

September 27, 2019

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

**Re: City of Surrey Response to the Clean BC Plastic Action Plan Policy Consultation Paper**

Dear Sir/Madam,

Thank you for the opportunity to provide feedback on the on the CleanBC Plastic Action Plan Policy Consultation Paper. The City of Surrey recognizes the growing importance of addressing plastics - in particular, single-use items and plastic packaging. The use of these items results in increased energy and resource consumption, scattered litter, illegal dumping, increased costs to collect from public spaces, and increased landfill waste. Additionally, these items are not all recyclable or compostable. Of even greater significance is that single-use items can end up in waterways, contaminating the water and adversely impacting marine life.

Given the significant environmental impacts of plastic packaging and single-use items, the City of Surrey is currently developing a single-use item reduction strategy. However, we recognize there are significant benefits and value with a provincial wide approach to reducing and/or eliminating plastic packaging and single-use items. A harmonized approach will provide consistency for the public, consumers, producers and businesses with operations throughout the Province. Accordingly, we strongly support the development of a provincial program.

We provide the following comments regarding the proposed new policy opportunities and amendments to the recycling regulation of the Environmental Management Act as outlined in your policy consultation paper.

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

Provincial bans will ensure an equitable, transparent, sustainable and consistent approach throughout the region. Independent strategies or restrictions are problematic for retailers and industries operating across many different locations. Different requirements also create confusion for the public.

In addition, while there has been progress towards reducing waste generated from some single-use items and plastic packaging through the Recycle-BC program, many of these items do not have viable recycling markets. A provincial ban is a beneficial and harmonized approach serving as a regulatory tool to eliminating or reducing plastic packaging at the production level rather than the consumer level.

Priority plastic packaging products recommended as a priority for BC should include (but not be limited to) plastic shopping bags (single use); plastic film products; rigid and foam cups, lids, and containers; food and beverage products; plastic straws; and single-use plastic utensils. Other items to include should be determined based on the amount landfilled and their impacts on the environment.

## **2. What types of bans should be considered?**

Implementing bans on the sale of single-use items (SUIs) and plastic packaging is a great step forward to significantly reduce the amount of these items and this could be implemented as the first immediate step while looking at other measures to eliminate these items. In addition, bans on the sale of SUIs will also start to change consumer behavior towards purchasing more sustainable products. Ultimately, reduced production of certain types of packaging is the preferred option, as this prevents the material from being created in the first place.

Disposal bans can be ineffective, impractical and difficult to enforce, whereas the fines associated with bans are often considered as the cost of doing business making them far less effective without an associated incentive. Disposal bans can also produce unintended consequences such as encouraging the export of waste to other jurisdictions and potentially increasing illegal dumping.

In addition, bans should be imposed on plastic packaging or SUIs that are considered compostable, biodegradable or recyclable. These types of items cannot be processed in current composting or recycling processes, considered contamination and end up being landfilled. A more refined review is required, and design standards implemented to ensure that they are designed to fit the capabilities of the existing infrastructure.

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

Exemption consideration needs to be made for health and safety reasons, disability needs, public health authority requirements.

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?**

All levels of government have a role in reducing or eliminating any plastic packaging, SUIs and any other harmful products for the environment.

The federal government should regulate and take action with certain plastics that have a larger negative environmental footprint greatly impacting energy and resource consumption, contaminating the waterways and adversely impacting marine life. The focus should be on reducing impacts to these environments from both Canadian and imported plastic packaging, through bans, product redesign, technology changes and recovery. Harmonization nationwide should be priority.

The province has its own Environmental Management Act where it has the authority to regulate plastic packaging and SUIs and expand EPR programs to include various other types of plastics. A provincial ban will ensure a consistent and coordinated approach with single-use item reduction among communities. This will significantly benefit residents, consumers, businesses, industry and other stakeholders with transitioning towards reducing or eliminating single-use items.

Local governments should be provided authority to introduce single-use item bans to allow them to address and take measures on items or areas that are not regulated by the province.

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 Ministry should include all recyclable plastic packaging and single-use items in the Recycling Regulation. This will ensure that producers take responsibility for the products they manufacture, which will in turn go a long way to reducing landfill waste and minimizing marine impacts. In addition, it will ensure better design and recyclability of their products, creating a more circular economy.

Considerations for improved regulation related to the ICI sector and the recycling of plastic containers and SUIs will be needed in order to further drive the incentives for actual recycling of these products as opposed to their disposal and/or becoming waste-to-energy options.

**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?**

As mentioned above, we support the Ministry's proposal to add SUIs to the recycling regulation. This will ensure an equitable, transparent, sustainable and consistent approach throughout the region. Independent strategies or restrictions are problematic for retailers and industries operating across many different locations with different requirements and creating confusion for the public.

Priority single-use items recommended as priority for BC should include but not be limited to, plastic shopping bags (single use); rigid and foam cups, lids, and take out containers; plastic straws; and single-use plastic utensils. Other items to include should be determined based on their environmental impacts and landfill contribution. In addition, any single-use items that continue to be produced should be regulated to contain an increasing set percentage of recycled materials to ensure that they can be recycled in current process facilities.

Consideration should be made for health and safety, disability needs, public health authority requirements, and in line with the availability of recyclability/composability alternatives, etc.;

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

We support this approach. Increasing the deposit refund rate will increase the return rate of deposit containers at recycling depots. In addition, expanding the types of beverage containers accepted and increasing the recycling target rate in the program will improve recovery, ensuring more material is diverted from landfill and recycled. All of these will result in increased waste diversion, and reduced litter in public spaces and marine environments.

**8. 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)?**

We support this approach. It provides opportunities to improve service and convenience as well as an option to support charitable organizations.

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

Introducing a national standard on recycled content and targets is by far the most important mechanism to ensure that plastics (and other items) get recycled. There are far too many items that cannot be recycled due to their design, which contaminates the recycling stream, increases landfill waste, grows the need for unnecessary virgin resources, and increases energy use and impacts to marine life. Standards will promote changes to the manufacturing of items that are less impactful to the environment from both a waste and climate change (greenhouse gas emissions) perspective.

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

Current Extended Producers Responsibility programs provide excellent options to divert waste from landfill. However, more continued efforts need to be made to increase and expand these types of programs to shift the responsibility from taxpayers to manufacturers, so that they take full life-cycle ownership of the material that they produce.

Expanded EPR programs will ensure that producers are responsible for safely recycling and disposing of their materials. The Recycling Regulation is an effective tool in promoting the production of products and packaging that limit pollution risk to the environment, contain higher levels of recyclable content and can be easily recycled, thus creating a more circular economy.

Thank you again for the opportunity to provide feedback on the CleanBC Plastic Action Plan Policy Consultation Paper. We hope these comments are helpful in finalizing your approach to minimizing impacts of plastic packaging and single-use items. If you have any questions, please do not hesitate to contact me via phone at 604-590-7208 or email at [hsjanda@surrey.ca](mailto:hsjanda@surrey.ca).

Sincerely,



Harry Janda  
Solid Waste Manager  
City of Surrey