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Solid Waste Diversion
Plastics Action Plan

Ministry of Environment and Climate Change Strategy
Recycling Regulation Amendments
PO Box 9341 Stn Prov Govt
Victoria BC, V8W 9M1
via e-mail: plastics@gov.bc.ca

RE: PLASTICS ACTION PLAN POLICY CONSULTATION PAPER

Thank you for the opportunity to provide input on the Plastics Action Plan Policy Consultation Paper. Due to timing constraints, the following comments have been compiled by Capital Regional District (CRD) staff and will subsequently be shared with the CRD Solid Waste Advisory Committee, Parks & Environment Committee and CRD Board at meetings held in October and November.

Responses are presented below in the order of the proposed actions and questions in the four connected areas outlined in the policy consultation paper.

1. ***Bans on single-use packaging:*** *determining which types of plastic packaging to phase out altogether, as well as any necessary exemptions, such as those for health, safety and accessibility, to keep products available for the people who need them*

Q: Do you think bans on plastic packaging should be implemented in BC?

A: CRD staff support, in principle, the implementation of plastic packaging bans in BC. A phased approach is recommended, starting with single-use items that have readily available alternatives (such as plastic bags and foam packaging). Materials that cannot be recycled or composted should be phased out.

Q: What types of bans should be considered?

A: The CRD has implemented numerous landfill disposal bans since 1991 that have been very successful at diverting materials; however, our landfill still receives banned materials. Disposal bans focus on diversion for recycling, whereas bans on sales or use of materials would be more effective policy tools to prevent waste in the first place, which is the highest priority in the pollution prevention hierarchy. There is an opportunity for local governments, regional districts and the provincial government to collaborate on banning materials, based on their respective authorities.

Q: Should local governments be given the authority to ban problematic plastic items in their communities?

A: Staff support obtaining clarity on municipal jurisdiction and the role of regional districts in managing and regulating single-use items.

Q: Are there bans best suited for implementation at the federal, provincial or local government level?

A: A harmonized regulatory approach between levels of government would provide consistency and reduce confusion for the public and businesses.

Q: What plastic packaging products should be considered?

A: Single-use plastics comprise more than packaging; some are products that support food packaging. We suggest considering a broader list of single-use items that extends beyond items used to package a product. For example, the European Union includes plastic cotton swabs, cutlery, plates, straws, drink stirrers and balloon sticks and products made from oxo-degradable plastics.

Q: If a ban were applied, how should exemptions be considered?

A: All CRD disposal bans include exemptions based on stakeholder feedback. Our experience has shown that exemptions should consider criteria such as the availability of alternatives and avoidance of undue hardship.

2. *Dramatically reduce single-use plastics in landfills and waterways: requiring producers to take responsibility for more plastic products, ensuring more single-use items like sandwich bags, straws and cutlery get recycled*

Q: Do you have comments or suggestions regarding the ministry's proposal to include packaging-like products in the Recycling Regulation?

A: Over the years, the CRD Board has supported Extended Producer Responsibility (EPR) programs in principle. In 2017, the Board sent a letter to provincial authorities that identified the failure to include the industrial, commercial and institutional (ICI) sector in the BC Recycling Regulation for the management of packaging and paper products (PPP). Staff support adding more recyclable items to the BC Recycling Regulation and extending producer responsibility for such items and PPP to the ICI sector. EPR programs should cover the full costs of managing products rather than being subsidized by taxpayers, as conveyed in previous correspondence by the CRD Board and staff.

Q: Do you have comments or suggestions regarding the ministry's proposal to add single-use item to the Recycling Regulation?

A: EPR programs are meant to encourage better design but in reality seem to focus on recycling. Staff propose putting more emphasis on the higher-tier levels of the pollution prevention hierarchy through design directives and incentives towards reduction, reuse and repair.

3. **Plastic bottle and beverage container returns:** *expanding the deposit-refund system to cover all beverage containers—including milk and milk-substitutes—with a 10-cent refundable deposit, keeping millions more containers out of landfills and waterways*

Q: Do you have comments or suggestions on adding milk containers and standardizing the refund?

A: At its meeting of August 14, 2019, the CRD Board endorsed the five recommendations in the Ocean Legacy Foundation report. A letter signed by the Board Chair was sent to the Minister of Environment and Members of the Legislative Assembly representing constituencies in the Capital Region in support of expanding the deposit refund system to cover all beverage containers (including milk and milk substitute containers). Ocean Legacy's report includes a review of global deposit return systems for beverage containers that shows that higher deposit rates yield better return rates. Staff support creating a uniform 10-cent deposit refund for all containers, followed by a program review in two years (as proposed in your policy consultation paper) to determine the success rate of the proposed increase or a move to a higher deposit.

Q: Do you have comments or suggestions on the ministry's proposal to allow refunds to be electronic?

A: Staff are in support of refunds that are paid electronically or in an alternative form of cash; however, it is important to retain cash refunds for those who do not have access to alternative systems.

4. **Reducing plastic waste overall:** *supporting effective ways to prevent plastic waste in the first place and making sure recycled plastic is reused effectively*

Q: What should be considered in the development of a national recycling content standard and any associated targets?

A: We appreciate the work done through the Canada-wide Action Plan on Zero Plastic Waste to develop national performance requirements and standards for plastics. Our staff consider the development of standards for bio-based plastic products that are marketed as compostable or biodegradable a priority.

Q: Do you have any other comments?

A: The most effective way to prevent plastic (and other) waste is the implementation of the Plastics Action Plan according to the pollution prevention hierarchy.

Thank you for considering our input.

Yours truly,



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cc: Robert Lapham, Chief Administrative Officer, CRD
Russ Smith, Senior Manager, Environmental Resource Management