

September 30, 2019

Honourable George Heyman  
Minister of the Environment and Climate Change Strategy-

By email: [plastics@gov.bc.ca](mailto:plastics@gov.bc.ca)

Dear Minister Heyman:

**RE: Submission to British Columbia Ministry of Environment and Climate Change Strategy on the Plastics Action Plan – Policy Consultation Paper**

**RE: A Made-in-BC Province-wide Solution to Plastic Shopping Bags**

Canada's plastic bag manufacturers would like to submit the following as a recommended path forward on plastic shopping bags. This path forward has been guided by the work that has already been done by Councils and staff in municipalities across the Province on the issue; in particular, the District of Squamish, which has made success on a climate change and carbon reduction a priority. Squamish does not support policies on bags that undermine progress toward that goal.<sup>1</sup>

The Province of British Columbia is a leader in the fight against climate change. It has established two priority goals; to become carbon neutral by reducing greenhouse gas (GHG's) emissions and achieve zero landfill waste. These targets have been clearly set out in the 2019 Climate Change and Accountability Act [SBC 2007] Chapter 42.<sup>2</sup>

Ultimately the goal of any bag policy must be to reduce landfill volumes, carbon pollution, and litter, by changing consumer attitudes and behaviour.

**Specific Goals**

1. Craft a bag policy that helps achieve the Province's carbon reduction goals.
2. Achieve a 60-70% reduction in the number of "single-use" plastic bags and other bags while limiting carbon emissions so that the province can become carbon neutral.
3. Minimize the negative impact of paper bags on carbon emissions.
4. Solve the landfill reusable bag problem and achieve zero landfill waste.
5. Introduce a locally produced, locally recyclable reusable bag with a minimum of 40% recycled content.
6. Promote a proactive anti-littering agenda through public education and legislative tools.

**About the CPBA and a Profile of the Plastic Bag Industry in Canada**

It is a little known fact that 90% of grocery or checkout bags used by retailers across the country are produced right here in Canada under strict environmentally-friendly manufacturing conditions. These bags are not imported from Asia, like almost all reusable bags.

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<sup>1</sup> <https://squamish.ca/assets/da8efa96f9/RTC-Single-Use-Item-Reduction-Bylaw.pdf>

<sup>2</sup> Under the Climate Change Accountability Act, BC's GHG emissions are to be reduced 40% below 2007 levels by 2030, 60% by 2040 and 80% by 2050.

The majority of plastic bag manufacturers are family run businesses; small to medium sized operations. Canada's bag manufacturers provide the Canadian marketplace with every type of bag on the market – single-use paper and plastic and all types of reusable bags -- cotton, nylon, plastic PP woven and nonwoven, PET bags made from recycled water bottles.

These Canadian companies offer direct employment to 15,000 and indirect employment to another 22,000 Canadians. In total, some 37,000 Canadians will be directly affected by changes to bag policy.

Plastic shopping bags help conserve natural gas. In Canada, the bags are made from a by-product of natural gas production; a waste strand of the natural gas, ethane, which has to be burned off into the atmosphere in the processing of the gas to lower its BTU value so that it does not burn too hot as fuel in our homes.

Bags are well managed in BC. The latest data shows that 30% of all plastic shopping bags distributed in British Columbia are recycled, largely through take-back to retail programs. Coupled with the Province's high reuse rate of 65%, the bags have a combined reuse-recycle rate of 95%.

The Canadian Plastic Bag Association (the "CPBA") is an incorporated advocacy organization that represents a wide range of manufacturers and distributors of plastic shopping bags in British Columbia and throughout Canada. CPBA members are committed to operating in conformity with sound environmental practice and the principles of product stewardship and working co-operatively with retailers and government to pursue the three R's (Reduce, Reuse, Recycle).

## **I. Limiting Carbon/GHG Emissions with Smart Bag Policies to Fight Climate Change**

**Care must be taken to ensure that the Province's bag policy does not become self-defeating and undermine its climate change objectives.** As the Squamish Report on bags points out: "Although seemingly counterintuitive, there is growing concern about the greenhouse gas impacts (GHGs) of alternatives to single use plastic checkout bags." <sup>3</sup>Multiple studies of the life cycle impacts of various bags show that plastic shopping bags have the lowest global warming potential of any bag on the market during production, transport, end of life and reliance fossil fuels. This holds true whether the plastic shopping bag is used just once or reused multiple times. <sup>4</sup> Part of their beneficial environmental superiority relates to their 65% reuse primarily to manage household waste so fewer kitchen catcher trash bags, which are 50% thicker are used.

**These studies clearly define the calculated greenhouse gas impact of each bag and their "environmental efficiency". Both the City of Victoria and the District of Squamish used the following from the U.K. Government Life Cycle Assessment to guide their deliberations.** To achieve the same environmental efficiency of a plastic shopping bag used just once: a paper bag must be reused 3 times; a plastic non-woven polypropylene bag needs to be reused 11 times; and a cotton bag must be reused 131 times.

**A total ban on plastic bags will only supercharge greenhouse gas emissions and undermine the Province's carbon reduction targets.** Plastic bag bans lead to increased consumption of single use paper bags which produce far more greenhouse gases. Consequently, paper bags are not an effective substitute for plastic bags. Paper bags produce 4 times more carbon in their manufacture than plastic shopping bags and 7 times more

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<sup>3</sup> <https://squamish.ca/assets/da8efa96f9/RTC-Single-Use-Item-Reduction-Bylaw.pdf>

<sup>4</sup> Kimmel, Sc.D., Robert M., "Life Cycle Assessment of Grocery Bags in Common Use in the United States" (2014). Environmental Studies. [https://tigerprints.clemson.edu/cudp\\_environment/6](https://tigerprints.clemson.edu/cudp_environment/6) and Quebec Government LCA <https://monsacintelligent.ca/quebec-lifecycle-analysis-of-shopping-bags-in-quebec/?lang=en> and Danish Government LCA <https://www2.mst.dk/udgiv/publications/2018/02/978-87-93614-73-4.pdf> and <https://plastics.americanchemistry.com/Life-Cycle-Assessment-for-Three-Types-of-Grocery-Bags.pdf>

carbon in their transport. The Clemson study shows that the Global Warming Potential of paper bags is 3.3 to 5.4 times that of plastic retail bags.<sup>5</sup> The Quebec government LCA showed that the paper bag is the least performing bag with 4 to 28 times greater potential impacts than the conventional plastic bag.<sup>6</sup> Further, a [2018 lifecycle assessment of grocery bags](#) completed by Denmark's Environmental Protection Agency calculates that a person needs to use a paper bag 43 times before its environmental impact is less than the environmental impact of using a plastic grocery bag once (page 17 of the report).

**“Banning plastic bags has been shown to lead to an increase in paper bag use. In order to prioritize and limit GHG emissions, an increase in the use of paper bags should be avoided at all costs. Therefore, multiple bag types should be offered.”** The District of Squamish was very clear in terms of prioritizing climate change as the guiding principle of bag policy in the September 2019 report.<sup>7</sup> Ireland's tax on plastic bags led to a 400% increase in paper bags.<sup>8</sup> In California, cities that banned plastic bags saw a surge in the use of paper bags, which resulted in about 80 million pounds of extra paper trash per year.<sup>9</sup>

**Reduction strategies using bag fees are more effective than bans in reducing consumption, and in permanently moving consumers away from disposable bags (plastic and paper).** Because they take into account the reuse of plastic shopping bags to manage household waste and therefore avoid the need to purchase thicker plastic kitchen catchers when the lighter bags are removed from the market. When the City of Toronto introduced a 5-cent bag fee, the number of bags distributed declined by 53% and use of plastic reusable bags soared.<sup>10</sup> Bag fees trigger massive spikes in plastic trash bag consumption as much as a 120% increase.

## 2. Recommended Strategy to Permanently Reduce Plastic Bag Usage

It is recommended that the most effective strategy to reduce usage of single-use bags and permanently change consumer behaviour toward more sustainable options is an aggressive fee-based reduction for all disposable bags – **plastic and paper**. The use of “environmental efficiency” fees is a strong education and public awareness tool for consumers on the impact their bag habits on the planet and climate change.

### The Efficiency Fees

The Province's carbon reduction strategy is paramount so the fee structure should work to limit greenhouse gas emissions. The “efficiency fees” would line up with the amount of greenhouse gas emissions each type of bag emits into the atmosphere; its environmental efficiency. The idea is that people would be charged an environmental efficiency fee for each bag they use. These fees would reflect to the global warming potential of each bag using the U.K. Government LCA GHG impact evaluation.

Because plastic bags have the lowest environmental impact, they have the lowest fee. Fees for paper bags would be three times more than plastic bags because paper bags need three reuses to be as environmentally efficient as a single-use plastic bag used just once and the reusable bag 11-25 times the fee for the plastic shopping bag. The usual exemptions related to public health should be a put in place as well. Plastic bags would still be available for meat, seafood, newspapers, baked goods and a variety of other products.

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<sup>5</sup> [https://tigerprints.clemson.edu/cudp\\_environment/6](https://tigerprints.clemson.edu/cudp_environment/6)

<sup>6</sup> [https://monsacintelligent.ca/wp-content/uploads/2018/03/ENGLISH\\_FINAL-Quebec-LCA-Highlights.pdf](https://monsacintelligent.ca/wp-content/uploads/2018/03/ENGLISH_FINAL-Quebec-LCA-Highlights.pdf)

<sup>7</sup> <https://squamish.ca/assets/da8efa96f9/RTC-Single-Use-Item-Reduction-Bylaw.pdf>

<sup>8</sup> <http://www.allaboutbags.ca/>

<sup>9</sup> **Globe and Mail** article « ... Sorry, banning plastic bags won't save our planet ... »

<https://www.theglobeandmail.com/opinion/article-sorry-banning-plastic-bags-wont-save-our-planet/>

### How it would work

Businesses will continue with their ongoing instore public education, “do-you-need-a-bag” programs and promote the adoption and use of reusable bags.

- \* Plastic bags – a minimum of \$0.10 cents per bag (**Will encourage reuse as a trash bag**)
- \* Paper bags – a minimum of \$0.30 cents per bag (**Representative of the relative negative environmental impact**)
- \* Reusable bags – a minimum of \$2.50 per bag (**Price point is large enough to avoid the market being flooded with non-recyclable cheap reusables which could easily become a new form of single use bags.**)

### *Role for Retailers – Tracking Reductions and Fees*

**Tracking Results:** Retailers will be asked to track bag sales and report to government on the reduction in the number of bags distributed. A Bag Reduction Task Force involving retailers, the bag industry and recyclers should be created to monitor and deal with issues.

**Redirecting Bags Fees to Help the Local Environment:** Since retailers will be collecting millions more dollars with the fees from bag sales, it is strongly recommended that 50 percent of the fees be used to fund anti-littering public education programs in the communities where retailers do business as well as use the fees to fund operations to clean up lost fishing gear that kills so many marine animals in BC coastal waters. Seventy percent of large plastic in the ocean is ghost fishing nets; nets lost or discarded. Each net is a floating death trap killing thousands of marine animals.<sup>11</sup>

### **3. Solving the Reusable Bag Landfill Problem to Achieve Zero Waste**

Reusable bags cannot be recycled anywhere in North America. Eventually they are thrown out as garbage and end up clogging landfills across the Province. Even bags that claim to be recyclable cannot be recycled. Given that the average consumer owns 5.1 reusable bags, this means millions of tonnes of plastic being sent to landfill.<sup>12</sup> There are a number of reasons why they are not being recycled. The first is the cost to deconstruct the bag. Engineered to be stronger and last longer, reusable bags are made using multiple materials. Deconstructing the bags to separate the different materials is very costly. The second reason is the lack of equipment to actually do it. Most of the textile industry and its equipment to do the job has migrated to Asia.

*Proposed Solution: Make a made-in-BC 100% Locally Recyclable Reusable Bag with 40% Recycled Content*

- (i) The province should consider a landfill ban on plastic, non-recyclable reusable bags.
- (ii) **Mandate the production of Locally Made Plastic Reusable Bag, 100% Recyclable Locally**
  - **50 micron (2ml) HDPE or LDPE**
  - **40% recycled content**

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<sup>11</sup> [https://www.worldanimalprotection.org/sites/default/files/int\\_files/sea-change-campaign-tackling-ghost-fishing-gear\\_0.pdf](https://www.worldanimalprotection.org/sites/default/files/int_files/sea-change-campaign-tackling-ghost-fishing-gear_0.pdf)

<sup>12</sup> Kimmel, Sc.D., Robert M., "Life Cycle Assessment of Grocery Bags in Common Use in the United States" (2014). Environmental Studies. [https://tigerprints.clemson.edu/cudp\\_environment/6](https://tigerprints.clemson.edu/cudp_environment/6)

- **Designed for 100 reuses**

Reusable bag research also shows that consumers tend to use their non-woven polypropylene reusable bags on average only 15 times.<sup>13</sup>

#### **4. Minimizing the Litter Risk with Anti-Littering By-Laws and Public Education**

Until recently, litter has not been deemed a policy priority for governments. But that has changed with recent media coverage of ocean plastic pollution. The province already has a litter law on the books, British Columbia Litter Act - [RSBC 1979] CHAPTER 239. And most BC municipalities have only anti-dumping by-laws. One exception is the City of Langley which has township by-laws to deter littering; a Highway and Traffic Bylaw and an Untidy and Unsightly Premises Bylaw puts responsibility in the hands of property owners or occupiers of real property.

The plastics industry has worked hard over the years to minimize plastic bag litter. The largest compilation of North American municipal litter audits (489 audits and 103,000 litter data observations) shows progress; that plastic shopping bags are a tiny fraction of litter at 0.4% of total litter. The Jambeck study shows that Canada is responsible for only 0.01% of ocean plastics.

*Recommendation #1:* There is a need for public education to remind BCers of their role in protecting the environment by not littering. This can be funded by part of the millions of dollars retailers will be making with the new fees on all carry bags. Litter is a people problem, not a material problem.

*Recommendation #2:* There is a need for anti-littering by-laws that actually work to stop litter from reaching our waterways.

Recommendation: That the province mandate that each city introduce an anti-littering by-law tied to real property and enforce it with fines for non-compliance. This will help to reduce litter that gets into the sewer system and makes enforcement very easy. These Untidy and Unsightly Premises Bylaws would make owners or the occupier of any commercial or residential property responsible to ensure that the property outside their story and the area within 20 feet is free of litter.

Yours truly,



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