



September 30, 2019

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

Submitted via email: Plastics@gov.bc.ca

RE: Plastics Action Plan - Policy Consultation Paper

Cleanfarms is an industry-led stewardship organization that develops recycling and waste management programs for Canada's agricultural sector. We have been a strong partner to British Columbia's farming community for 30 years.

British Columbia farmers have a consistent, tangible and solid track record of good environmental stewardship and this includes a commitment to good waste diversion practices.

Organizations like ours tap into this commitment on a daily basis. With the right support, we can fulfil our mandate to offer a wider variety of recycling programs to farmers and support the province's broader goals to advance the reduction, diversion and recyclability of plastics.

We understand that this consultation paper is just the start of many conversations aimed at improving plastics management in British Columbia. We look forward to being a part of these conversations and can help facilitate adequate consultation with the agricultural sector to create positive environmental outcomes.

Sincerely,

Kim Timmer
Manager, stakeholder relations

cc: Laurie Throness, MLA Chilliwack-Kent
Reg Ens, BC Agriculture Council
Elaine Stovin, BC Cattlemen's Association



Plastics Action Plan - Policy Consultation Paper *Comments provided by Cleanfarms – September 30, 2019*

About Cleanfarms

Cleanfarms is a federally incorporated not-for-profit, industry-funded, stewardship organization committed to environmental responsibility through the proper management of agricultural waste. Our membership is comprised of manufacturers, distributors, and retailers of pesticides, fertilizers, animal health medications, seed and grain bags.

We make it possible for farmers to safely dispose of or recycle agricultural packaging waste, primarily plastic, through programs financed and supported by our private sector members. We also deliver government-funded pilot programs.

Today, Cleanfarms has six programs, permanent and pilot, to recover ag-waste. Our collection program for agricultural pesticide and fertilizer containers celebrated its 30th anniversary this year. Additional programs to collect non-refillable bulk pesticide containers, unwanted pesticides and old livestock medications, seed, pesticide and fertilizer bags, grain bags, other ag plastics help keep farms and rural communities clean.

While there are over 170 stewardship organizations across Canada, Cleanfarms is the only organization that works in the agriculture sector. We have approximately 10 sister organizations around the world, in places like Germany, France, and New Zealand. Cleanfarms collaborates with its sister organizations to share best practices, develop end markets and ensure harmonization and efficiencies.

Introduction

Overall, we commend the Ministry of Environment and Climate Change Strategy for taking on this initiative and placing emphasis on action, collaboration and harmonization.

Based on conversations with ministry staff, we understand that the intention of this paper is to create a forum for discussion around plastics and that this is the start of many consultations. On that note, our comments are very high level and only focus on areas that, in our view, impact plastics management within agriculture.

Bans on single-use packaging

Product bans

We would recommend caution with respect to single-use plastic product/packaging product bans that impact the agricultural sector. Factors like biosecurity (integral to our food supply) may limit reuse of some plastic items that are used on-farm.

Disposal bans

Some of our international counterparts operate in regions where these exist. Our observations suggest that disposal bans may be effective tools to support waste reduction programs. However, caution is necessary and bans must be properly applied and only in situations where well-established and easily accessible stewardship programming is available.

Exemptions, bans at different levels of government, etc.

The paper requested feedback on exemptions and bans at various levels of government, including municipalities. Overall, we would recommend efforts that are broader to avoid patchwork like initiatives that can be confusing to the end user. Cleanfarms strongly recommends consultations with the farming community with respect to this topic. Our experience suggests that agriculture can be, unintentionally, negatively impacted by initiatives, whether regulatory or not, that don't take into account agriculture's unique needs and challenges.

More recycling options

Our research shows that when convenient and cost-effective stewardship programs are available, farmers will overwhelmingly use them. This supports the paper's suggestion to expand extended producer responsibility for single-use items.

Adding single-use items to Recycling Regulations

Overall, Cleanfarms supports expanding recycling programs where appropriate. For example, it is important that expansions avoid unintended overlap with successful voluntary initiatives like our programs which manage a number of single-use items used on farms like empty pesticide and fertilizer containers and seed and pesticide bags. Adequate consultation can ensure that this does not occur.

Based on conversations with government officials, we understand that there is presently no intention to expand recycling programs to include single use items like bale/silage wrap. It should be noted that the farming community has expressed interest in recycling programs, in part, because it helps them meet a number of their ongoing sustainability objectives. Cleanfarms is prepared to dedicate resources to agricultural plastics program development in British Columbia when the province is ready to move this forward and other conditions, most notably harmonization, are appropriate.

Harmonization is critical to ensuring competitiveness for farmers. When it comes to producer responsibility programs, activities and regulations, or lack thereof, from neighbouring provinces can significantly impact a program's success. This is particularly important for British Columbia due to the smaller size of British Columbia's agricultural sector compared to other provinces. Cleanfarms generally recommends broader, more regional approaches to managing ag plastics because it ensures a more level playing field for producers and farmers and encourages efficiencies. It also encourages local end markets, entrepreneurship and job creation.

Adding packaging-like products

The paper makes reference to 'including packaging-like products into Regulations.' There are a number of packaging-like products that are used on farm like silage film, bale wrap and netting that would fall into this category. Once again, we would recommend further consultation with the agricultural community before action is taken on these items. Agriculture can be, unintentionally, impacted by regulations given that the agriculture sector is a very niche sector. Consultation with Cleanfarms and the entire agricultural value chain can help avoid this.

Reducing plastics overall

National recycled content standards

Promoting recycled content in new packaging and products is an important initiative and we are encouraged by its inclusion in this paper. Increased recycled content and design for recycling are themes that Cleanfarms is promoting within its membership and with its international partners.

Other suggestions

Improving plastics management is a long-term, multi-phased, multi-jurisdiction process.

Cleanfarms strongly supports a view of plastic as a resource, and we believe that every effort should be made to ensure that valuable, recyclable materials do not end up in landfills or being illegally burned. We need help promoting this message.

As longer term plans to better manage plastic unfold, we feel that an actionable short term project could involve the implementation of education and awareness campaigns, developed in collaboration with relevant stakeholders, about the value of waste as a resource, the benefits of stewardship or extended producer responsibility programs (including non-regulated programs), and how users can access existing programs.

Cleanfarms has over 30 years of experience in the collection, management, and processing of agricultural waste, and two key learnings from this experience are that effective education and awareness

strategies are critical to a program's success, and that collaboration between stewardship organizations and government can significantly improve performance.

Another meaningful short term project would be an investment, through government-funding, in pilot projects, stakeholder engagement and other data gather exercises (e.g. ag waste characterization studies and farmer research). Cleanfarms has applied for project funding at the federal level to do this type of work in the agricultural community. We will keep the Ministry of Environment and Climate Change Strategy and the Ministry of Agriculture informed of our progress.

In closing

Reducing plastic in the environment and landfills goes hand and hand with sustainability initiatives already underway in agriculture. We look forward to seeing how the Ministry of Environment and Climate Change Strategy will support these initiatives.