

September 30th 2019

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

Sent via email to: Plastics@gov.bc.ca

To Whom It May Concern:

On behalf of the Carton Council of Canada, I am writing in response to the Plastics Action Plan: Policy Consultation Paper released by the Ministry of the Environment and Climate Change Strategy (MECCS) on July 25th, 2019.

The Carton Council of Canada (CCC) is a group of carton packaging manufacturers united to deliver long-term collaborative solutions in order to divert valuable food and beverage cartons from disposal. Since our formation in 2010, we have been driving concerted actions in collaboration with municipalities, sorting facilities, the waste management industry and schools with the goal to further increase carton collection and recycling. A few examples of the initiatives we have deployed in recent years to advance this goal in British Columbia includes partnering with Recycle BC and Encorp Pacific, respectively, to deploy consumer awareness campaigns to grow carton recycling in the province. To learn more about our efforts please visit www.recyclecartons.ca.

CCC recognizes the importance and urgent need to fight marine pollution and littering. We believe that solving the significant and broad issue of litter requires the advancement of recycling solutions combined with consumer education.

Sincerely,



Isabelle Faucher
Managing Director, Carton Council Canada

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for news and information about carton recycling and
our activities.

Linked 

Disposal Bans

To facilitate further resource recovery, the CCC supports disposal bans for materials for which sustainable end-markets exist, including cartons. This would serve as an effective tool to increase waste diversion particularly in the industrial, commercial and institutional (IC&I) sector, where data on waste diversion is lacking. For example, Metro Vancouver has implemented several disposal bans for recyclable materials at its disposal facilities. If recyclable materials are detected in a load, a surcharge is applied.¹ Avoiding this penalty creates an incentive for waste haulers to make sure proper source separation and sorting systems are in place. The provincial government should consider implementing province-wide disposal bans for recyclable materials managed in established recycling programs.

Bans to regulate the sale or use/ Expanding Producer Responsibility for Packaging-like Products and Single-Use Items

Unlike loose straws, aseptic carton straws (i.e. drink box straws) are specially designed to serve as an integral part of the packaging and are integrated at the manufacturing stage. In addition, they embody a wide array of functional benefits for consumers. These specially designed straws are part and parcel of the finished package and are attached to the carton packages with food-grade adhesive.

These fit for purpose straws permit consumers (particularly children, the elderly and others who may have physical limitations) to access the liquid food and beverage content in a hygienic, practical, and economical manner. Compared to other available alternatives that serve the same purpose, the small packages with straws use less plastic and have a lower climate impact².

As you are likely aware, “single-use straws packaged and sealed together with drinks” (e.g. drink box straws) are excluded from the City of Vancouver’s forthcoming straw ban by-law, which is scheduled to be presented to City Council by November 30th³.

When pushed into the package after consumption, the aseptic carton straw goes through the recycling process along with the carton package, and as a result, it doesn’t get lost or become litter. Discussions with several Material Recovery Facilities (MRFs) and a couple of carton packaging recyclers confirm that having the straw inside the package doesn’t cause operational issues for them. Beginning in September of this year, we have worked with Encorp Pacific to promote this “Back in the Pack message⁴.

¹ <http://www.metrovancouver.org/services/solid-waste/bylaws-regulations/banned-materials/Pages/default.aspx>

² Life-Cycle analysis study available upon request

³ Email communication, Julie LeBlanc, Project Management Coordinator, Zero Waste & Resource Recovery, Engineering Service, City of Vancouver. September 27th, 2019.

⁴ Information regarding “Back in the Pack” can be found on Encorp Pacific’s [web site](#) and under their [FAQ](#). Their complete communication plan pertaining to the Back in the Pack message is available in Appendix A of this submission.

It is worth noting that CCC member companies who use plastic straws as part of their package have made commitments to transition to a paper-based straw⁵. But the development of paper straws to fit for purpose and subsequent deployment will require a substantial amount of time.

Given the Back in the Pak solution, which ensures that drink box straws are managed with the empty container (as opposed to requiring separate management of the straw), and given Encorp Pacific's support for this solution, we recommend that drink box straws not be added to the Recycling Regulation.

Expanding Plastic Bottle and Beverage Container Returns

The collection of used cartons in British Columbia is currently split between two systems, based on their content:

- Juice, water, and other non-dairy beverage cartons are caught under the beverage container deposit system managed by Encorp Pacific;
- Milk, milk substitute and non-beverage cartons (i.e. soup, broth, etc.) generated by the residential sector are caught under the Recycling Regulation and managed under Recycle BC's residential recycling program since 2014.

From 2016 to 2018, we worked jointly with RecycleBC to deploy a consumer campaign reminding consumer to recycle their milk, soup, and other beverage cartons in their blue bin. In this sense, expanding the deposit-refund system to include milk and milk containers is likely to cause a high level of confusion amongst consumers, at least initially.

Should the Ministry choose to proceed with this policy change, we are concerned that this will result in further fragmentation of the used carton stream, further challenging its effective and efficient recycling. Specifically, given that beverages represent the vast majority of products packaged in cartons (approximately 95%), we request assurances from the Ministry that the remaining non-beverage carton stream continues to be collected for recycling, and that the stewards of these containers are not unfairly penalized with respect to the fees charged on those containers by the Producer Responsibility Organization.

Should this policy change move ahead, we would also like to stress the importance of establishing clear definitions, for example by clarifying whether non ready-to-drink products, such as cream, are included or excluded from the deposit program.

Lastly, we support the MECCS's proposal to allow refunds to be electronic and paid in an alternative form of cash, in order to facilitate the consumer's experience.

In closing, Carton Council Canada remains committed to increasing the sustainable recycling of food and beverage cartons – mission which we believe is more relevant than ever. We thank the Ministry of Environment and Climate Change Strategy for the opportunity to provide feedback on this plan.

⁵ See for example: <https://www.tetrapak.com/about/newsarchive/first-carton-packaging-company-to-launch-paper-straws> and <https://www.sig.biz/fr/media/press-releases/sig-leads-the-beverage-carton-industry-with-the-first-paper-straw-solution>

Appendix A – Encorp Pacific Communications Plan Pertaining to Drink Box Straws



Back in the Pack

The following is Return-It's plan to promote the "Back in the Pack" initiative.

Website

Information regarding "Back in the Pack" can be found in our website in the following links

- Deposits, Fees, & Container Types <https://www.return-it.ca/beverage/products/>



READ MORE ⓘ

Drink Box

Caps on, push the straws in

SIZE	CRF FEE	DEPOSIT / REFUND
0 – 500mL	NO FEE	5¢
501mL – 1L	5¢	5¢

- Frequently asked questions <https://www.return-it.ca/cfm/index.cfm?it=913&ld=212&se=38,23>



The screenshot shows the Return-It website interface. At the top, there is a blue navigation bar with the Return-It logo on the left and 'Locations' and 'Beverage' links on the right. Below the navigation bar, the breadcrumb trail reads 'Home / Beverage / Frequently Asked Questions'. The main heading is 'General Return-It Recycling Questions'. A question is listed: 'Do I have to remove the straws from my containers?'. Below the question, a small text block explains: 'For containers that have a straw, like juice boxes or pouches, push the straw back in the empty pack when you are finished with your drink before disposing of. This step will ensure all parts of the package go through the proper recycling process.' Below this text is a large graphic with the text 'PUSH THE STRAW BACK THEN RECYCLE THE PACK' and 'PUSH BACK & RECYCLE'. The graphic shows several beverage containers (juice boxes and pouches) with arrows indicating the straw being pushed back into the pack. Logos for 'EARTH COUNCIL' and 'Return-It' are visible at the bottom of the graphic.

ENCORP PACIFIC (CANADA) 100 - 4259 Canada Way, Burnaby, BC V5G 4Y2, T: 1.800.330.9767, F: 604.473.2411, return-it.ca



E-mail distribution

Information about “Back in the Pack” will be included in our next email distribution to all schools participating in our recycling program.

Forum newsletter

An article with relevant information will be posted on our “Fall Issue” of our forum newsletter. The forum newsletter is distributed within the organization and operators.

News section – School program

An article with relevant information will be posted in the news section of our school program. All school participating in our program has access to this news section.

Social Media

We will create a post around “Back in the Pack” and share it through our social media channels on Facebook, Twitter and Instagram

Depot Network

“Back in the Pack” creative will be included as part of our rotating screens on the customer-facing screen in all of the depots in the network

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