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Ministry of Environment & Climate Strategy – Recycling Regulation Amendments
PO Box 9341 Stn Prov Govt
Victoria, BC V8W 9M1

Re: Plastics Action Plan Feedback

This is a letter of comment to the B.C. Plastics Action Plan on behalf of the Cariboo Chilcotin Conservation Society.

Bans on Single-Use Packaging

1. Do you think bans on plastic packaging should be implemented in BC? What plastic packaging products are a priority for B.C. to ban?

Legislative bans on some plastic packaging may be effective at reducing waste. Styrofoam products in particular are unnecessary and the most difficult to manage at the end of its use as well as a burden on the natural environment.

2. What types of bans should be considered (examples include bans on sale of a certain type of packaging or ban on use of a certain type, or bans on disposal)?

Restrict sale of the product to force retailers to look for alternative, sustainable options. Strict bans may have a harmful effect through illegal dumping and alternative disposal. Recycling streams for alternative products may not be in place or adequately understood by consumers resulting in improper handling and disposal.

3. If a ban was applied, how should exemptions be considered?

Apply tax for plastic use so retailers and consumers consider alternative options.

4. Bans can be implemented in some form by all levels of government due to the different regulatory powers in place. Are there bans best suited for implementation at the federal, provincial or local government level? Should local governments be given the authority to ban problematic plastic items in their community? What types of bans should be considered?

Bans and restrictions should come from all levels of government. Local government should be given authority to ban problematic products as needed to encourage a waste reduction culture within their communities. Types of bans may be dependent on the availability of local waste management streams.

More Recycling Options

1. Do you have comments or suggestions regarding the ministry's proposal to include packaging-like products in the Recycling Regulation? Are there any packaging-like products you believe should be exempt from the Recycling Regulation?

Including all products in the Recycling Regulation could be a valuable method for diverting waste from the landfill. These products should be accepted but use should not be encouraged. It may be useful to regulate costs or highlight alternative products to inspire retailers to offer them and consumers to use them. Cling wrap products offer a particular challenge for recycling as it is usually covered in food, making it difficult to manage. Multi laminate plastics are considerably difficult to recycle, if even at all. Making this clear to the consumer on the packaging would be helpful in educating the public. Increased federal regulation of the 'recycling logo' on all packaging and products would assist in this case. If more items get added to the recycling stream, we need to ensure they ARE recyclable!

2. Do you have comments or suggestions regarding the ministry's proposal to add single-use items to the Recycling Regulation? Are there any single-use items you feel should be exempt from the Recycling Regulation?

Styrofoam and all #7 plastics. If you plan to divert these through a waste-to-energy stream, then we need to advertise it as such. E.g. this bin accepts all junk plastics that cannot be recycled however will be used as a fuel alternative to coal.

Expanding Plastic Bottle and Beverage Container Returns

1. Do you have comments or suggestions on the ministry's proposal to include milk and milk substitutes in the beverage container deposit-refund schedule?

If these containers become worth money, it will offer incentive for their return, diverting them from the landfill and ensuring proper handling for recycling.

2. Do you have comments or suggestions on the ministry's proposal to create a uniform 10 cent deposit-refund for all beverage containers?

10 cents may not be enough of an incentive for people to return their beverage containers. Audits show plenty of refundables in the waste stream on a regular basis. 25 cents may offer better incentive for return.

3. Do you have comments or suggestions on the ministry's proposal to allow refunds to be electronic and paid in an alternative form of cash (e-transfer, cheque, in-store credit, charitable donation, or similar alternatives)?

This is a great idea. Offering convenient options for people to return their plastic bottles and beverage containers will increase the likelihood of participation.

Reducing Plastics Overall

1. What should B.C. consider in the development of a national standard on recycled content and any associated targets?

Mandate 10% or more post-consumer plastics in all new plastics made. Create a market for recyclable plastics as opposed to virgin plastics.

2. Do you have comments or suggestions on any related provincial policies or actions?

The real key here is reduction of our waste in general. More and more our sustainability education focuses on reducing instead of recycling. The recycling system is constantly changing depending on market value and there are ripple effects when a small part of the recycling system suffers. This constant change makes education and compliance very difficult. Reduce, reduce, reduce our waste; period!

Plastic in the landfill is not nearly as much of an issue as plastic in the natural environment. These plastic issues are such a hot topic because of the sea animals we see wrapped in them, the tainted look they give a beautiful forest and the toxins that our now in our ecosystems. More action is needed and heavier fines on littering.