

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

September 30, 2019

File Number: 5380-01  
Environmental Services

Dear Ministry of Environment and Climate Change Strategy,

**Re: City of Chilliwack - Plastics Action Plan Consultation**

The City of Chilliwack is supportive of the Province's investigation into better managing plastic materials and their associated wastes. Below is the City's feedback on the Province's proposals, as outlined in the Plastics Action Plan Policy Consultation Paper.

**1. Bans on Single-Use Packaging**

**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 is supportive of bans on plastic packaging materials that are currently not recyclable. These include the "Other Flexible Plastic Packaging" category, which is being transformed into a refuse derived fuel source. Air quality is of paramount importance to residents of the Fraser Valley, which is a confined airshed. The City is concerned that efforts to divert these materials from landfilling may result in decreased air quality for its residents. Recycle BC has thus far been unable to provide evidence proving that stack emissions from its refuse derived fuel are cleaner than the fuel sources it is purported to displace.

The City would also support provincial bans on single-use items, such as checkout bags, foam cups and containers, straws, and disposable cups, and other plastic take-out containers, as well as single-use plastic products that cause demonstrable harm to the environment. The City would also support the Province expanding the scope of the Action Plan to include non-plastic single-use items that cause demonstrable harm to the environment, such as regulatory measures to reduce disposable paper beverage cups.

**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)?**

Bans on the sale or distribution of certain types of packaging would be most effective at reducing the prevalence of the particular plastic packaging type in the environment. Disposal bans would only serve to download management of the waste stream onto local governments, resulting in varying levels of effectiveness across the province based on resources available to enforce them. However, it is imperative that any sale or distribution bans take into consideration the potential impacts of alternatives that may be used to replace the banned items, to avoid unintended consequences.

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

Exemptions should only be considered in situations where there is a medical reason for the use of the particular plastic item and a reusable alternative is not a viable option. Frequent granting of exemptions to bans will create opportunities for “loopholes”, reducing the effectiveness of the ban.

**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 on plastic packaging and single-use items are best suited for implementation at higher levels of government in order to create uniformity for businesses and residents across regions. However, local governments should still be given the authority to enact bans or other regulatory measures on plastic or other single-use items in situations where the item is causing environmental harm or creating an economic burden to manage within the community.

The City believes that the Province should explore bans on the sale or disbursement of Other Flexible Plastic Packaging and single-use items.

**2. More Recycling Options**

**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 is supportive of the Province’s proposal to include packaging-like products in the Recycling Regulation and does not believe that any exemptions should be granted. The City also recommends that the Province include requirements for stewardship organizations to improve accessibility to recycling options for current and proposed items covered under the regulation, including increasing the number of depots where these materials are accepted.

**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 would favour bans on single-use items over their inclusion in the Recycling Regulation. Many single-use items are already covered under existing stewardship programs. While these are effective at recovering some items sold to consumers, there are still large quantities that are littered or landfilled. Furthermore, local governments often bear a significant financial burden above what is paid to them in program fees by stewardship organizations as these fees rarely come close to providing full cost recovery. The environmental risks posed by these materials are significantly reduced by cutting them off at the source through bans, and local governments are not tasked with managing the recovery of additional materials with already limited resources. Should the Province wish to pursue adding additional single-use items to the Recycling Regulation, then the City would recommend that local governments be given the authority to enact bans or other regulatory measures on these materials.

### **3. Expanding Plastic Bottle and Beverage Container Returns**

**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 is supportive of the inclusion of milk and milk substitutes in the beverage container deposit-refund schedule as it provides clarity to consumers and an incentive for the return of these items to recycling depots.

**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 is supportive of the Province's efforts to create simplicity and uniformity for consumers of beverage containers and would further recommend that the deposit-refund be increased in the near future.

**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 is supportive of this proposal as a mechanism to facilitate additional recovery of containers.

### **4. Reducing Plastics Overall**

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

The Province should push for standards and associated targets that result in increased investment in recycling programs and associated infrastructure. A weak target that is easily achievable does little to spur investment and innovation, whereas a high target will push stewardship organizations to expand collection options, and create opportunities for investment in recycling plants.

The City would also support standards and targets that utilize recyclable content generated within Canada and/or North America. In particular, fibre standards that encourage investment in local recycling options for material recovered in BC in order to avoid shipping to overseas markets.

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

The City encourages the Province to improve accessibility to recycling programs by ensuring that stewardship organizations increase the number of depots available to residents. Particularly if the Province wishes to add additional plastic packaging and packaging like items to the Recycling Regulation.

If you have any questions regarding the City of Chilliwack's feedback, please contact the undersigned at 604.793.2701 or [tfriesen@chilliwack.com](mailto:tfriesen@chilliwack.com).

Sincerely,



Tara Friesen, P.Eng.  
Manager of Environmental Services