

Summary of recommendations

Éco Entreprises Québec salutes the government's decision to place companies at the heart of the curbside recycling system and enable them to take responsibility for their containers, packaging, printed matter and newsprint (C, P, PM & N) from design to recycling, with a view to develop a circular economy.

Appointing a single responsible management organization (RMO) for the curbside recycling of C, P, PM & N will ensure fairness amongst companies and the application of a global systemic approach.

However, the Bill lacks clarity as it does not include the principles of EPR, leaving the door open to decisions that may stray from those principles. ÉEQ and its governance structure presents 12 key recommendations.

Twelve (12) recommendations to ensure that modernization is a success



Recommendation 1

In the absence of clarity of Bill 65, ÉEQ recommends that the upcoming regulation should respect EPR principles set forth by the government, confer ownership of materials to companies, avoid being prescriptive regarding means and ensure the flexibility, agility, simplicity, financial predictability and fairness of the curbside recycling system.



Recommendation 2

In an EPR context, ÉEQ recommends that the role of municipalities and the responsibilities of companies be clearly defined in the upcoming regulation by specifying that companies, via their recognized management organization, will ensure the oversight of collection and transportation activities through agreements with municipalities.



Recommendation 3

ÉEQ recommends that a management organization be designated as soon as possible to deal with municipalities during the preparatory and transition period.



Recommendation 4

Bill 65 must be amended so as to require that companies be represented by a single designated recognized management organization.



Recommendation 5

ÉÉQ recommends that, in order to avoid double accounting reporting, only the designated management organization should have the responsibility of submitting requested information to the government or its public corporation.



Recommendation 6

ÉÉQ recommends that Bill 65 be amended to remove article 53.31.0.1 regarding the compensation payable to RECYC-QUÉBEC.



Recommendation 7

ÉÉQ recommends that the grievance settlement mechanism provided for in the Bill must be framed under the upcoming regulation to ensure that decisions will remain within the limits permitted under the law and regulation and will not depart from the principles of an EPR.



Recommendation 8

ÉÉQ recommends that Bill 65 be amended to add a transition measure that will ensure accelerated approval of the Schedule of Contributions provided for in the compensation plan.



Recommendation 9

ÉÉQ recommends that the service via agreements with municipalities should only include small ICIs, such as hairdressing salons, small accountants' offices and small restaurants, as is currently the case under most municipal curbside recycling programs.



Recommendation 10

ÉÉQ recommends that the upcoming regulation provide for incentive measures for companies, specifically for the development of recyclable materials markets, instead of setting penalties for failure to achieve targets.



Recommendation 11

ÉÉQ recommends that the upcoming regulation provide that curbside recycling and deposit recognized management organizations be required to enter into an agreement on compensating refundable containers that will end up in the curbside recycling system.



Recommendation 12

In order to make the Bill more coherent, ÉÉQ recommends that adjustments be made to the Bill in order to improve consistency between the deposit and curbside recycling systems and the alignment of articles governing the recovery and reclaiming of residual materials.