, Lewis, Cameron F ENV:EX <Cameron.Lewis@gov.bc.ca> wrote:

Mark,

The MO didn't give any details on their meeting today, but in case they are meeting with representatives from AG/LDB, if your time permits, I wouldn't mind giving you some colour commentary behind the BN. Not critical, but may be helpful to MO.

Cameron Lewis

Executive Director, Waste Prevention

Environmental Protection Division, Ministry of Environment

250-953-3866

From: [Lewis, Cameron F ENV:EX](#)
To: [Kapac de Frias, Martina E ENV:EX](#); [Zacharias, Mark ENV:EX](#)
Cc: [Gooderham, Coleen E ENV:EX](#)
Subject: RE: Brewers
Date: Wednesday, October 14, 2015 9:58:00 AM

I can be available at 11

Cameron Lewis

Executive Director, Waste Prevention

Environmental Protection Division, Ministry of Environment

250-953-3866

From: Kapac de Frias, Martina E ENV:EX
Sent: Wednesday, October 14, 2015 9:57 AM
To: Lewis, Cameron F ENV:EX; Zacharias, Mark ENV:EX
Subject: RE: Brewers
Can we chat at 11 pls?

From: Lewis, Cameron F ENV:EX
Sent: Wednesday, October 14, 2015 7:46 AM
To: Zacharias, Mark ENV:EX; Kapac de Frias, Martina E ENV:EX
Subject: RE: Brewers

My cell is 250-213-6882 if you do want to connect.

Cameron Lewis

Executive Director, Waste Prevention

Environmental Protection Division, Ministry of Environment

250-953-3866

From: Zacharias, Mark ENV:EX
Sent: Wednesday, October 14, 2015 7:45 AM
To: Lewis, Cameron F ENV:EX; Kapac de Frias, Martina E ENV:EX
Subject: Re: Brewers

Martina

Pls see note from Cameron below and drop him a line of any questions.

Regards, Mark

250-415-6466

On Oct 14, 2015, at 7:38 AM, Lewis, Cameron F ENV:EX <Cameron.Lewis@gov.bc.ca> wrote:

Mark,

The MO didn't give any details on their meeting today, but in case they are meeting with representatives from AG/LDB, if your time permits, I wouldn't mind giving you some colour commentary behind the BN. Not critical, but may be helpful to MO.

Cameron Lewis

Executive Director, Waste Prevention

Environmental Protection Division, Ministry of Environment

250-953-3866

From: [Lewis, Cameron F ENV:EX](#)
To: [Kapac de Frias, Martina E ENV:EX](#)
Cc: [Zacharias, Mark ENV:EX](#); [Goederham, Coleen E ENV:EX](#)
Subject: RE: Brewers
Date: Wednesday, October 14, 2015 10:02:00 AM

Sounds good.

Cameron Lewis

Executive Director, Waste Prevention

Environmental Protection Division, Ministry of Environment

250-953-3866

From: Kapac de Frias, Martina E ENV:EX
Sent: Wednesday, October 14, 2015 10:02 AM
To: Lewis, Cameron F ENV:EX
Cc: Zacharias, Mark ENV:EX; Goederham, Coleen E ENV:EX
Subject: Re: Brewers
Thanks ill call your cell.

On Oct 14, 2015, at 9:58 AM, Lewis, Cameron F ENV:EX <Cameron.Lewis@gov.bc.ca> wrote:

I can be available at 11

Cameron Lewis

Executive Director, Waste Prevention

Environmental Protection Division, Ministry of Environment

250-953-3866

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Cameron Lewis

Executive Director, Waste Prevention

Environmental Protection Division, Ministry of Environment

250-953-3866

From: [Lewis, Cameron F ENV:EX](#)
To: [Kapac de Frias, Martina E ENV:EX](#); [Zacharias, Mark ENV:EX](#)
Cc: [Knudsen, Mark ENV:EX](#); [Denniston, Tristan M MEM:EX](#)
Subject: RE: PPP Advisory letters
Date: Wednesday, December 16, 2015 2:49:00 PM
Attachments: [293338 Producer Advisory PPP Dec 2015.docx](#)

Here it is Martina.

Cameron Lewis

Executive Director, Waste Prevention

Environmental Protection Division, Ministry of Environment

250-953-3866

From: [Kapac de Frias, Martina E ENV:EX](#)
Sent: Wednesday, December 16, 2015 2:41 PM
To: [Zacharias, Mark ENV:EX](#); [Lewis, Cameron F ENV:EX](#)
Cc: [Knudsen, Mark ENV:EX](#); [Denniston, Tristan M ENV:EX](#)
Subject: RE: PPP Advisory letters
Can we see the letter template please?

From: [Zacharias, Mark ENV:EX](#)
Sent: Wednesday, December 16, 2015 2:17 PM
To: [Lewis, Cameron F ENV:EX](#); [Kapac de Frias, Martina E ENV:EX](#)
Cc: [Knudsen, Mark ENV:EX](#); [Denniston, Tristan M ENV:EX](#)
Subject: Re: PPP Advisory letters
Martina:

Pls let Cameron and I know if you have any concerns with the approach below.

Regards, Mark
250-415-6466

On Dec 16, 2015, at 1:50 PM, Lewis, Cameron F ENV:EX <Cameron.Lewis@gov.bc.ca> wrote:

Mark,

Shortly, we'll be sending out about 1100 advisory letters to potential producers of PPP. These are the polite first contact letters. These are primarily small/medium businesses, many of which will likely prove to be exempt from the Recycling Regulation due to their size, and collectively they likely do not account for very significant MMBC fees. However, contacting and clearing up remaining potential producers is important for program consistency, level playing field, etc. Louise has provided additional context bullets below.

We can wait a couple days before initiating the mailout with BC Mail if you'd like to give MO a heads up or anything, but I don't think there are any issues or concerns with this. It's be good to be able to say we got them underway before the end of 2016.

Just let me know. Thanks Mark.

Cameron Lewis

Executive Director, Waste Prevention

Environmental Protection Division, Ministry of Environment

From: LeBoutillier, Louise ENV:EX

Sent: Friday, December 11, 2015 4:43 PM

To: Lewis, Cameron F ENV:EX; McDonald, Bob ENV:EX

Cc: Jones, Leeanne ENV:EX; Harris, Lucas ENV:EX

Subject: Bullets: PPP Compliance and Enforcement, Advisory 006

Importance: High

As discussed earlier, bullets below regarding the Advisory Letter (Batch 006) to be sent out to remaining potentially non-compliant producers of PPP in BC.

- As per Ministry's Compliance and Enforcement Plan for PPP (July 2014), Ministry anticipates that compliance and enforcement measures on behalf of the Ministry will be substantially complete by the end of 2015; after this there will be an increased focus on maintenance required for smaller and/or new producers entering the marketplace.
- As part of the maintenance portion of Ministry's Plan, an Advisory letter is slated to be sent out to approximately 1,100 businesses in BC that are potentially obligated producers of PPP under Schedule 5 of BC's Recycling Regulation
- Since December 2013, Ministry has sent 5 previous batches of Advisory Letters; the largest comprising approximately 550 BC businesses.
- To date, Ministry compliance efforts have focused on escalated action against large producers that contribute significant tonnages of PPP products into the waste stream, therefore contributing more funds toward operating MMBC's program.
- With the majority of larger businesses contacted, Ministry is now focusing its efforts on small- to medium-sized potentially obligated producers in an effort to ensure all potentially impacted BC businesses are aware of their obligation; this fits with Ministry's mandate to ensure a level playing field for all businesses in BC.
- Advisory letters are a first point of contact for the Ministry to these businesses; they are non-threatening in tone and have historically been an effective tool in opening up a dialogue between producers and the regulator; Ministry staff and MMBC will work with businesses to determine whether or not they are obligated under the Regulation, and provide information on the steps necessary to become compliant.
- It is likely some of the businesses receiving this Advisory letter may prove to be not obligated under the Small Business Exemption Policy; the Advisory letter essentially allows communication between Ministry and potentially obligated producers to make this determination without committing FTE time to conducting research on individual producers to determine their obligation.
- Having more producers register, report and pay fees towards the MMBC program provides MoE program area staff with a more fulsome understanding of the overall status of MMBC's program; this is anticipated to aid MoE in evaluating MMBC's program performance and assist staff in working with MMBC to expand collection service to BC residents, thus fulfilling their mandate to provide province-wide service to the public.

- This list of producers has been identified by MMBC, and none of these producers has previously received any correspondence from MoE.
- MMBC has provided the following methodology for how they identified the producers included in the list of prospects:
 - Company names that have been identified to MMBC by existing Members
 - Flyers/billboards/advertising received or viewed by MMBC employees
 - Businesses identified by MMBC team as operating in BC, through local knowledge
 - Businesses that report in other provincial programs (for example, Ontario) and are also located in BC
 - List of BC Franchisees
 - Search by MMBC staff of BC based businesses in the same sector as existing MMBC members
- MMBC's list of prospects was cross-checked where possible to remove duplicates, companies that have already reported, businesses that MoE has already sent Advisory or Warning letters to, self-identified small businesses and companies that have informed MMBC that they only operate within the commercial environment (i.e. they do not produce PPP that ends up in the residential waste stream).
- Historically, many obligated producers contacted via Advisory letters were simply unaware of the regulatory requirements and came into compliance as a result of the outreach provided through the advisory letter.

Please let me know if you need anything further (i.e. – a redux of all C&E stats so far).

Special thanks to Leeanne for pulling some of this together ^{s.22}
s.22

Cheers,

Louise

Louise LeBoutillier
Compliance Officer | Industry Product Stewardship
Waste Prevention Branch
Ministry of Environment
Louise.LeBoutillier@gov.bc.ca
3rd Floor – 2975 Jutland Road | Victoria, BC | V8T 5J9 | ☎ 250.356.5413

 Please consider the environment before printing this e-mail



REGISTERED MAIL

File: 293338

December 15, 2015

«Contact»
«Position»
«Full_legal_Name»
«Address_1»
«Address_2»
«City», «Prov__State» «Postal»
«Country»

Dear «Contact»:

This letter is to advise that «Full_legal_Name» may be subject to obligations under the Recycling Regulation (B.C. Reg. 449/2004) as it pertains to the distribution of packaging and printed paper in the province of British Columbia. As of May 2014, the Recycling Regulation (the Regulation) requires that the producers (manufacturers, distributors, or importers) of packaging and printed paper (PPP) be responsible for the management of their products at all lifecycle stages, including post-consumer collection, disposal or recycling.

In order to sell or distribute products in the packaging and printed paper product category in British Columbia, producers must have an approved Product Stewardship Plan. Section 2(2) of the Regulation however, provides a producer with the option of appointing an agency with an approved plan to discharge its obligations under the Regulation. Multi-Material BC (MMBC) is a not-for-profit organization that is the only agency with an approved Stewardship Plan for managing these materials in British Columbia.

It has come to the attention of the Ministry of Environment that «Full_legal_Name» sells or distributes products within the packaging and printed paper product category in the Regulation and therefore may be a producer of PPP, as defined in Section 2 (Part 1) of the Regulation. If «Full_legal_Name» is a producer, please advise this office immediately how you intend to meet your obligations under Section 2 of the Regulation. If «Full_legal_Name» is not a producer, please advise this office immediately of the reasons for this determination. Alternatively, if «Full_legal_Name» has come into compliance with the Recycling Regulation since the issuance of this letter, please advise this office immediately.

It is the Ministry's intention to ensure that producers fulfil their obligation and fully comply with the Recycling Regulation. Ministry enforcement responses are guided by the Ministry's Compliance and Enforcement Policy which can be found on the Ministry's website.

.../2

The Ministry appreciates that this information may be new to your company. If you would like additional information, please feel free to contact me by telephone at: 250-356-5413, or by email at: Louise.LeBoutillier@gov.bc.ca. Ministry staff would be pleased to work with you to help determine whether or not «Full_legal_Name» is obligated under the Regulation and how best to discharge those obligations.

Yours truly,

Louise LeBoutillier
Compliance Officer
Industry Product Stewardship, Waste Prevention Branch
Ministry of Environment

pc: Cameron Lewis, Executive Director, Waste Prevention Branch

Who is a Producer and what is Packaging and Printed Paper?

Under the Regulation, a company is defined as a producer if it distributes products with packaging or distributes printed paper that makes its way into the residential waste stream (e.g. curbside “Blue Box”) in British Columbia. Examples of materials included are: take-out food containers; flyers; letters; receipts; tags; cardboard and boxboard packaging; plastic wrap; glass or plastic containers; foam trays; tin cans; and plastic or paper bags (please note that this does NOT include material that ends up in the institutional, commercial or industrial waste stream). Please refer to Schedule 5 of the Regulation for specifics on PPP. You can find a link to the Regulation, as well as information regarding Product Stewardship in British Columbia, and the PPP product category on the Ministry’s website.

Are there exemptions for small businesses?

The Regulation provides exemptions for small businesses if they meet any of the following four criteria:

- Generate less than one million dollars in annual revenues.
- Generate less than one tonne of PPP supplied to BC residents.
- Operate as a single point of retail sale and are not supplied by or operated as part of a franchise.
- Are a registered charity.

Furthermore, MMBC provides small-to-medium-sized businesses the option of an annual flat fee if the business is a low-volume producer of packaging and printed paper. Businesses producing between one and five tonnes can pay a pre-determined recycling fee, saving the administrative costs of detailed reporting.

From: [Lewis, Cameron F ENV:EX](#)
To: [Kapac de Frias, Martina E ENV:EX](#)
Cc: [Zacharias, Mark ENV:EX](#); [Knudsen, Mark ENV:EX](#); [Denniston, Tristan M MEM:EX](#)
Subject: Re: PPP Advisory letters
Date: Thursday, December 17, 2015 12:20:25 PM

Thanks Martina.

Sent from my iPhone

On Dec 17, 2015, at 11:18 AM, Kapac de Frias, Martina E ENV:EX
<Martina.KapacdeFrias@gov.bc.ca> wrote:

Thank you, no concerns from our end. M

On Dec 16, 2015, at 2:49 PM, Lewis, Cameron F ENV:EX
<Cameron.Lewis@gov.bc.ca> wrote:

Here it is Martina.

Cameron Lewis

Executive Director, Waste Prevention

Environmental Protection Division, Ministry of Environment

250-953-3866

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Cc: Knudsen, Mark ENV:EX; Denniston, Tristan M ENV:EX
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Can we see the letter template please?

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Cameron Lewis

Executive Director, Waste Prevention

Environmental Protection Division, Ministry of
Environment

250-953-3866

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Sent: Friday, December 11, 2015 4:43 PM

To: Lewis, Cameron F ENV:EX; McDonald, Bob ENV:EX

Cc: Jones, Leeanne ENV:EX; Harris, Lucas ENV:EX

Subject: Bullets: PPP Compliance and Enforcement, Advisory 006

Importance: High

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<!--[if !supportLists]-->• <!--[endif]-->As per Ministry's Compliance and Enforcement Plan for PPP (July 2014), Ministry anticipates that compliance and enforcement measures on behalf of the Ministry will be substantially complete by the end of 2015; after this there will be an increased focus on maintenance required for smaller and/or new producers entering the marketplace.

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redux of all C&E stats so far).

Special thanks to Leeanne for pulling some of this together s.22


Cheers,

Louise

Louise LeBoutillier
Compliance Officer | Industry Product Stewardship
Waste Prevention Branch

Ministry of Environment

Louise.LeBoutillier@gov.bc.ca

3rd Floor – 2975 Jutland Road | Victoria, BC | V8T 5J9 | 
250.356.5413

 Please consider the environment before printing this e-mail

<293338 Producer Advisory PPP_Dec 2015.docx>

Page 19

Withheld pursuant to/removed as

s.14;s.13

From: [Lewis, Cameron F ENV:EX](#)
To: [Knudsen, Mark ENV:EX](#)
Cc: [McDonald, Bob ENV:EX](#)
Subject: Newspapers Proposal to MMP - s.13,s.14
Date: Monday, January 25, 2016 11:09:00 AM

Hi Mark,

I just spoke to Mark Z. Two quick things:

1. He asked me to follow up with you to see if you might be able to send over the proposal document that the newspaper publishers gave to MMP last week?

s.13,s.14

Thanks a lot!

Cameron Lewis

Executive Director, Waste Prevention

Environmental Protection Division, Ministry of Environment

250-953-3866

From: [Kapac de Frias, Martina E ENV:EX](#)
To: [Karn, David GCPE:EX](#)
Cc: [GCPE Communications - Environment](#); [Lewis, Cameron F ENV:EX](#); [Shoemaker, Wes AGRI:EX](#); [Knudsen, Mark ENV:EX](#); [Shiff, Alexander ENV:EX](#); [Koolsbergen, Nick GCPE:EX](#); [Gordon, Matt GCPE:EX](#)
Subject: RE: media request - Nelson Star - MMBC newspaper industry
Date: Monday, March 14, 2016 10:37:01 AM

Move the last bullet to the top - then good to go – thanks, M

From: Karn, David GCPE:EX
Sent: Monday, March 14, 2016 9:46 AM
To: Kapac de Frias, Martina E ENV:EX
Cc: GCPE Communications - Environment; Lewis, Cameron F ENV:EX; Shoemaker, Wes ENV:EX; Knudsen, Mark ENV:EX; Shiff, Alexander ENV:EX; Koolsbergen, Nick GCPE:EX; Gordon, Matt GCPE:EX
Subject: media request - Nelson Star - MMBC newspaper industry

Martina,

approved by Cameron Lewis acting ADM

reporter: Bill Metcalfe, Nelson Star reporter4@nelsonstar.com 250) 352-1890

deadline: Monday 11am

request: The newspaper industry appears to be in violation of its responsibility under the recycling regulations to pay for the recycling of its paper. Why does the ministry not require the industry to join the MMBC program?

Background:

The Regional District of Central Kootenay (RDCK) wants MMBC to provide recycling services for its rural areas, but MMBC says it can't take on more communities because it can't afford it until the newspaper industry joins the MMBC program and starts paying MMBC to do its recycling. MMBC says the newspaper industry is in violation of its responsibilities under the Environment ministry's recycling regulations. The RDCK board has been lobbying the minister to somehow force the newspaper industry to get on board but they are getting no response.

FYI: reporter has spoken to MMBC and would like to hear from the province.

Suggested response:

- To-date, 152 distinct communities are being serviced by MMBC and benefitting from approximately \$55 million in direct tax relief provided by industry assuming the approximate \$85 million cost of the current system.
- MMBC is now providing curbside and multi-family recycling services to over 1.24 million households (73% of B.C. households) and depot access to 1.69 million households (96% of B.C. households) – many communities have curbside and depot services.
- Twenty BC communities are now receiving curbside recycling for the first time, including 11 First Nations communities.
- Compliance actions, including sending advisory and warning letters, resulted in over 250 additional producers coming into compliance since program implementation.
- The Ministry continues to pursue compliance with all freeriding producers, including newspapers and is in active discussions with the newspaper industry to find a solution

From: [Polak, Mary HLTH:EX](#)
To: [Zacharias, Mark ENV:EX](#)
Cc: [Shoemaker, Wes AGRI:EX](#); [Kapac de Frias, Martina E ENV:EX](#); [Lewis, Cameron F ENV:EX](#); [Sweeney, Neil PREM:EX](#)
Subject: Re: John Coyne conversation
Date: Sunday, March 27, 2016 8:26:02 AM

Thanks Mark.

We did connect. For some reason, Neil missed the call. Wes was going to follow up with Neil. We didn't get all the way there. We committed to taking some things back and having a further (and hopefully final) conversation on Tuesday.

Sent from my iPad

> On Mar 27, 2016, at 7:59 AM, "Zacharias, Mark ENV:EX" <Mark.Zacharias@gov.bc.ca> wrote:
>
> Good morning Minister
>
> If you had a chance to connect with John yesterday please let us know how it went and whether we are still on track **S.13**
>
> Regards, Mark
> 250-415-6466

From: [Lewis, Cameron F ENV:EX](#)
To: [Kapac de Frias, Martina E ENV:EX](#); [John Coyne - Unilever \(John.Coyne@unilever.com\)](#); ["JCoyne@cssalliance.ca"](#); [Sweeney, Neil PREM:EX](#); [Polak, Mary HLTH:EX](#)
Cc: [Shoemaker, Wes AGRI:EX](#)
Subject: For 2pm (PST) call **S.13**
Date: Wednesday, March 30, 2016 12:27:00 PM
Attachments: **s.13**
Importance: High

Good afternoon,

Sending on behalf of Wes Shoemaker.

Apologies for the short notice, but **s.13** is attached for your review in anticipation of the 2pm (PST) call today.

s.13

Cameron Lewis

Executive Director, Environmental Emergencies and Land Remediation Branch

Ministry of Environment, Province of BC

250-387-9974

Page 25 to/à Page 38

Withheld pursuant to/removed as

s.13

From: [Lewis, Cameron F ENV:EX](#)
To: [Kapac de Frias, Martina E ENV:EX](#); [John Coyne - Unilever \(John.Coyne@unilever.com\)](#); ["JCoyne@cssalliance.ca"](#); [Sweeney, Neil PREM:EX](#); [Polak, Mary HLTH:EX](#)
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s.13

Cameron Lewis
Executive Director, Environmental Emergencies and Land Remediation Branch
Ministry of Environment, Province of BC
250-387-9974

Page 40 to/à Page 53

Withheld pursuant to/removed as

s.13

From: [Lewis, Cameron F ENV:EX](#)
To: ["John Coyne"; Shoemaker, Wes AGRI:EX](#)
Cc: [Gemma Zecchini; Allen Langdon - MMBC](#)
Subject: RE: **s.13**
Date: Wednesday, March 30, 2016 2:54:00 PM

Thank you!

Cameron Lewis
Executive Director, Environmental Emergencies and Land Remediation Branch
Ministry of Environment, Province of BC
250-387-9974

-----Original Message-----

From: John Coyne [<mailto:JCoyne@cssalliance.ca>]
Sent: Wednesday, March 30, 2016 2:48 PM
To: Lewis, Cameron F ENV:EX; Shoemaker, Wes ENV:EX
Cc: Gemma Zecchini; Allen Langdon - MMBC
Subject **s.13**

Cameron and Wes

Please see attached markup, mostly wordsmithing so hopefully no issues. Please indicate if acceptable and forward a **s.13** at your convenience.

If you have questions, please let me know.

Regards,

John

John D. Coyne
Executive Chairman, Canadian Stewardship Services Alliance, Inc.
(647) 925-1146
Cell (416) 200-4776



REGISTERED MAIL

File: 293358

November 27, 2015

Rick O'Connor
President and CEO
Black Press
#310-5460 152nd St.
Surrey BC V3S 5J9

Dear Rick O'Connor:

This letter is to advise that Black Press is subject to obligations under the Recycling Regulation (B.C. Reg. 449/2004) as it pertains to the distribution of packaging and printed paper in British Columbia, specifically newsprint. As you are aware, as of May 2014, the Recycling Regulation (the Regulation) requires that the producers (manufacturers, distributors, or importers) of packaging and printed paper (PPP) be responsible for the management of their products at all lifecycle stages, including post-consumer collection and recycling.

In order to sell or distribute products in the packaging and printed paper product category in British Columbia, producers must have an approved Product Stewardship Plan. Section 2(2) of the Regulation however, provides a producer with the option of appointing an agency with an approved plan to discharge its obligations under the Regulation. Multi-Material BC (MMBC) is a not-for-profit organization that is the only agency with an approved Stewardship Plan for managing these materials in British Columbia.

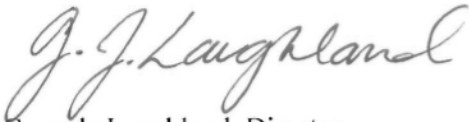
It continues to be the Ministry of Environment's understanding that Black Press sells or distributes products within the packaging and printed paper product category in the Regulation and therefore is a producer of PPP, as defined in Section 2 (Part 1) of the Regulation. Please advise this office immediately how you intend to meet your obligations under Section 2 of the Regulation.

The Ministry is aware that this information is not new to your company and requires a timely response. The Ministry understands that you working on developing various alternatives for newspaper recycling in BC. Please provide an update on any developments regarding this work. Please contact Compliance Officer Louise LeBoutillier by telephone at: 250-356-5413, or by email at:

Louise.LeBoutillier@gov.bc.ca.

.../2

Yours truly,

A handwritten signature in dark ink, reading "G. J. Laughland". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Gwenda Laughland, Director
Compliance Policy and Planning
Ministry of Environment



REGISTERED MAIL

File: 293359

November 27, 2015

Gordon Fisher
President
The Vancouver Sun / The Province
Suite 1, 200 Granville Street
Vancouver BC V6C 3N3

Dear Gordon Fisher:

This letter is to advise that The Vancouver Sun / The Province is subject to obligations under the Recycling Regulation (B.C. Reg. 449/2004) as it pertains to the distribution of packaging and printed paper in British Columbia, specifically newsprint. As you are aware, as of May 2014, the Recycling Regulation (the Regulation) requires that the producers (manufacturers, distributors, or importers) of packaging and printed paper (PPP) be responsible for the management of their products at all lifecycle stages, including post-consumer collection and recycling.

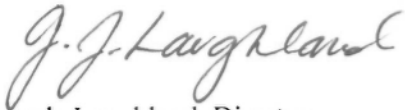
In order to sell or distribute products in the packaging and printed paper product category in British Columbia, producers must have an approved Product Stewardship Plan. Section 2(2) of the Regulation however, provides a producer with the option of appointing an agency with an approved plan to discharge its obligations under the Regulation. Multi-Material BC (MMBC) is a not-for-profit organization that is the only agency with an approved Stewardship Plan for managing these materials in British Columbia.

It continues to be the Ministry of Environment's understanding that The Vancouver Sun / The Province sells or distributes products within the packaging and printed paper product category in the Regulation and therefore is a producer of PPP, as defined in Section 2 (Part 1) of the Regulation. Please advise this office immediately how you intend to meet your obligations under Section 2 of the Regulation.

The Ministry is aware that this information is not new to your company and requires a timely response. The Ministry understands that you working on developing various alternatives for newspaper recycling in BC. Please provide an update on any developments regarding this work. Please contact Compliance Officer Louise LeBoutillier by telephone at: 250-356-5413, or by email at: Louise.LeBoutillier@gov.bc.ca.

.../2

Yours truly,

A handwritten signature in cursive script, reading "G. J. Laughland".

Gwenda Laughland, Director
Compliance Policy and Planning
Ministry of Environment



REGISTERED MAIL

File: 293360

November 27, 2015

Jonathon Kennedy
President and Chief Executive Officer
Glacier Media Inc.
2188 Yukon Street
Vancouver BC V5Y 3P1

Dear Jonathon Kennedy:

This letter is to advise that Glacier Media Inc. is subject to obligations under the Recycling Regulation (B.C. Reg. 449/2004) as it pertains to the distribution of packaging and printed paper in British Columbia, specifically newsprint. As you are aware, as of May 2014, the Recycling Regulation (the Regulation) requires that the producers (manufacturers, distributors, or importers) of packaging and printed paper (PPP) be responsible for the management of their products at all lifecycle stages, including post-consumer collection and recycling.


In order to sell or distribute products in the packaging and printed paper product category in British Columbia, producers must have an approved Product Stewardship Plan. Section 2(2) of the Regulation however, provides a producer with the option of appointing an agency with an approved plan to discharge its obligations under the Regulation. Multi-Material BC (MMBC) is a not-for-profit organization that is the only agency with an approved Stewardship Plan for managing these materials in British Columbia.

It continues to be the Ministry of Environment's understanding that Glacier Media Inc. sells or distributes products within the packaging and printed paper product category in the Regulation and therefore is a producer of PPP, as defined in Section 2 (Part 1) of the Regulation. Please advise this office immediately how you intend to meet your obligations under Section 2 of the Regulation.

The Ministry is aware that this information is not new to your company and requires a timely response. The Ministry understands that you working on developing various alternatives for newspaper recycling in BC. Please provide an update on any developments regarding this work. Please contact Compliance Officer Louise LeBoutillier by telephone at: 250-356-5413, or by email at: Louise.LeBoutillier@gov.bc.ca.

.../2

Yours truly,


Gwenda Laughland, Director
Compliance Policy and Planning
Ministry of Environment

From: [Rick O'Connor](#)
To: [LeBoutillier, Louise ENV:EX](#)
Cc: [Polak, Mary HLTH:EX](#); ["Dimitri Pantazopoulos"](#)
Subject: Response to MOE Letter of November 27th
Date: Monday, December 14, 2015 12:20:05 PM
Attachments: [Response to November 27th MOE letter.pdf](#)

Hello Louise: Please find attached our response to your letter dated November 27th, 2015.

Regards,

Rick O'Connor
President and CEO
Black Press
#310-5460 152nd Street
Surrey, B.C.
V3S 5J9

Dear: Louise LeBoutillier
Compliance Officer
Ministry of the Environment

We are in receipt of your letter dated November 27, 2015. We are also aware of the obligations under the Recycling Regulation (B.C. Reg 449/2004).

As you are aware, the newspaper industry has been a leader in the area of environmental stewardship through the past two decades. Through years of consumer education, recycling rates have risen to levels far beyond those mandated under the regulation. Yet, in seeking to solve an issue in other areas of consumer packaging including the use of excessive packaging materials and a lack of uptake in post-consumer recycling, this regulation has undermined the success of newspaper recycling.

Over the past months, we have been working on developing a plan to comply with the regulation in a manner consistent that allows for maximum recapture of newsprint but that does not bring undue hardship on our company or imperil our industry.

We look forward to a formal meeting to present our position early in 2016. We are currently making a request to meet with senior officials and policy makers in the third week of January. We would welcome the opportunity to discuss the work we have undertaken to date and our proposed solution to fulfill our obligation under the Recycling Regulation following that meeting.

Sincerely,



Rick O'Connor
President & CEO
Black Press.

C.C.

Mary Polak, Minister of Environment

From: [Polak, Mary ENV:EX](#)
To: [Rick O'Connor](#)
Cc: [LeBoutillier, Louise ENV:EX](#); [Dimitri Pantazopoulos](#)
Subject: Re: Response to MOE Letter of November 27th
Date: Monday, December 14, 2015 12:23:13 PM

Thank you, Rick.

Sent from my iPad

On Dec 14, 2015, at 12:20 PM, "Rick O'Connor" <ricko@blackpress.ca> wrote:

Hello Louise: Please find attached our response to your letter dated November 27th, 2015.

Regards,

Rick O'Connor
President and CEO
Black Press
#310-5460 152nd Street
Surrey, B.C.
V3S 5J9

<Response to November 27th MOE letter.pdf>

From: Fisher, Gordon (Postmedia)
To: LeBoutillier, Louise ENV:EX
Subject: Ministry Letter re: Recycling Regulation - File 293359
Date: Tuesday, December 15, 2015 4:45:12 AM
Attachments: Response to Nov 27 letter Dec 15 2015.pdf
Importance: High

Good morning.

Please see attached.

Regards,

GORDON FISHER

President, National Post and EVP Reader Revenue and Manufacturing



TEL: 416.847.4711

CELL: 647.828.7534

EMAIL: gfisher@postmedia.com

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365 Bloor St E, 12th Floor
Toronto, Ontario M4W 3L4

Executive Assistant: Fátima Sousa

Tel: (416) 383-2533

E-mail: fsousa@postmedia.com

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Via E-mail

December 15, 2015

Louise LeBoutillier
Compliance Officer
British Columbia
Ministry of Environment
Waste Prevention Section
P.O. Box 9341
Stn Prov Govt
Victoria BC V8W 9M1

Dear Ms. LeBoutillier:

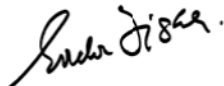
We are in receipt of your letter dated November 27, 2015. We are also aware of the obligations under the Recycling Regulation (B.C. Reg 449/2004).

As you are aware, the newspaper industry has been a leader in the area of environmental stewardship through the years. Through years of consumer education, recycling rates have risen to levels far beyond those mandated under the regulation. Yet, in seeking to solve an issue in other areas of consumer packaging including the use of excessive packaging materials and a lack of uptake in post-consumer recycling, this regulation has undermined the success of newspaper recycling.

Over the past months, we have been working on developing a plan to comply with the regulation in a manner consistent that allows for maximum recapture of newsprint but that does not bring undue hardship on our company or imperil our industry.

We would look forward to a formal meeting to present our position early in the new year. We are currently making a request to meet with senior officials and policy makers in the third week of January. We would welcome the opportunity to discuss the work we have undertaken to date and our proposed solution to fulfill our obligation under the Recycling Regulation following that meeting.

Sincerely,



Gordon Fisher

GF:fs

From: [Theresa Mejias](#)
To: [LeBoutillier, Louise ENV:EX](#)
Cc: [Polak, Mary HLTH:EX](#); [Dmitri Pantazopolulos](#)
Subject: Response letter from Glacier Media Inc. - File 293360
Date: Tuesday, December 15, 2015 5:09:56 PM
Attachments: [Response Letter from Glacier Media Inc. - File 293360.pdf](#)
Importance: High

Dear Louise LeBoutillier,

Re: File 293360

On behalf of Jonathon Kennedy, President and CEO of Glacier Media Inc., I'm submitting the attached response, as per your recent letter to Glacier Media Inc.

If you have any questions, please contact Jonathon Kennedy at 604-708-3276 or jkennedy@glaciermedia.ca

Thank you,

Theresa Mejias Davis

Administrative Assistant

Glacier Media Inc.

2188 Yukon Street | Vancouver, B.C | V5Y 3P1

Office 604.638.2459 | Fax 604.638.2453

tmejias@glaciermedia.ca



2188 Yukon Street, Vancouver, B.C. V5Y 3P1 Tel: 604.872.8565 Fax: 604.638.2453

December 15th, 2015

Louise LeBoutillier
Compliance Officer
Ministry of Environment
Waste Prevention Section
Environmental Protection Division

Re: File 293360

Dear Louise LeBoutillier,

We are in receipt of your letter dated November 27, 2015. We are also aware of the obligations under the Recycling Regulation (B.C. Reg 449/2004).

As you are aware, the newspaper industry has been a leader in the area of environmental stewardship through the years. Through years of consumer education, recycling rates have risen to levels far beyond those mandated under the regulation. Yet, in seeking to solve an issue in other areas of consumer packaging including the use of excessive packaging materials and a lack of uptake in post-consumer recycling, this regulation has undermined the success of newspaper recycling.

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We would look forward to a formal meeting to present our position early in the New Year. We are currently making a request to meet with senior officials and policy makers in the third week of January. We would welcome the opportunity to discuss the work we have undertaken to date and our proposed solution to fulfill our obligation under the Recycling Regulation following that meeting.

Sincerely,

A handwritten signature in black ink, appearing to read "Jonathon Kennedy", is written over a horizontal line.

Jonathon Kennedy
President & CEO

cc: The Honourable Mary Polak, Minister of Environment
Dimitri Pantazopoulos