



**DART CONTAINER CORPORATION**

MASON, MICHIGAN 48854 • TELEPHONE (517) 676-3803

September 30, 2019

The Honourable George Heyman  
Minister of Environment and Climate Change  
Room 112, Parliament Buildings  
PO Box 9047 Stn Prov Govt  
Victoria, B.C. V8W 9E2  
[ENV.minister@gov.bc.ca](mailto:ENV.minister@gov.bc.ca)

**RE: Response to the Ministry of Environment and Climate Change – Plastics Action Plan Policy Consultation**

Dear Minister Heyman:

Dart commends the Government of British Columbia for its leadership in proposing actions to reduce littered plastic and the problems that arise from this careless human behavior. We appreciate the government working with producers to develop solutions and are pleased to provide feedback on the Plastics Action Plan consultation paper.

On behalf of Dart, I am submitting the following comments and recommendations for consideration. Our comments will be primarily focused on the proposal of banning single use plastics with specific discussion on polystyrene foam. But first, I would like to introduce you to Dart.

**Who is Dart Canada?**

Dart Canada is a leading supplier of foodservice packaging in Canada. Dart's product portfolio consists of paper, a variety of plastics and compostable foodservice containers. Dart has operated in Canada since 1985 and in 2012 we purchased Solo Cup. Today we have 415 employees in our Toronto facility. At Dart we understand that everyday decisions have an impact on the environment and our communities. We are committed to exercising effective environmental stewardship in pursuit of a sustainable future. Our multi-faceted environmental strategy includes an ongoing focus to:

- Optimize material use and production processes
- Define the environmental attributes of each of Dart's products
- Research and develop new materials, products, and technologies that reduce our energy usage and carbon footprint
- Promote recycling through the use of recycled content
- Utilize renewable resources

Dart is a member of the following associations that are actively building networks and working towards a circular economy:

- [Foodservice Packaging Institute – Foam Recycling Coalition](#)
- [Circular Economy Leadership Coalition – Canada Plastics Pact Working Group](#)
- [Canadian Plastics Industry Association](#)
- [The Recycling Partnership](#)
- [Association for Plastic Recyclers](#)
- [Trash Free Seas Alliance](#)
- [Keep America Beautiful](#)

As producers of foodservice containers of all materials we have a deep understanding of our products' environmental attributes, why specific products are preferred for specific applications and the recyclability of each material.

**One recommendation is that the Government of British Columbia establish a standard list of materials that must be collected through blue boxes across British Columbia to make recycling easier rather than implementing a single-use item ban in an attempt to achieve the goal of reducing greenhouse gas (GHG) emissions and waste going to landfill.**

Public discourse, particularly around banning single-use items, is filled with misconceptions about polystyrene. Left unchecked, these false premises will have unintended consequences and a negative impact on the very serious global environmental issues that the Province is seeking to mitigate, namely: GHG emissions and the overall waste stream.

**Polystyrene is not a large contributor to the waste stream.**

Polystyrene makes up less than 1% of the waste stream. Banning polystyrene would have little benefit to lowering overall household waste. For more information, see [Expanded Polystyrene Foam Recycling \(EPS\) Facts and Figures](#).

**Banning polystyrene will not reduce waste in the landfill.**

Banning polystyrene foodservice containers simply shifts the make-up of the waste stream to other products, like plastic-lined paper cups that are challenging to recycle and cannot be composted, because they contain a mixture of diverse materials that is costly to separate or breakdown.

The City of San Francisco conducted a litter audit (*see attached*) before and after banning polystyrene and found that the amount of litter was the same, the makeup of litter had simply shifted to other products. Litter and waste reduction are not product problems, they are human behaviour problems.

When examining legislative bans on specific products, it is critical to look at the unintended consequences that these bans will cause:

**Banning polystyrene foam foodservice packaging does not advance the Zero Waste Strategy. It means more waste going to landfill.**

Foodservice polystyrene makes up approximately 10% of the overall polystyrene market. If polystyrene food containers are banned, and producer-lead recycling and end-market development decreased or stopped, 90% of the polystyrene market, which is largely packaging foam shipped from all over the world, will no longer have potential to be recycled and will end up in landfill.

Also, restaurants still need to serve their customers and provide them with some form of packaging. A ban will force small businesses in the quick service and restaurant sectors to switch to paper cups and take-out containers as anticipated by the City of Vancouver.

***Did you know? Paper food packaging (soiled or clean) cannot be easily recycled. This is because the paper has a barrier to repel oil, grease and moisture. This protective barrier is essential to prevent the container from getting soaked and disintegrating in transit from restaurant to home, but it makes the paper food packaging challenging to recycle.***

**Banning polystyrene in British Columbia will not help prevent plastics from entering the ocean.**

A 2017 study from Germany’s Helmholtz for Environmental Research concluded that up to 95% of the world’s ocean plastic was coming from 10 rivers: Eight from Asia and two in Africa

Therefore, we recommend including polystyrene in a standard list of materials for blue bin collection. Having a standard list of blue box materials has additional benefits, including:

- Reducing contamination
- Improving sorting
- Supporting end-markets and enhancing the efficiency of processing recyclable materials
- Supporting processors by helping them anticipate waste flows and plan for investments
- Making a more valuable waste stream and attracting recyclers which can foster economic opportunities and job creation

**Polystyrene is not “rare or difficult to recycle.”**

Polystyrene is 100% recyclable; and in fact, even “dirty” or contaminated containers and products are easily cleaned with the conventional sorting and recycling technology that exist. In addition, there is a sustainable, profitable and growing end-market for these recycled products. The innovative companies collecting and recycling polystyrene is covered in the next section.

**A Ban on Polystyrene Foam Foodservice Packaging Could Stifle Recycling Research and Innovation.**

There has been a technology revolution in plastics recycling called molecular or chemical recycling. It is a next generation technology that means that plastics can be recycled to new polymers that can be made into new plastic material.

Molecular recycling technology breaks down the polystyrene polymers into their original virgin molecules or monomer state. Once de-polymerized, the new monomer and can be reused to make new products like waxes, styrene for new food packaging, or even sanitary medical applications in hospitals and doctors’ offices.

The City of Vancouver is already using this green technology to build green roads with the use of an additive. The addition of the recycled plastic additive to the asphalt helps make the roads stronger and significantly reduces the energy required to make the asphalt. This molecular or chemical recycling technology is available coast to coast – Green Mantra, Revitale Polymers, Pyrowave, BBL Energy, INEOS Styrolution, Sustane Solutions. Also British Columbia has access to a major polystyrene recycler and end market user locally, Regenyx, backed by world-famous environmentalist Richard Branson.

## **Not Undermining Extended Producer Responsibility (EPR) and the Circular Economy.**

One of the main objectives, as we understand it, of EPR is to force packaging design modifications for recyclability and build end markets for recycled resins; to create an endless loop of recovery and reuse in a circular economy.

## **Polystyrene foam can now be recycled to infinity using the breakthrough molecular/chemical recycling technology.**

Millions have been spent on the development of this molecular technology breakthrough. It would be a shame to ignore this innovation.

## **Collection.**

If we cannot collect it, we cannot recycle it. The plastics industry has also developed a new collection technology that will ensure that all polystyrene (dirty or clean) is collected and recycled. It is called an Energy Recycling Bag and it can be used at curbside as a complement to the blue box to collect all polystyrene foodservice packaging and any other plastic packaging not included in the blue box.

## **Consumers in British Columbia Prefer Recycling to Bans.**

In 2018, Pollara Strategic Insights in Vancouver [conducted a random survey of the opinions of Vancouverites](#) toward the proposed ban on foam polystyrene food packaging. The results showed that once residents found out that the foam was recyclable using a breakthrough technology support for a ban dropped from 69% to 26%. Support for a ban on polystyrene is not popular once the facts are known.

## **Policy Options for Consideration on Polystyrene Foam.**

- 1. Create a standard list of items for mandatory recycling through the blue box program** This will make recycling easier and is more effective in reducing GHGs and waste going to landfill than a product ban.
- 2. Encourage the adoption of molecular/chemical recycling across the province.**  
Allow the stewards to do the job they have been mandated to do under EPR and adopt molecular/chemical recycling to recycle polystyrene to infinity with Regenxy and AmSty. Failure to do this will stifle the molecular recycling breakthrough and undermine one of the purposes of EPR.
- 3. Energy Recycling Bag at curbside.**  
The Hefty Energy Bag provides a non-landfill end-of-life option to a community in cases where they have material that is not collected in the blue bin. By using the Hefty Energy Bag the material will be converted to energy and used throughout the community.

## **In Closing.**

Bans on highly recyclable plastic materials like polystyrene foam does not help reduce GHGs as alternative products tend to bring high GHG emissions in both their manufacture and transport thus undermining provincial efforts to become carbon neutral. To meet your carbon reduction goals and promote recycling innovation, we strongly encourage you to recycle, not ban, polystyrene foam foodservice containers and to support molecular/chemical and traditional recycling.

Thank you.  
Sincerely



AnnMarie Treglia  
Global Manager, Government Affairs & the Environment

Cc: David P. Morel, Assistant Deputy Minister  
Environmental Protection Division  
Ministry of Environment and Climate Change Strategy  
[David.Morel@gov.bc.ca](mailto:David.Morel@gov.bc.ca)

MLA Sheila Malcolmson  
Special Advisor for Marine Debris, Environment and Climate Change  
[Sheila.Malcolmson.MLA@leg.bc.ca](mailto:Sheila.Malcolmson.MLA@leg.bc.ca)

The Honourable Scott Fraser  
Minister of Indigenous Relations and Reconciliation  
[Scott.Fraser.MLA@leg.bc.ca](mailto:Scott.Fraser.MLA@leg.bc.ca)