

September 30, 2019

Submission to the [Clean BC Plastics Action Plan](#)
 Ministry of Environment and Climate Change Strategy
 Submitted by email at plastics@gov.bc.ca

About Canadian Home Builders' Association of BC (CHBA BC)

CHBA BC represents over 2,100 member companies in the residential construction industry who work as home builders, renovators, tradespeople, suppliers, service professionals, and others. CHBA BC members are small and medium-sized businesses creating jobs and economic benefits in all areas of the province. Overall, the residential construction industry represents over 207,184 on-site and off-site jobs, \$12.6 billion in wages, and \$28.3 billion in investment value.

Overview

There are many materials that can be recycled in the construction or renovation processes. This list below is a brief overview of some of the materials that can or cannot be recycled, but given the specific focus on single-use plastics it is not exhaustive.

Recyclable Materials on Site	Possible but challenging to recycling	Not Recyclable (Garbage)
Soft plastics (bubble wrap, shrink wrap, styrofoam, etc.)	Building wrap	Contaminated or hazardous materials (drywall, etc., with clear processes for disposal)
Hard plastics (banding, etc.)	Lumber wrap	
Clean cardboard and paper	Pipes and tarps	Materials with paint, sealant or membranes
Clean wood	Certain types of foam	Painted or stained wood
Metal	Mixed materials (insulation, corrugated plastic, etc.) that require labour to separate	

Examples provided by Sea to Sky Removal, a B.C. construction waste and recycling company.

However, the supply chain of disposal or recycling locations—and the types of construction materials they accept—can vary between municipalities and regional districts. This patchwork of regulations presents significant challenges for home builders and renovators that aim to improve or grow their recycling programs, as they are classified as commercial operators and may not be able to use all available facilities due to the volume they are looking to recycle. They must also account for the labour and time to properly sort materials to be distributed to various stations in their local area that they can access.

We would not recommend that this engagement result in further silos, or permitting local governments to implement additional recycling requirements or bans at their discretion. This creates a significant amount of additional red tape for home builders, developers, and renovators that operate in more than one area. Should the need exist, we believe any programs or policies should be directed at the provincial or federal levels for maximum impact.

Below we will outline some of the challenges facing our industry and potential solutions. We acknowledge that a significant portion of construction materials can be recycled, and we can all do our part towards this common goal. However, some of the systemic barriers that residential construction employers face have to be considered before any widespread solutions can be realized at an affordable cost to homebuyers or owners.

Discussion

Bans on single-use packaging

A primary source of single-use packaging is from shipping construction materials to the construction site. Common examples of packaged materials in a new home include fixtures, appliances, decor, etc. The scale of impact and recyclable material can vary depending on the size of the project - a new home development will understandably receive a significant amount of new materials in plastic packaging compared to a single home.

If plastic packaging is banned in B.C., it is likely easier for the residential construction industry to focus on certain types of problematic materials. Materials coming from overseas would still need to be packaged in some form for safe transportation to the site. This ask is likely mirrored by other industries where packaging is not optional or challenging, and how to solve this question is best answered by the manufacturing and packaging industries on what options are available.

The benefit of provincial or federal discussions in this area would be to seek mutually-beneficial changes on a greater scale. If the ban is limited, manufacturers may focus their efforts on other market areas that don't require such a ban, a concern reflected in the [Canada-Wide Action Plan for Extended Producer Responsibility](#) (2009, p. iv).

More recycling options/Reduce single-use plastics in landfills

If there is any form of disposal ban, we suggest that the existing volume limits between residential owners and commercial operators be reviewed. As it stands, at some sites there are different protocols for single homeowners and commercial operators. While this is often related to site limits until the materials are sold or shipped elsewhere, this creates a significant difficulty and cost for businesses trying to properly dispose of materials if they are limited to what they can recycle or dispose of.

The other challenge is that products and materials must be taken to a facility that will accept them and has a negotiated contract with a buyer for those materials. By relying on these contracts and sources in the supply chain, it can lead to construction dumping or the landfill if the recycling sites are overwhelmed or refuse certain types of materials.

Or, one construction site could produce a number of recyclable materials, but then the business must visit each individual recycling site or transfer station in order to dispose of the materials. This can add significant time and cost, and is a barrier in comparison to one trip to the landfill, if they have to make multiple trips for their cardboard, metals, plastics, and household materials like carpet. Lastly, in some parts of the province, the landfill may be more accessible than transfer stations. Ensuring equitable access to these services could assist with increasing recycling rates for single-use plastics and other construction materials.

Industry leadership

Beyond single-use plastics, home builders and renovators are already exploring ways to improve recycling rates on construction sites. For example, this includes 'unbuilding,' where a construction site is disassembled and materials that can be salvaged are reused or recycled. According to [Metro Vancouver](#), approximately 80% of materials can be restored through this process. Funding or strategies to encourage the growth of these types of programs and other innovation in a voluntary capacity would be welcomed by CHBA BC in the coming years.

In addition, CHBA BC included a proposal for incentives for proper disposal of hazardous materials such as asbestos in its [B.C. Budget 2020 submission](#) to the Select Standing Committee on Finance and Government Services. Using the same framework as the [Home Renovation Tax Credit for Seniors and Persons with Disabilities](#), the proposal could mitigate some of the cost of proper disposal and create an education opportunity to inform homeowners about the necessary processes to follow.

In order to receive the incentive, proper paperwork from the disposal site should be required and a receipt of the work performed. The paperwork also encourages homeowners to work with professional contractors that will provide receipts - a key aspect to dissuade underground economy activity. When homeowners are educated, this takes place. Municipalities may be able to decrease their costs tied to illegal dumping, and potentially hazardous materials may be properly disposed of rather than left in communities.

It is very possible that this renovation proposal could also include material disposal or recycling costs for non-hazardous materials like plastics, or other hazardous materials outside of asbestos. As retrofits continue to be a target area—especially with the CleanBC goals—the other costs to the renovation, such as to encourage the recycling or proper disposal of used materials, is a logical next step in the conversations.

Follow up

Thank you for the opportunity to participate in this consultation to provide some of the existing barriers for greater recycling in the construction industry. We recognize this is an ongoing conversation and would be pleased to participate in any additional consultations, working groups, or discussions on this topic.