



September 23, 2019

CleanBC

By email to: plastics@gov.bc.ca

To whom it may concern,

RE: Clean BC Plastics Action Plan – Consultation Response

At its regular meeting of September 9, 2019, Campbell River City Council considered the Clean BC plastics consultation paper and voted to endorse and submit the comments contained within this letter. These comments respond to the eleven questions set out within the consultation paper and represent the official position of the City of Campbell River.

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

The City supports increased regulation of plastic packaging, including bans for plastic packaging under the Environmental Management Act.

- 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)?

The City supports a ban on certain types of plastic packaging for things relating to the food industry, grocery sales, and consumer items.

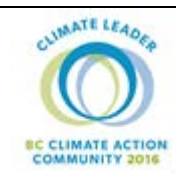
- 3) If a ban was applied, how should exemptions be considered?

While some industries such as the healthcare sector may be exempted from a ban, there could be a mechanism established to consider case-by-case exemptions where evidence can be shown that no other packaging type than plastic would be suitable. Exempted sectors or products might still be required to adhere to other rules, such as being limited to use of particular plastics that can be readily recycled with like products.

Clearly some uses such as sterile packaging for medical materials should be exempted. Non-packaging related and general-purpose plastic items such as those described on page 7 of the

Long Range Planning & Sustainability Department

301 St. Ann's Road, Campbell River BC V9W 4C7
Telephone: 250.286.5700; Fax: 250.286.5760



consultation paper should also remain available for sale for purposes such as garbage can liners, domestic food storage, dog sanitation, etc.

- 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?

The City considers that regulation of plastics, including any bans, should remain a provincial and/or federal responsibility.

- 5) 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?

The City supports regulation of plastics to ensure consistent use of similarly-recyclable materials for like products, including packaging.

- 6) 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?

The City supports adding single use items to the Recycling Regulation where non-plastic alternatives are readily available.

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

The City supports this.

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

The City supports this.

- 9) 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)?

The City supports this.

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

The City supports the development of recycled content performance standards being led by the federal government.

Consideration of ultimate disposal of products, including measure to prevent outsourcing disposal to other countries with lesser environmental standards.

Consideration of lifecycle energy budgets of both plastic packaging and the alternative forms of packaging.

Conversion of plastic products into other products should be considered, and targets established accordingly.

11) Do you have comments or suggestions on any related provincial policies or actions?

The City recommends that policies and actions should be science- and data-based, and targeted at achieving real and measurable outcomes, while avoiding symbolic gestures of little meaningful impact.

Please contact the undersigned should you wish any further clarification or discussion.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Chris Osborne', with a long horizontal flourish extending to the right.

Chris Osborne
Acting Long Range Planning & Sustainability Supervisor
250-286-5745
chris.osborne@campbellriver.ca