



Consultation on Clean BC Plastics Action Plan

September 30, 2019





1.0 Who we are

Consumer Health Products Canada (CHP Canada) is the industry association that represents the companies that make evidence-based over-the-counter medicines and natural health products.

These are the products you can find in medicine cabinets in every Canadian home. From sunscreens and vitamins to pain relievers and allergy medications, people use self-care products to maintain their health and manage their minor ailments. This is a fundamental part of self-care which is vital to the health of Canadians and the sustainability of our healthcare system.

CHP Canada has been the leading advocate for the self-care products industry for close to 120 years. We have been involved in shaping virtually every piece of legislation, regulation or policy that affects the self-care products that Canadians rely on to manage their personal health. We are committed to working with our members, government, and the broader health care sector to enhance the contribution that self-care with self-care products makes to the health of Canadians and the sustainability of our healthcare system. Our Active Members outlined in the image below are global multi-national manufacturers and marketers of over-the-counter medicines and natural health products.



Together, our industry generates \$5.6 billion in sales annually, produces \$1.5 billion in exports and sustains over 56,000 jobs.

The consumer health product industry in Canada





2.0 Purpose of this submission

The purpose of this submission is to provide feedback on the path forward to reduce plastic pollution in British Columbia.

No portion of this submission is considered confidential. This submission will be made available on our website: <https://www.chpcanada.ca/advocacy/briefs-submissions/>.

3.0 Responses to Consultation

British Columbia is planning to ban single-use plastics. CHP Canada supports the Government of British Columbia's desire to reduce the unnecessary use of plastics in consumer products. However, plastic materials used in the packaging or measuring devices for over-the-counter (OTC) medicines and natural health products (NHP), are important in meeting regulatory standards for safety and stability. **CHP Canada believes that these should not be considered in the same category as items such as disposable plastic water bottles, straws and coffee cups.**

For reasons of public health, it is vital that OTC and NHP products are packaged in a way that prevents contamination, maintains product quality and supports patient safety. Strict regulatory requirements are therefore in place to safeguard the integrity of OTC and NHP products throughout manufacture, distribution and shelf life.

Why plastic?

Product Sampling: Plastic's light weight, strength, and ability to be molded into any form makes it an ideal packaging material for product sampling. Rigid plastic keeps fragile items secure and flexible plastic makes easy-to-carry bags. Hence, product sampling is typically a single-use packaging application.

Many plastic films (often laminated) are utilized in the manufacture of sample pouch-stocks. Since plastics usually provide strong barriers to keep food and consumers safe, there are challenges for providing plastic-free alternatives while maintaining basic but crucial packaging properties.

For OTC and NHP products, the use of plastic materials in packaging and measuring devices is designed to ensure a product is delivered to the end user which meets the necessary safety and quality standards. All packaging for these products must comply with relevant regulatory requirements

The use of plastic packaging:

- ensures the product specification is maintained throughout its shelf life
- can maintain sterility and prevent potential contamination or degradation
- prevents tampering and can protect children from accidental exposure
- can support compliance and unit pack dispensing



- can offer additional safeguards to prevent or identify counterfeit products

What constitutes Single-use plastic?

Although British Columbia has yet not defined what Single use plastics are, they are defined by the European Commission as plastic items which are usually thrown away after one brief use, they are rarely recycled and are prone to end up as litter in the natural environment.

The actual definition is as follows:

'Single-use plastic product' means a product that is made wholly or partly from plastic and that is not conceived, designed or placed on the market to accomplish, within its life span, multiple trips or rotations by being returned to the producer for refill or reused for the same purpose for which it was conceived.

The re-use or re-filling of a consumer health product container is not permitted by the regulations governing the quality and stability of these products. Containers can be recycled, but the resulting recycled material will also not generally be compliant with the standards for medicines.

It is important that people retain the packaging of these products, as the directions for safe and effective use are printed on the packaging. Therefore, CHP Canada would argue that consumer healthcare product packaging, such as blister packs, re-openable bottles and dose measuring devices, such as medicine spoons, do not fall into the category of single-use plastics as they are used multiple times by the end user before being disposed of. **Hence, these single-use plastics should not be considered in the same category as other disposable consumable plastic products.**

Lastly, what are the Alternatives?

All materials used in the packaging of OTC and NHP products need to fulfill strict regulatory, quality and safety criteria and be fit for purpose.

The OTC and NHP industry is supportive of looking for alternatives to plastic use where appropriate. Glass is often not a suitable alternative. It is not a suitable material for certain types of dosage forms and is not always inert or compatible with medicinal products. Glass is more expensive than plastic, its manufacture uses significantly more energy than plastic production and it weighs more, which would increase energy costs and impact on the environment during transportation. One additional concern for glass is the potential for glass to fracture, thus presenting a further issue with respect to consumer safety.

Considerations for alternative packaging materials include:

- Can the material fulfil all the regulatory requirements?
- Will product shelf life be reduced?
- Will the change increase the cost of products?
- Will people be able to dispose of used packaging easily and safely?
- Will the packaging interact with or affect the product?
- Will the packaging adequately protect the product from light, moisture and contamination?



- Is the material robust and portable?
- Does the material offer protection against tampering and provide child-proof opening?
- How does the alternative material impact the environment?

There are currently a number of technical barriers to increasing the use of recycled plastics in packaging for OTC and NHP products. One such barrier is the cost of stability studies which would be required in case on any change in the immediate container. Stability studies are mandated by regulatory agencies across the globe (including Health Canada) as they determine the shelf-life and provide evidence that the quality of a drug product (and its packaging), over time and under the influence of various environmental conditions, remains acceptable for the duration of its stipulated shelf-life.

Hence, due to reasons mentioned above, currently, we believe there are no real alternatives as good as plastic for OTC and NHP products.