

BC CANNABIS OPERATIONS

Notice of amendment to B.C. recycling regulations – packaging and paper product (PPP)

July 5, 2024

The BC Liquor Distribution Branch (LDB) would like to remind Cannabis Licensed Producers (LPs) of their obligations under BC's [Recycling Regulation](#).

Under the regulation, all non-medical cannabis products sold in B.C. must be covered by an approved extended producer responsibility (EPR) plan, which helps to manage the packaging and paper products (PPP) associated with those products. Under an EPR plan, the obligated producers of PPP are required to pay a fee that contributes to the operation of the provincial residential recycling program.

LPs are considered the obligated producer of PPP associated with the cannabis products they distribute and sell in British Columbia. Accordingly, LPs that do not qualify for the Small Producer Exemption (more below) are responsible for having an EPR plan that covers those products, and for paying any applicable fees.

LPs that fail to meet their obligations under the regulation may be subject to compliance and enforcement action.

Small Producer Exemption: Note that if your wholesale sales are less than one million dollars per calendar year in B.C., you produce less than one tonne of PPP annually, or you meet certain other criteria you may be exempt from producer obligations related to PPP. For details on the Small Producer Exemption, see [here](#).

EPR plan enrollment through Recycle BC

If you do not qualify for the Small Producer Exemption, and you are not already in compliance with the regulation, you are required to enroll in an EPR plan. Most obligated producers in B.C. choose to enroll in an EPR plan with Recycle BC, which is a stewardship agency that can help you to complete your PPP reporting and coordinate your annual fee.

If you have questions about registration or PPP reporting, you can contact Recycle BC toll free at 1-888-980-9549, or by emailing stewards@recyclebc.ca.

Upcoming date to note:

- **January 31, 2025:** First PPP recycling stewardship fee payment is due for 2025 services (based on quarterly payment schedule).

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Further information

To get a rough estimate of PPP fees, and for the complete list of PPP materials covered under the regulation, see the [Recycle BC fee schedule for 2024](#).

Examples of PPP materials LPs are responsible for include (but are not limited to):

- Aluminum, glass, paper, and plastic based packaging including plastic bags, pouches, and containers/jars/tubes.
- Cardboard that surrounds containers taken home by the end consumer.
- Foil and metal used on containers.
- Plastic ring toppers.

If you are not exempt from the regulation, and you would like to handle your PPP compliance yourself without using Recycle BC, please refer to B.C.'s [Recycling Regulation Guide](#). Note that this would entail developing your own EPR plan, reporting structure, and recycling stewardship program. You may contact the Ministry of Environment and Climate Change Strategy for further information at: extendedproducerresponsibility@gov.bc.ca.

Compliance

Please be reminded that LPs must comply with all applicable laws and regulations as a requirement of conducting business with the LDB.

Failure by an LP to comply with the requirements of the regulation may be an offence under s. 16 of the regulation. Further information on the regulations can be found on the B.C. Ministry of Environment and Climate Change Strategy website [here](#).

Further, where the LDB is required to meet producer obligations under the regulation because an LP fails to enroll in an EPR plan (and is not otherwise exempt from producer obligations under the regulation), the LDB may take steps against that LP under the terms of its supply agreement with the LDB.

Thank you,

LDB Vendor Relations