

**From:** [Lewis, Cameron F ENV:EX](#)  
**To:** ["joshua@mapleleafstrategies.com"](mailto:joshua@mapleleafstrategies.com)  
**Cc:** [Desaulnier, Vicki ENV:EX](#)  
**Subject:** RE: Meeting Request w/ Dimitri Pantazopoulos  
**Date:** Tuesday, May 12, 2015 10:52:00

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Joshua,

Thanks for your e-mail. I'd look forward to the opportunity to meet.

By cc, I will ask Vicki to work with you on a time that works with both calendars.

Can I ask if there are specific issues that Mr. Pantazopoulos would like to touch on? I have only been in my role for about a month, and I'd like to make sure that I'm aware of the items he may have the most interest in.

Thanks.

Cameron Lewis

Executive Director, Waste Prevention

Environmental Protection Division, Ministry of Environment

250-953-3866

---

**From:** joshua@mapleleafstrategies.com [mailto:joshua@mapleleafstrategies.com]  
**Sent:** Tuesday, May 12, 2015 10:07 AM  
**To:** Lewis, Cameron F ENV:EX  
**Subject:** Meeting Request w/ Dimitri Pantazopoulos

Dear Mr. Lewis,

My name is Joshua and I work at Maple Leaf Strategies. We are a government relations firm based in Vancouver. I am emailing you on behalf of my boss Dimitri Pantazopoulos whose clients include Progressive Waste Solutions and Newspapers Canada. Dimitri would like to sit down and have coffee with you at some point in the coming weeks. He is in Victoria fairly often so we can establish a time and place that is appropriate for both your schedules. For Dimitri, these are the days he will be in Victoria:

In May: Monday 18th, Tuesday 19th, Friday 29th

In June: Monday 1st, Friday 12th, Monday 15th, Tuesday 16th

Please let me know if these days work for you. Thank you for your time. I hope to hear from you soon.

Best,

[Joshua Ng](#)

Maple Leaf Strategies

Government Relations | Public Affairs | Research

T: (778) 588-6222 (ext. 303)

M: (778) 888-2391

E: [joshua@mapleleafstrategies.com](mailto:joshua@mapleleafstrategies.com)

[www.mapleleafstrategies.com](http://www.mapleleafstrategies.com)

**From:** [Lewis, Cameron F ENV:EX](#)  
**To:** [Halls, Lori D PSA:EX](#)  
**Subject:** FW: Meeting Request w/ Dimitri Pantazopoulos  
**Date:** Tuesday, May 12, 2015 10:53:00

---

Just FYI.

I will let you know when a meeting date I set, and I've also asked if there are specific issues they'd like to raise with me.

Cameron Lewis

Executive Director, Waste Prevention

Environmental Protection Division, Ministry of Environment

250-953-3866

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**Sent:** Tuesday, May 12, 2015 10:07 AM

**To:** Lewis, Cameron F ENV:EX

**Subject:** Meeting Request w/ Dimitri Pantazopoulos

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In May: Monday 18th, Tuesday 19th, Friday 29th

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Please let me know if these days work for you. Thank you for your time. I hope to hear from you soon.

Best,

[Joshua Ng](#)

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From: [Lewis, Cameron F ENV:EX](#)  
To: [Halls, Lori D PSA:EX](#)  
Cc: [Lewis, Cameron F ENV:EX](#)  
Subject: a few quick items in advance of our 11:30 MMBC call  
Date: Friday, June 5, 2015 09:50:08

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1. Dimitri Patazopoulos told me that the newspapers are looking at a return to depot solution that would not involve partnering with MMBC. No details, other than it seemed like they'd actually put some work into the proposed model (financials, some consumer research, etc.) No sense of timing. Also, I think from a Ministry perspective, since households will continue to put their newspapers in their blue boxes, any reasonable solution has to involve MMBC in some fashion.
2. MMBC has informed us that they have reached a verbal agreement with the Brewers. That's good news.
3. A question: Has there been any window of opportunity for you or the Minister to communicate to the PO that there may be opportunities to leverage some additional commitments from MMBC and bring some of the waitlisted communities on, if government can bring newspapers on board in some fashion? (even if they are perhaps phased in over time, etc?)

Cameron Lewis  
Executive Director, Waste Prevention  
Environmental Protection Division, Ministry of Environment  
250-953-3866

From: [Scott, Heidi ENV:EX](#)  
To: [Rollheiser, Kate ENV:EX](#)  
Subject: FW: Meeting Request from BC newspaper group for Minister Polak  
Date: Friday, June 19, 2015 13:54:08

---

For cliffing ☺

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From: [carling@mapleleafstrategies.com](mailto:carling@mapleleafstrategies.com) [<mailto:carling@mapleleafstrategies.com>]  
Sent: Thursday, June 18, 2015 2:47 PM  
To: Scott, Heidi ENV:EX  
Subject: Meeting Request from BC newspaper group for Minister Polak

Heidi -

Our client, the group of BC newspapers (Post Media, Glacier Media and Black Press), are in a place where they would like to discuss with the Minister the progress they have made with regards to the PPP regulation.

Would Minister Polak have 30 minutes to meet with them in the coming weeks? They have specifically requested Tuesday July 14th. Could you please let me know if this works for Minister Polak?

Many thanks in advance for consideration of this request.

Regards,

Carling

[Carling Dick](#) | Senior Consultant  
Maple Leaf Strategies  
Government Relations | Public Affairs | Research  
999 Canada Place, Suite 520  
Vancouver, BC V6C 3E2  
T: (778) 588-6222 (ext. 301)  
M: (778) 874-1864  
E: [carling@mapleleafstrategies.com](mailto:carling@mapleleafstrategies.com)  
Twitter: @carlingdick  
[www.mapleleafstrategies.com](http://www.mapleleafstrategies.com)



From: [Lewis, Cameron F ENV:EX](#)  
To: ["Dimitri Pantazopoulos"](#)  
Subject: RE: Time for coffee....  
Date: Wednesday, September 2, 2015 16:29:00

---

Dimitri,

Great to hear from you.

s.22

Not sure

when you're coming into town?

Cameron Lewis

Executive Director, Waste Prevention

Environmental Protection Division, Ministry of Environment

250-953-3866

---

**From:** Dimitri Pantazopoulos [mailto:[dimitri@mapleleafstrategies.com](mailto:dimitri@mapleleafstrategies.com)]

**Sent:** Wednesday, September 2, 2015 4:14 PM

**To:** Lewis, Cameron F ENV:EX

**Cc:** Carling Dick

**Subject:** Time for coffee....

Hi Cameron,

I am going to be in Victoria this weekend. Realizing that it is the start of a long weekend and you may be angling to get work done so you can take the extra day with a clear conscience, I was wondering if you have time for a coffee on Friday to catch up?

Let me know. I am pretty flexible.

dp

[Dimitri Pantazopoulos | Partner](#)

Maple Leaf Strategies

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From: [Lewis, Cameron F ENV:EX](#)  
To: [Zacharias, Mark ENV:EX](#)  
Subject: Invitation from Dimitri Pantazopoulos  
Date: Wednesday, September 2, 2015 16:36:00  
Importance: High

---

Mark,

I met with Dimitri once before several months ago.

However, I think Lori wanted to inform the MO about it at that time. He has newspapers as one of his clients (re PPP, MMBC free-riding, etc.) and was previously with PO I believe.

Short notice, but am I ok to accept an invitation to meet with him tomorrow?

Cameron Lewis

Executive Director, Waste Prevention

Environmental Protection Division, Ministry of Environment

250-953-3866

---

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

**Sent:** Wednesday, September 2, 2015 4:32 PM

**To:** Lewis, Cameron F ENV:EX

**Cc:** Carling Dick

**Subject:** Re: Time for coffee....

How about lunch. Noon? Place?

I am taking the ferry, so if that changes, I will email you.

DP

-----  
Dimitri Pantazopoulos

[dimitrip@me.com](mailto:dimitrip@me.com)

(250) 588-1345

On Sep 2, 2015, at 4:29 PM, Lewis, Cameron F ENV:EX <[Cameron.Lewis@gov.bc.ca](mailto:Cameron.Lewis@gov.bc.ca)> wrote:

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From: [Lewis, Cameron F ENV:EX](#)  
To: [Zacharias, Mark ENV:EX](#)  
Subject: RE: Invitation from Dimitri Pantazopoulos  
Date: Wednesday, September 2, 2015 16:50:00

---

Thanks!

Cameron Lewis

Executive Director, Waste Prevention

Environmental Protection Division, Ministry of Environment

250-953-3866

---

From: Zacharias, Mark ENV:EX  
Sent: Wednesday, September 2, 2015 4:50 PM  
To: Lewis, Cameron F ENV:EX  
Subject: Re: Invitation from Dimitri Pantazopoulos  
Let me quickly check.

Regards, Mark  
250-415-6466

On Sep 2, 2015, at 4:36 PM, Lewis, Cameron F ENV:EX <[Cameron.Lewis@gov.bc.ca](mailto:Cameron.Lewis@gov.bc.ca)> wrote:

Mark,

I met with Dimitri once before several months ago.

However, I think Lori wanted to inform the MO about it at that time. He has newspapers as one of his clients (re PPP, MMBC free-riding, etc.) and was previously with PO I believe.

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From: [Lewis, Cameron F ENV:EX](#)  
To: [Zacharias, Mark ENV:EX](#)  
Subject: Re: Invitation from Dimitri Pantazopoulos  
Date: Wednesday, September 2, 2015 18:37:09

---

Thanks Mark.

Sent from my iPhone

On Sep 2, 2015, at 6:29 PM, Zacharias, Mark ENV:EX <[Mark.Zacharias@gov.bc.ca](mailto:Mark.Zacharias@gov.bc.ca)> wrote:

Thx Cameron for the heads up. Martina spoke with Dimitri and he is going to reschedule through the MO.

Regards, Mark  
250-415-6466

On Sep 2, 2015, at 4:36 PM, Lewis, Cameron F ENV:EX  
<[Cameron.Lewis@gov.bc.ca](mailto:Cameron.Lewis@gov.bc.ca)> wrote:

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**Cc:** Carling Dick  
**Subject:** Re: Time for coffee....  
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From: [Lewis, Cameron F ENV:EX](#)  
To: [Dimitri Pantazopoulos](#)  
Subject: Re: Time for coffee....  
Date: Wednesday, September 2, 2015 22:00:53

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Hi Dimitri,

Sounds like we'll have to take a rain check. I understand you'll be connecting with the Minister's office. Thanks for dropping me a line though.

Have a good long weekend.

Sent from my iPhone

On Sep 2, 2015, at 4:31 PM, Dimitri Pantazopoulos <[dimitri@mapleleafstrategies.com](mailto:dimitri@mapleleafstrategies.com)> wrote:

How about lunch. Noon? Place?  
I am taking the ferry, so if that changes, I will email you.

DP

-----  
Dimitri Pantazopoulos

[dimitrip@me.com](mailto:dimitrip@me.com)  
(250) 588-1345

On Sep 2, 2015, at 4:29 PM, Lewis, Cameron F ENV:EX  
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Dimitri,  
Great to hear from you.

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Not sure when you're coming into town?

Cameron Lewis  
Executive Director, Waste Prevention  
Environmental Protection Division, Ministry of Environment  
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**Cc:** Carling Dick

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[www.mapleleafstrategies.com](http://www.mapleleafstrategies.com)

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

---

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

Regards,

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

Dear: Louise LeBoutillier  
Compliance Officer  
Ministry of the Environment

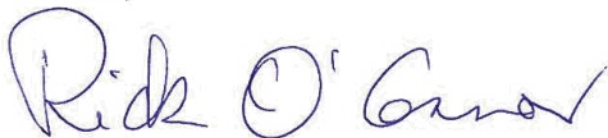
We are in receipt of your letter dated November 27, 2015. We are also aware of the obligations under the Recycling Regulation (B.C. Reg 449/2004).

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

---

Thank you, Rick.

Sent from my iPad

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

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

Regards,

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

<Response to November 27th MOE letter.pdf>



**From:** [Scott, Heidi ENV:EX](#)  
**To:** [Rollheiser, Kate ENV:EX](#)  
**Subject:** FW: Meeting Request from BC newspaper group for Minister Polak  
**Date:** Monday, December 14, 2015 14:42:39

---

Please cliff and bluey

---

**From:** Carling Dick [mailto:carling@mapleleafstrategies.com]  
**Sent:** Monday, December 14, 2015 2:32 PM  
**To:** Kapac de Frias, Martina E ENV:EX  
**Cc:** Scott, Heidi ENV:EX  
**Subject:** Meeting Request from BC newspaper group for Minister Polak

Martina -

Our client, the group of BC newspapers (Post Media, Glacier Media and Black Press), is requesting a meeting with Minister Polak in January to discuss the work they have undertaken to date and their proposed solution to fulfill their obligation under the Recycling Regulation.

Does Minister Polak have availability in January? Our client has specifically requested the third week of January (the week of January 18th). Could you please let me know if this works for Minister Polak?

Many thanks in advance for consideration of this request.

Regards,

Carling

[Carling Dick](#) | Senior Consultant  
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Twitter: @carlingdick  
[www.mapleleafstrategies.com](http://www.mapleleafstrategies.com)

From: Theresa Mejias  
To: [LeBoutillier, Louise ENV:EX](#)  
Cc: [Polak, Mary ENV:EX](#); [Dmitri Pantazopolulos](#)  
Subject: Response letter from Glacier Media Inc. - File 293360  
Date: Tuesday, December 15, 2015 17:09:56  
Attachments: [Response Letter from Glacier Media Inc. - File 293360.pdf](#)  
Importance: High

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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](mailto: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](mailto:tmejias@glaciermedia.ca)



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

December 15<sup>th</sup>, 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.

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,

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

**From:** [Lewis, Cameron F ENV:EX](#)  
**To:** [Zacharias, Mark ENV:EX](#)  
**Subject:** FW: Meeting Request from BC newspaper group for Minister Polak  
**Date:** Monday, January 4, 2016 14:44:00

---

Mark,

I have an e-approvals task to prepare an Info Note for MMP in advance of this meeting later this month.

Normally, I'd contact the stakeholder and ask for any info or materials that could aid the

Branch in preparing the Minister for the meeting, but this summer, following a meeting with

Dimitri Pantazopoulos, I was told that contact with Maple Leaf on the newspapers issue

should be directed through the MO/PO.

Perhaps if you are touching base on the SC Plan, or the newspapers issue, you could ask if

MO would like us to reach out to Maple Leaf or not?

Barring any contact with Maple Leaf in advance of the meeting, our info note will pretty

much contain background info on the newspapers issue that MMP has seen before.

Cameron Lewis

Executive Director, Waste Prevention

Environmental Protection Division, Ministry of Environment

250-953-3866

---

**From:** Scott, Heidi ENV:EX  
**Sent:** Monday, December 14, 2015 2:43 PM  
**To:** Rollheiser, Kate ENV:EX  
**Subject:** FW: Meeting Request from BC newspaper group for Minister Polak  
[Please cliff and bluey](#)

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[Carling Dick](#) | Senior Consultant

Maple Leaf Strategies

Government Relations | Public Affairs | Research

999 Canada Place, Suite 520

Vancouver, BC V6C 3E2

T: (778) 588-6222 (ext. 301)

M: (778) 874-1864

E: [carling@mapleleafstrategies.com](mailto:carling@mapleleafstrategies.com)

Twitter: @carlingdick

[www.mapleleafstrategies.com](http://www.mapleleafstrategies.com)

From: [Lewis, Cameron F ENV:EX](#)  
To: ["carling@mapleleafstrategies.com"](mailto:carling@mapleleafstrategies.com); ["Dimitri Pantazopoulos"](#)  
Subject: BC Newspapers mtg with Minister Polak  
Date: Wednesday, January 6, 2016 10:04:00

---

Hello Dimitri. Hello Carling. Happy new year.

Dimitri, you may recall we had the chance to meet last summer.

I understand that your BC Newspaper clients have a meeting with Minister Polak on Jan 21. As the Executive Director responsible for BC's extended producer responsibility programs I've been asked to have my branch prepare a briefing note for the Minister's Office in advance of this meeting.

Although it is normally most appropriate for you to work directly through the Minister's Office on these matters, I have been asked by my ADM to contact you directly in this case to inquire if there is any information you can make available in. Any information you may be able to share in advance regarding BC newspapers' plans for recycling would be very useful.

s.22

Thanks!

Cameron Lewis

Executive Director, Waste Prevention

Environmental Protection Division, Ministry of Environment



**From:** Dimitri Pantazopoulos  
**To:** [Lewis, Cameron F ENV:EX](#); [Carling Dick](#)  
**Subject:** Re: BC Newspapers mtg with Minister Polak  
**Date:** Wednesday, January 6, 2016 11:27:15

---

Hi Cameron,

Why don't we arrange to chat either tomorrow or Friday. I have some availability on Friday afternoon. Tomorrow would be best around 11, I believe.

Carling can work out the times.

dp

---

**From:** "Lewis, Cameron F ENV:EX" <[Cameron.Lewis@gov.bc.ca](mailto:Cameron.Lewis@gov.bc.ca)>

**Date:** Wednesday, January 6, 2016 at 10:04 AM

**To:** Carling Dick <[carling@mapleleafstrategies.com](mailto:carling@mapleleafstrategies.com)>, Dimitri Pantazopoulos  
<[dimitri@mapleleafstrategies.com](mailto:dimitri@mapleleafstrategies.com)>

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Executive Director, Waste Prevention

Environmental Protection Division, Ministry of Environment

From: [Lewis, Cameron F ENV:EX](#)  
To: ["Dimitri Pantazopoulos"; "Carling Dick"](#)  
Subject: RE: BC Newspapers mtg with Minister Polak  
Date: Wednesday, January 6, 2016 13:58:00

---

Thanks Dimitri.

If we'd be able to do tomorrow, that'd be great.

I can be available whenever you can.

Carling, I'll block off some time at 11, but just let me know what specific time works, and who should call whom.

Thanks!

Cameron Lewis

Executive Director, Waste Prevention

Environmental Protection Division, Ministry of Environment

250-953-3866

---

**From:** Dimitri Pantazopoulos [mailto:[dimitri@mapleleafstrategies.com](mailto:dimitri@mapleleafstrategies.com)]

**Sent:** Wednesday, January 6, 2016 11:27 AM

**To:** Lewis, Cameron F ENV:EX; Carling Dick

**Subject:** Re: BC Newspapers mtg with Minister Polak

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Executive Director, Waste Prevention  
Environmental Protection Division, Ministry of Environment

From: Carling Dick  
To: [Lewis, Cameron F ENV:EX](#)  
Cc: [Dimitri Pantazopoulos](#)  
Subject: Re: BC Newspapers mtg with Minister Polak  
Date: Thursday, January 7, 2016 00:13:53

---

Cameron -

Can we say 11:30 AM tomorrow (Thursday)? Should Dimitri call you at your desk?

Carling

[Carling Dick](#) | Senior Consultant  
Maple Leaf Strategies  
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999 Canada Place, Suite 520  
Vancouver, BC V6C 3E2  
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[www.mapleleafstrategies.com](http://www.mapleleafstrategies.com)

---

**From:** Lewis, Cameron F ENV:EX  
**Sent:** Wednesday, January 6, 2016 1:58 PM  
**To:** Dimitri Pantazopoulos; Carling Dick  
**Subject:** RE: BC Newspapers mtg with Minister Polak

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Executive Director, Waste Prevention

Environmental Protection Division, Ministry of Environment

250-953-3866

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**Sent:** Wednesday, January 6, 2016 11:27 AM  
**To:** Lewis, Cameron F ENV:EX; Carling Dick  
**Subject:** Re: BC Newspapers mtg with Minister Polak

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Cameron Lewis

Executive Director, Waste Prevention

Environmental Protection Division, Ministry of Environment

From: [Lewis, Cameron F ENV:EX](#)  
To: ["Carling Dick"](#)  
Cc: ["Dimitri Pantazopoulos"](#)  
Subject: RE: BC Newspapers mtg with Minister Polak  
Date: Thursday, January 7, 2016 07:59:00

---

Sounds good. Thank you! Desk number below.

Cameron Lewis

Executive Director, Waste Prevention

Environmental Protection Division, Ministry of Environment

250-953-3866

---

From: Carling Dick [mailto:carling@mapleleafstrategies.com]  
Sent: Thursday, January 7, 2016 12:14 AM  
To: Lewis, Cameron F ENV:EX  
Cc: Dimitri Pantazopoulos  
Subject: Re: BC Newspapers mtg with Minister Polak  
Cameron -

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Thanks!

Cameron Lewis

Executive Director, Waste Prevention

Environmental Protection Division, Ministry of Environment

From: [Lewis, Cameron F ENV:EX](#)  
To: [Harris, Lucas ENV:EX](#)  
Cc: [McDonald, Bob ENV:EX](#); [Lewis, Cameron F ENV:EX](#)  
Subject: Newspapers update - for info note  
Date: Thursday, January 7, 2016 11:46:38

---

Hi Lucas,

I'll debrief you and Bob on my conversation with Maple Leaf, but for the Info note, I'm thinking text along the lines of:

High level information provided to ENV by industry representatives in advance of the January 21, 2016 meeting indicates that the BC newspaper sector continues to feel that full fee membership in MMBC is not appropriate, and has now determined that a stand-alone newspaper collection and recycling scheme is unlikely to be practical. In the upcoming meeting, BC newspaper sector representatives are likely to discuss a range of ways that their sector can contribute to the overall objectives of extended producer responsibility (e.g. in-kind advertising) but will also likely communicate that substantial cash contributions are unlikely to be acceptable to the industry.

Cameron Lewis

Executive Director, Waste Prevention

Environmental Protection Division, Ministry of Environment

250-953-3866

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 11:26:42  
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

5<sup>th</sup> Floor, 2975 Jutland Road

Victoria, BC

Tel: 250.387.5429 | Fax: 250.387.6003

E-mail: [wes.shoemaker@gov.bc.ca](mailto:wes.shoemaker@gov.bc.ca)

**\*\*Please note: This email is intended for the addressee(s) only and may contain legally privileged information. Any unauthorized use, disclosure or reproduction is strictly prohibited.\*\***

Page 33 to/à Page 39

Withheld pursuant to/removed as

s.13;s.17

Page 40 to/à Page 44

Withheld pursuant to/removed as

s.17

From: [Shoemaker, Wes ENV:EX](#)  
To: ["Dimitri Pantazopoulos"; Foster, Doug FIN:EX](#)  
Cc: [Cao, Shihang ENV:EX](#)  
Subject: **s.13,s.17** and Newspaper Plan  
Date: Friday, December 23, 2016 11:42:25  
Attachments: **s.13**

---

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  
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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,s.17** : and Newspaper Plan  
Date: Friday, December 23, 2016 12:00:30

---

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,s.17** and Newspaper Plan

That should work.

Let's go with your office **s.22**  
client.

Merry Christmas.

dp

---

From: "Shoemaker, Wes ENV:EX" <[Wes.Shoemaker@gov.bc.ca](mailto:Wes.Shoemaker@gov.bc.ca)>  
Date: Friday, December 23, 2016 at 11:53 AM  
To: Dimitri Pantazopoulos <[dimitri@mapleleafstrategies.com](mailto:dimitri@mapleleafstrategies.com)>, "Foster, Doug FIN:EX" <[Doug.Foster@gov.bc.ca](mailto:Doug.Foster@gov.bc.ca)>  
Cc: "Cao, Shihang ENV:EX" <[Shihang.Cao@gov.bc.ca](mailto:Shihang.Cao@gov.bc.ca)>  
Subject: **s.22** 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: **s.13,s.17** and Newspaper Plan  
Do we have a time on hold?

---

From: "Shoemaker, Wes ENV:EX" <[Wes.Shoemaker@gov.bc.ca](mailto:Wes.Shoemaker@gov.bc.ca)>  
Date: Friday, December 23, 2016 at 11:50 AM  
To: Dimitri Pantazopoulos <[dimitri@mapleleafstrategies.com](mailto:dimitri@mapleleafstrategies.com)>, "Foster, Doug FIN:EX" <[Doug.Foster@gov.bc.ca](mailto:Doug.Foster@gov.bc.ca)>  
Cc: "Cao, Shihang ENV:EX" <[Shihang.Cao@gov.bc.ca](mailto:Shihang.Cao@gov.bc.ca)>  
Subject: **s.22** 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 6<sup>th</sup> 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,s.17**

**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,s.17** 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](mailto:Wes.Shoemaker@gov.bc.ca)>  
Date: Friday, December 23, 2016 at 11:42 AM  
To: Dimitri Pantazopoulos <[dimitri@mapleleafstrategies.com](mailto:dimitri@mapleleafstrategies.com)>, "Foster, Doug FIN:EX" <[Doug.Foster@gov.bc.ca](mailto:Doug.Foster@gov.bc.ca)>  
Cc: "Cao, Shihang ENV:EX" <[Shihang.Cao@gov.bc.ca](mailto:Shihang.Cao@gov.bc.ca)>  
Subject: **s.13,s.17** : 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.22** and Newspaper Plan  
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.17**

**s.13,s.17**

Attached you will find:

**s.13,s.17**

- 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,s.17**

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.17

s.13,s.17

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

5<sup>th</sup> Floor, 2975 Jutland Road

Victoria, BC

Tel: 250.387.5429 | Fax: 250.387.6003

E-mail: [wes.shoemaker@gov.bc.ca](mailto:wes.shoemaker@gov.bc.ca)

**\*\*Please note: This email is intended for the addressee(s) only and may contain legally privileged information. Any unauthorized use, disclosure or reproduction is strictly prohibited.\*\***

From: [Shoemaker, Wes ENV:EX](#)  
To: ["Dimitri Pantazopoulos"; Foster, Doug FIN:EX](#)  
Cc: [Cao, Shihang ENV:EX](#)  
Subject: **s.13,s.17** and Newspaper Plan  
Date: Friday, January 6, 2017 09:16:42

---

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](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,s.17** 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](mailto:dimitri@mapleleafstrategies.com)  
[www.mapleleafstrategies.com](http://www.mapleleafstrategies.com)

---

From: "Shoemaker, Wes ENV:EX" <[Wes.Shoemaker@gov.bc.ca](mailto:Wes.Shoemaker@gov.bc.ca)>  
Date: Friday, December 23, 2016 at 11:42 AM  
To: Dimitri Pantazopoulos <[dimitri@mapleleafstrategies.com](mailto:dimitri@mapleleafstrategies.com)>, "Foster, Doug FIN:EX" <[Doug.Foster@gov.bc.ca](mailto:Doug.Foster@gov.bc.ca)>  
Cc: "Cao, Shihang ENV:EX" <[Shihang.Cao@gov.bc.ca](mailto:Shihang.Cao@gov.bc.ca)>  
Subject: **s.13,s.17** and Newspaper Plan

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To: 'Dimitri Pantazopoulos'; Foster, Doug FIN:EX  
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Subject: s.13,s.17

and Newspaper Plan

Importance: High

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Happy holidays,

**Wes**

W.H. (Wes) Shoemaker, MBA

Deputy Minister

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**5<sup>th</sup> Floor, 2975 Jutland Road**

**Victoria, BC**

**Tel: 250.387.5429 | Fax: 250.387.6003**

**E-mail: [wes.shoemaker@gov.bc.ca](mailto:wes.shoemaker@gov.bc.ca)**

**\*\*Please note: This email is intended for the addressee(s) only and may contain legally privileged information. Any unauthorized use, disclosure or reproduction is strictly prohibited.\*\***



From: [Lewis, Cameron F ENV:EX](#)  
To: ["joshua@mapleleafstrategies.com"](mailto:joshua@mapleleafstrategies.com)  
Cc: [Desaulnier, Vicki ENV:EX](#)  
Subject: RE: Meeting Request w/ Dimitri Pantazopoulos  
Date: Tuesday, May 12, 2015 10:52:00

---

Joshua,

Thanks for your e-mail. I'd look forward to the opportunity to meet.

By cc, I will ask Vicki to work with you on a time that works with both calendars.

Can I ask if there are specific issues that Mr. Pantazopoulos would like to touch on? I have only been in my role for about a month, and I'd like to make sure that I'm aware of the items he may have the most interest in.

Thanks.

Cameron Lewis

Executive Director, Waste Prevention

Environmental Protection Division, Ministry of Environment

250-953-3866

---

**From:** joshua@mapleleafstrategies.com [mailto:joshua@mapleleafstrategies.com]  
**Sent:** Tuesday, May 12, 2015 10:07 AM  
**To:** Lewis, Cameron F ENV:EX  
**Subject:** Meeting Request w/ Dimitri Pantazopoulos

Dear Mr. Lewis,

My name is Joshua and I work at Maple Leaf Strategies. We are a government relations firm based in Vancouver. I am emailing you on behalf of my boss Dimitri Pantazopoulos whose clients include Progressive Waste Solutions and Newspapers Canada. Dimitri would like to sit down and have coffee with you at some point in the coming weeks. He is in Victoria fairly often so we can establish a time and place that is appropriate for both your schedules. For Dimitri, these are the days he will be in Victoria:

In May: Monday 18th, Tuesday 19th, Friday 29th

In June: Monday 1st, Friday 12th, Monday 15th, Tuesday 16th

Please let me know if these days work for you. Thank you for your time. I hope to hear from you soon.

Best,

[Joshua Ng](#)

Maple Leaf Strategies

Government Relations | Public Affairs | Research

T: (778) 588-6222 (ext. 303)

M: (778) 888-2391

E: [joshua@mapleleafstrategies.com](mailto:joshua@mapleleafstrategies.com)

[www.mapleleafstrategies.com](http://www.mapleleafstrategies.com)

**From:** [Lewis, Cameron F ENV:EX](#)  
**To:** [Halls, Lori D PSA:EX](#)  
**Subject:** FW: Meeting Request w/ Dimitri Pantazopoulos  
**Date:** Tuesday, May 12, 2015 10:53:00

---

Just FYI.

I will let you know when a meeting date I set, and I've also asked if there are specific issues they'd like to raise with me.

Cameron Lewis

Executive Director, Waste Prevention

Environmental Protection Division, Ministry of Environment

250-953-3866

---

**From:** joshua@mapleleafstrategies.com [mailto:joshua@mapleleafstrategies.com]

**Sent:** Tuesday, May 12, 2015 10:07 AM

**To:** Lewis, Cameron F ENV:EX

**Subject:** Meeting Request w/ Dimitri Pantazopoulos

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Please let me know if these days work for you. Thank you for your time. I hope to hear from you soon.

Best,

[Joshua Ng](#)

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## **B.C. OPERATIONS**

### **WASTE & RECYCLING MEASURES**

**Paper & Cardboard** - excess paper waste and expired flyers are compacted on-site and recycled by Cascades Recovery Inc. ([www.recoverycascades.com](http://www.recoverycascades.com)) or other local recycling facilities. Any cardboard waste is handled in the same way.

Paper is baled & sent for pulping. It can then be turned back into recycled newsprint (most common), tissue paper, insulation & egg cartons.

Cardboard is baled & sent for pulping. It can then be turned back into new cardboard boxes, cereal boxes & paper hand towels.

**Plastics** – containers from plate chemistry, plastic shrink-wrap film & strapping are recycled by Cascades Recovery Inc. or other local recycling facilities.

These are baled & sent for melting into pellets (small beads). These pellets are sent to many different manufacturers to form thousands of new products. The clear plastic has the highest reuse value as it does not contain colour and will remain clear when it's melted. Mixed plastic (clear & coloured) will turn gray or black when melted down and has fewer uses such as black plastic plant pots & trays.

**Plates** – several locations are using or switching to chemistry-free plates. Plants that cannot, due to longer runs that the technology does not yet support, use the Metafix neutralizing process ([www.metafix.com](http://www.metafix.com)) which gives the plate chemistry the ability to be neutralized then run down normal city water drains.

Plate slip sheets (paper placed between plates to prevent scratches) are recycled along with other paper waste.

Used plates are recycled by Cascades Recovery Inc. or other local recycling facilities. Plates are melted down and processed back into coils or rolls and can be turned back into new litho plates, cans and auto or aerospace parts.

**Inks** – all plants use vegetable oil based inks that are safe for composting. Old ink is recycled back into black after being picked up by the ink supplier.

**Solvent, Oil / Metal Drums From Oil** – are disposed of by environmental companies such as Tri-Arrow Industrial Recovery and Sumas Environmental Services ([sumas.net](http://sumas.net)) or other local recycling facilities.

**Electronics** – sent to local electronic recycling companies.

**Old parts and other scrap metal** – sent to local metal scrap yards.

**UV & regular florescent light bulbs** – where programs exist, these are sent to local recycling depots that handle such items.

**Empty totes from fountain solution** – are sent via our ink supplier to the US to be recycled or reused or to other local recycling facilities.



**Pallets** – re-useable plastic pallets are used whenever possible. If wooden pallets are used, they are purchased recycled and re-used as much as possible. If they are deemed un-useable, they are returned to the supplier.

# EPR Proposal for Newspapers in BC

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A PROPOSAL TO MOVE FORWARD WITH  
RESPONSIBLE NEWSPAPER STEWARDSHIP  
IN BRITISH COLUMBIA

# Background

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NEWSPAPERS CANADA  
TRUSTED. CONNECTED. TARGETED.

1. B.C. Newspapers have been seeking EPR solution that is environmentally sustainable and viable in context of newspaper industry.
2. Respect main principles of EPR – maintain high levels of recycling, while passing cost to industry.
3. Newspapers have been achieving recycling rates far above levels required by regulation for many years.
4. Newsprint provides significant value to recyclers that drives down cost of recycling - estimated \$9-12.5 million cash is available each year from sale of recycled newsprint.
5. Newspapers are the product, not the package. Newspapers educate and engage the citizenry. Newspapers are treated differently than packaging for EPR in every other jurisdiction in North America.
6. EPR does not cover many forms of products – typically there is more attention where a product is large, or dangerous (e.g. batteries).
7. MMBC earned \$30m on revenues of \$70m in first seven months (represents estimated annualized net income of \$50 million+).
8. Establishing another stewardship plan could undermine the financial stability of the existing program.
9. Newspapers already facing major challenges from competition from Internet (ex. Facebook, Google, etc).
10. British Columbia's EPR program is placing effective taxation authority in the hands of collector with minimal accountability.
11. Subjecting newspapers to the same regulatory regime as packaging in B.C. would cause significant and unfair damage to the industry, which is already facing significant financial challenges.



# Proposed Solution

---

1. **MMBC can continue to collect newsprint** – MMBC can and should continue to collect newsprint and obtain maximum recovery at a maximum cost for material. We estimate there is \$9-12.5 million of realizable cash value from newsprint placed in consumers' hands each year at current volume and rates.
2. **Newspapers will accommodate collection where practical and safe** – Our companies will establish a protocol to accept old newspapers at our facilities throughout the province where it is safe and practical. The emphasis will be on areas that are not served or underserved. This will provide some incremental benefit to the environment without damaging the viability of the system.
3. **Promote Recycling Objectives** - Newspapers will commit to \$4.2 million annually (based on current levels of newsprint production) in advertising to promote 3 R's. This will drive up participation in recycling of ALL materials, not just newspapers.
4. **A Tailored Solution** – Commitment to these actions by newspapers would form the basis of a "tailored EPR approach" for newspapers that is based on the unique circumstance of the industry and would discharge the newspapers of EPR obligations.

Summary Annual Estimated Newsprint & Tonnage  
For British Columbia Newspaper Publications

Newsprint (Gross)	Newsprint (Net Waste) <sup>(4)</sup>	Newsprint through Municipal (Net Waste) <sup>(4)(5)</sup>
(In Metric Tonnes)	(In Metric Tonnes)	(In Metric Tonnes)

Newsprint  
Newspaper Publishers <sup>(1)(2)(3)</sup>

s.21

TOTAL

- (1) Based upon, press & production actual measures retrieved from printing plant facilities.
- (2) Newspaper Publishers comprising of Black Press, Glacier Media, Postmedia, Metro and Globe & Mail.
- (3) Amounts exclude ethnic and independent publications and flyer inserts.
- (4) Waste is recylced commercially by printing plant facilities.
- (5) Excludes single copy, bulk, subscriptions and Translink Distributed recycling prior to reaching municipal blue bins.

Annual BC Estimated Newsprint & Tonnage by Newspaper Publisher	Black Press & External Publications	Globe & Mail	Postmedia & Related Publications	Glacier & External Publications	Newspaper Publishers
	\$21				
Weight (Metric Tons)					
Gross Paper used					
Waste recycled by Print Sites					
Net Paper Used					
Single copy dealer					
Bulk drop commercial					
Metro & 24 Hours Translink Distribution					
Office & Mailed					
Paper through Municipal system (Metric Tons)					

**MINISTRY OF ENVIRONMENT  
MEETING INFORMATION NOTE**

Date: January 12, 2016  
Date of previous note: April 10, 2015  
File: 280-20 / 50400-25/PACK-GEN  
CLIFF/tracking #: 293768

**PREPARED FOR: Honourable Mary Polak, Minister of Environment**

**DATE AND TIME OF MEETING:** January 21, 2016 at 2:00pm

**ATTENDEES:** Jon Kennedy, President & CEO, Glacier Media; Rick O'Connor, President & CEO, Black Press; Representative from Postmedia TBC (Gordon Fisher is not able to attend); Dimitri Pantazopoulos, Partner, Maple Leaf Strategies.

**ISSUE(S):** Discussion regarding the work newspaper publishers have undertaken to date and their proposed solution to fulfil their obligation under the Recycling Regulation.

**BACKGROUND:**

Major newspapers in British Columbia (BC) are currently out of compliance with extended producer responsibility (EPR) provisions within the Recycling Regulation (the Regulation). Newspapers do not contribute to the costs of having their products recycled, and are effectively “free riders”, undermining broader efforts to extend residential packaging and printed paper (PPP) recycling services across BC.

Based on Canadian Newspaper Association (CNA) data for domestic newspapers, it is estimated that the newspaper sector annually distributes 43,131 tonnes of newspapers to the BC residential marketplace (Attachment 1). As MMBC fees are calculated based on tonnage for respective material types (newsprint fee: 20.00 ¢/kg), the estimated financial liability for collecting and managing 75% of the 43,131 tonnes totals \$8.6M/annually. Of the \$8.6M, it is estimated that 76% of the cost (~\$6.5M) would be borne by the top five companies that together contribute 33,024 tonnes to the BC residential waste stream.

Major newspapers in BC have been out of compliance since the Regulation came into effect on May 19, 2014. In June 2014, the three largest publishers requested that they be granted a one-year implementation extension without penalty. The Ministry did not respond, effectively establishing a de facto extension. However, on November 27, 2015, the Ministry of Environment (the Ministry) provided advisory letters to these three largest publishers reminding them of their regulatory obligations, thus ending any de facto extension. Each has replied that they have been working on compliance solutions and requested a meeting with Minister Polak to discuss them.

**DISCUSSION:**

**Impact of Non-compliance**

Financial and Associated Service Impact: The newspaper sector has been identified as the single largest free-rider to the PPP program. The newspaper industry's non-compliance



with the Regulation, and its refusal to contribute to the costs of recycling newspapers accounts for a substantial portion of Multi-Material BC's (MMBC) funding shortfall, and is a key barrier to province-wide MMBC service coverage. Collection of fees from newspapers (~\$8.6M/yr) by MMBC would be sufficient to significantly expand MMBC's producer-funded recycling service to additional BC communities (e.g. Kamloops, Abbotsford, Mission, Thomson-Nicola Regional District, Town of Comox, Chilliwack, Spallumcheen and Ahousaht and Heiltsuk First Nations). The current funding 'gap' challenging MMBC's ability to service all communities is estimated at \$23M.

Impact on Regulatory Integrity: As the Ministry is dedicating substantial resources towards pursuing all other 'freeriding' PPP producers, there has been criticism regarding a perceived double-standard since newspapers have not been subject to enforcement.

### **Newspapers Approach to Compliance**

Negotiations between MMBC and the newspaper industry, and between government and the newspaper industry, have taken into account a wide range of potential payment/contribution options, but have ultimately proven unsuccessful. The Ministry has deferred compliance and enforcement activities against newspapers, pending the outcome of these negotiations.

High level information provided to the Ministry by industry representatives in advance of the January 21, 2016 meeting indicates that the BC newspaper sector continues to feel that full fee membership in MMBC is not appropriate, and has now determined that a stand-alone newspaper collection and recycling scheme is unlikely to be practical. In the upcoming meeting, BC newspaper sector representatives are likely to discuss a range of ways that their sector can contribute to the overall objectives of EPR (e.g. in-kind advertising) but will also likely communicate that substantial cash contributions are unlikely to be acceptable to the industry.

### **Compliance and Enforcement Options**

The Ministry has prepared a Cabinet Submission for consideration on the topic of newspaper publisher non-compliance. In terms of compliance and enforcement tools, the Ministry may utilize Administrative Monetary Penalties (AMPs) or can recommend prosecution to the Crown. However, the effectiveness of both enforcement avenues is questionable due to the limitations on the quantum of the penalties that can be imposed. Penalties through the courts for recycling-related offenses are limited to a maximum of \$200K, and AMPs are normally not issued in amounts exceeding prosecution maximums. As noted above, BC newspaper publishers are currently avoiding MMBC fees of approximately \$8.6M per year.

### **Attachments:**

#### **1. Newspaper Distribution**

#### **Contact:**

*Mark Zacharias  
ADM  
Environmental Protection Division  
250 356-0121*

#### **Alternate Contact:**

*Cameron Lewis  
Executive Director  
Waste Prevention  
250 953-3866*

#### **Prepared by:**

*Lucas Harris  
Senior Policy Analyst  
Waste Prevention  
250 387-9774*

<b>Reviewed by</b>	<b>Initials</b>	<b>Date</b>
DM	WSB for WS	Jan 20/16
DMO	BC	Jan 15/16
ADM	MZ	Jan 15, 2016
Dir./Mgr.		
Author	LH	Jan 6, 2016



# Newspaper Distribution

## Production of Newspapers in BC (Tonnes) and Estimated MMBC Fees (by Owner)

	Ownership	Tonnes	MMBC Fee (\$200/tonne)
1	Postmedia Network Inc.	12,940	\$ 2,588,037
2	Glacier Media Group	9,434	\$ 1,886,841
3	Black Press Group Ltd.	8,691	\$ 1,738,113
4	Metro Intl. SA & Torstar	5,555	\$ 1,110,992
5	Quebecor/Sun Media	4,672	\$ 934,384
6	Continental Newspapers	923	\$ 184,594
7	Thompson Rivers Publications Ltd.	424	\$ 84,792
8	Independent	365	\$ 73,008
9	Continental Newspapers Canada Ltd.	96	\$ 19,217
10	Globemedia Inc.	31	\$ 6,252
	<b>Total</b>	<b>43,131</b>	<b>\$ 8,626,230</b>

Note: Through the Small Producer Definition, the Recycling Regulation exempts producers who either produce less than 1T of PPP or earn less than \$1M gross revenue annually. As a result, approximately 20+ titles would be exempt from the Regulation, such as university newspapers and small ethnic newspapers.

Date Jan 9.

John Kennedy -  
Israel - lawyer  
Peter Kewarshin - Glaxo  
Gordon Fisher - National Post / Pacific

---

Two elements - Israel:

- \* 1) What is the status of contractual agreement w/out regulatory approval? If approval not given
  - 2) Contingency - back page of PPP guidance. should be part of stewardship plan being approved.
    - already considered -
    - so no hiatus or risk
- Agreement is facilitating a business system to get from pt. A - B.

\* End of 5 yrs ?