

September 30, 2019

By Email: ENV.Minister@gov.bc.ca
Plastics@gov.bc.ca

Honourable George Heyman
Minister of Environment and Climate Change Strategy
Government of British Columbia
PO Box 9047, Stn Prov Govt
Room 112, Parliament Buildings
Victoria, BC V8W 9E2

RE: Clean BC Plastics Action Plan, Policy Consultation Paper – Cement Industry Input

Dear Minister:

Thank you for the opportunity to comment on the Ministry of Environment and Climate Change Strategy's "Plastics Action Plan: Policy Consultation Paper" released on July 25, 2019 as part of the consultation on Clean BC.

Plastic Bans and Waste Prevention

We agree with statements in the Plastics Action Plan that bans "*can be an effective policy tool to prevent plastic waste from occurring in the first place*", and to drive recyclable plastics away from landfills and instead divert them to further re-use, processing and/or recycling facilities. Those bans can be implemented through a variety of options, including the establishment of levies or fees at the point of sale, banning the sale of materials, or prohibiting the disposal of plastics at disposal facilities.

Waste reduction should be the first priority and while we believe that some disposal bans may be difficult to enforce, it does not mean that work should not be done towards having them implemented. We also agree that it is important to consider all impacts and ensure that viable and pragmatic alternatives are available. The Action Plan notes that a "*single-use paper bag can require up to four times as much energy to manufacture and produces two times the greenhouse gas emissions when compared to a single-use plastic bag*" and one therefore should be cognisant of the use of life-cycle assessments (LCA) to compare impacts and help with policy decisions.

Expanding Recycling and Recovery

The "5Rs" hierarchy has been widely understood to help guide the development of policy with respect to the handling of end-of-life materials. We strongly support this approach:

- (1) Reduce,
- (2) Reuse,
- (3) Recycle,
- (4) energy Recovery, and
- (5) Residuals management (Landfilling)

While society is demanding an increased focus on the first 3Rs, and in particular waste reduction, we find that solid waste facility owners and operators (both waste transfer stations as well as landfill owners) are at times incentivized towards additional waste tonnages. Additional waste leads to overall lowered unit tipping fees. Of the 5Rs waste hierarchy, we believe that there should be a dramatic increase in focus on **(1) Reduce** and also a much stronger dis-incentive to **(5) Residuals management / Landfilling**. Waste reduction and Zero Waste must become a top priority across all of waste management. And landfilling must truly become a last resort.

In the UK, the Landfill Tax applies a fee of £88.95 per tonne of active waste (equivalent to approximately CAN \$145). This is over and above the waste tipping fee. In the UK this has the effect of providing an enormous financial dis-incentive to landfilling and helping to direct waste materials to the other categories in the waste hierarchy. Contrast this to Vancouver, where the waste tipping fee decreases¹ as truck loads increase in weight.

The BC cement industry believes that it can play an important role by co-processing waste with energy recovery in cement kilns as a waste management solution for non-recyclable waste. This allows for: (a) displacement of coal or other fossil fuels, and (b) in certain instances, the reduction in the use of some virgin feedstock. A case could be made that use of waste fuels in a cement kiln would fall into an additional tier in the hierarchy, in between **(3) Recycling** and **(4) energy Recovery**. Overall, this will reduce greenhouse gas emissions.

We believe that all wastes destined for landfill should be assessed to determine whether there are wastes that have a suitable energy value and could instead be diverted up the hierarchy. Energy recovery opportunities (in existing cement kilns; not new, purpose-built facilities) could be used in the interim as local recycling processes are developed, or until materials are banned and we move towards alternative solutions. In this respect, cement kilns can help to keep energy and material flows in economic circulation rather than landfilling, as we transition towards Zero Waste.

EPR programs take responsibility for the collection, processing and recycling of plastics away from government and to the private sector. However, recent stories in the media on the challenges of recycling plastics overseas have highlighted the importance of ensuring that materials collected for the purpose of recycling are indeed ultimately recycled. As a BC manufacturing industry, our position is that greater emphasis should be placed on local processing of materials in order to ensure that they are beneficially re-used. As noted above, our industry believes that in certain cases this should include energy and material recovery, with the use of otherwise non-recyclable plastics as alternative fuels. It is important that materials are handled closer to their point of generation and that we avoid shipping materials great distances, particularly overseas.

Conclusion

Thank you for the opportunity to provide input on the Plastics Action Plan. We look forward to continuing to work with you and your team in the Ministry of Environment & Climate Change Strategy on further development of policy to address plastics.

Sincerely,



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Vice President, Environment and Marketing (Western Region)
Cement Association of Canada

cc: Mark Zacharias, Deputy Minister, Mark.Zacharias@gov.bc.ca

¹ The waste tipping fee in Vancouver in 2019 is set at \$142 per tonne for loads under 1 tonne in weight, but progressively reduces to a low of \$90 per tonne for loads over 9 tonnes.