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File No.5380-01

The Honourable George Heyman
Minister of Environment and Climate Change Strategy
Room 112 Parliament Buildings
VICTORIA BC V8V 1X4

Dear Minister Heyman:

Re: Plastics Action Plan – Support and Feedback

Cowichan Valley Regional District (CVRD) is writing to support the proposed actions of the Ministry of Environment and Climate Change (MOE) to reduce plastic pollution and use less plastic overall by:

- Banning single-use packaging
- Dramatically reducing single-use plastics in landfills and waterways
- Implementing plastic bottle and beverage container returns
- Reducing plastic waste overall

CVRD also welcomes the federal government initiatives for plastics management including Zero Plastic Waste strategy and action. As part of 2018 G7 presidency, Canada has also launched an Ocean Plastics Charter covering five areas:

- Sustainable plastic design, production and markets
- Waste collection, management and infrastructure
- Sustainable lifestyles and education
- Research and innovation
- Coastal and shoreline restoration

Federal, provincial and local governments have been working together to create the Canadian Council of Ministers of the Environment (CCME) Zero Plastic Waste Strategy. The strategy lays out the areas for action that are important to Canada and are consistent with areas presented in the Ocean Plastic Charter. Circular and low carbon economy are the two principles emphasized for taking action to eliminate plastic waste.

BC is considered a leader in creating industry led Extended Producer Responsibility (EPR) recycling programs. Currently, there are 22 successful EPR programs covering 14 different product categories. EPR programs help British Columbians divert more than 315,000 tonnes of plastics from landfills, illegal dumping in parks and waterways as well reducing the overall carbon footprint by reusing or re-purposing these plastics. One of the major EPRs, Recycle BC (previously known as MMBC), through its Packaging and Printed Paper program (PPP), has recently included soft plastics, including laminated/zippered pouches and crinkly plastics, etc. The Province is also reviewing new ways to make plastic recycling easier, including a proposed system of electronic refunds for empty bottle returns. This would eliminate the need to sort bottles and provide the option to have refunds processed electronically or donated to community organizations.

At local level, the CVRD Board has recently approved its 4th Amendment of the Solid Waste Management Plan (SWMP) pending final approval by MOE. CVRD is considered among the best for per capita waste generation - 358 kg/capita when the BC average is 506 kg/capita (2017) with future goals


of maximizing diversion and zero waste. CVRD residents consider waste management a top priority and take great pride in keeping the parks, public spaces and waterways clean and free of plastics. Despite all efforts, currently there is more than 17% plastic waste in CVRD waste heading to the landfills. The CVRD, in its SWMP, proposes strategies to reduce and reuse/recycle plastics, including banning the single use plastics. The strategies range from supporting local municipalities' waste management programs, education, bylaws and investing in waste to energy projects.

In support of the province's Plastics Action Plan, the CVRD proposes the following:

- Through federal and provincial programs, promote circular economy by supporting local and Canadian manufacturing and repurposing for durable and long lasting plastic products (as opposed to products that are used once or twice before ending up in a landfill)
- Promote opportunities for additional EPR programs for prevention, value recovery and collection and clean up (cradle to cradle – lifecycle of plastics) for all remaining plastic materials currently not included in the EPR programs. All plastics should be recyclable or otherwise banned completely (excluding life saving medical equipment)
- Amend/update *Environmental Management Act* (EMA)
- Support and delegate powers to the local governments to reduce and ban single use plastics through *EMA*, *Community Charter* and *Local Government Act*
- Province-wide banning of plastic items including cotton bud sticks, cutlery, plates, straws, stir sticks, sticks for balloons, polystyrene containers, oxo-degradable plastics (i.e., single use plastic bags) and plastic water bottles (PETE 1) where possible
- Discouraging plastic bottle and beverage container use by providing these products in glass bottles with a deposit-refund system or charge a \$0.05 or greater refundable deposit for milk, milk substitute or other beverage containers
- Investing in research and assistance in the Ministry permitting process for alternate sustainable materials, innovative techniques for value recovery (waste to energy without incineration), e.g. plastics to diesel, alternate materials for packaging meals, vegetable wrapping and dietary supplement containers
- Through Recycle BC, ensure plastics recycling programs are user-friendly, efficient and inclusive of all sectors (the current program is confusing for the public)
- Investing in education and training at kindergarten through grade 12 school levels for plastic effects on the environment
- Facilitate and promote plastic recycling at no extra cost to the tax payer for sectors other than residential, including institutional, commercial and industrial sectors

Thank you for the opportunity to provide our feedback.

Sincerely,



Ian Morrison
Chair

IM/TW/pl