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September 27, 2019

CleanBC – Plastics Action
c/o Robert Wood, Project Director

VIA EMAIL: PLASTICS@GOV.BC.CA

To Whom it May Concern:

Re: FORMAL SUBMISSION FROM THE DISTRICT OF SAANICH ON THE BC GOVERNMENT'S PLASTICS ACTION PLAN: POLICY CONSULTATION PAPER

This letter is a formal submission from the District of Saanich to the BC Ministry of Environment and Climate Change Strategy in response to the Plastics Action Plan: Policy Consultation Paper to confirm that Saanich Council, resulting from the following motions endorsed at the Council meeting on September 9, 2019.

That Council:

1. *“Endorse the letter as a formal submission from the District of Saanich to the BC Ministry of Environment and Climate Change Strategy in response to the Plastics Action Plan: Policy Consultation Paper”;* and
2. *“Direct staff to submit the letter to the Province by the September 30, 2019 deadline.”*

The District of Saanich is pleased to provide this formal submission in response to the Ministry of Environment and Climate Change Strategy's recent *Plastics Action Plan: Policy Consultation Paper*. Local governments are on the front lines of solid waste management and recycling operations, and as such stand to be impacted significantly by the proposed regulatory changes. Accordingly, we hope this input will meaningfully inform the Province's policy development in the months to come. We welcome further opportunities to provide input on the regulatory framework for recycling and use of plastics as it evolves. Our input below is provided under headings that correspond with the categories of actions presented in the consultation paper.

Bans on Single-Use Packaging

The District strongly urges the Province to move forward with provincial bans for plastic packaging under the *Environmental Management Act*. Specifically, bans for items such as plastic bags and polystyrene foam are supportable and viable in the short-term and should be implemented as soon as possible. This is due to the many precedents for similar bans that exist at the provincial/state and municipal level, the limited recycling options for these materials, their well-documented negative environmental impacts, and the demonstrated ability of consumers and businesses to respond quickly due to widespread availability of alternative materials. The District also supports quick action to phase-out single-use plastics similar to the forthcoming European Union regulation, to include items such as straws, cutlery, plates and other food and beverage containers, soft plastic packaging and single-use hard plastic containers. All bans on the production and use of plastic products should be sensitive to exceptions that may be warranted for health and safety reasons.

Provincial bans on the production and use of the aforementioned materials would be significantly more effective and efficient than the patchwork of approaches that would emerge if local governments have to develop their own regulatory bans. A consistent province-wide approach would improve certainty for residents, for businesses, and for manufacturers. It is also likely to spur significant innovation in the development of materials with lower environmental impacts, which may not materialize from individual local government bans due to limited market sizes. Most importantly, province-wide bans are likely to be the most effective in terms of reducing the generation of plastics and reducing pressure on landfills.

If the Province does not proceed quickly toward provincial bans, it is critical that the current uncertainty surrounding local government authority and jurisdiction with respect to bans on the use of materials such as plastic bags be rectified as soon as possible, so that local governments can advance their constituents' interests in more ambitious environmental stewardship in the absence of provincial leadership.

More Recycling Options

The District is also supportive of expanding the range of materials that can be recycled to increase diversion from landfills, whether through an extension of the existing Extended Producer Responsibility Program or other avenues. This is an important strategy to reduce the impacts of consumption and increase diversion from landfills, thereby extending the life cycle of landfills commonly operated by local governments.

Reducing Plastics Overall

The District supports the Province developing recycled content performance standards in conjunction with the federal government in order to reduce the generation of new plastics. This approach also importantly will create more demand for recycled products, which could help stabilize the existing global recycling market that suffers from volatility

and creates ongoing uncertainty for existing recycling programs and those who invest time and energy in responsible participation in those programs.

Expanding Plastic Bottle and Beverage Container Returns

The District supports the expansion of the current deposit-refund system to all types of single-use beverage containers as proposed in the consultation paper, and urges the Province to increase the refundable deposit amount to a minimum of 10 cents. Experiences in other jurisdictions demonstrate that higher deposit amounts can significantly increase return rates, in some cases close to 100%.

In closing, we appreciate this opportunity to inform this very important process. We are pleased to see the Province stepping up into a leadership role in response to growing public concern about the ubiquitous nature and harmful effects of plastics in our environment, and we urge the Province to act quickly in this regard.

An excerpt of the minutes from the September 9 Council Meeting is attached for information.

Yours truly,

A handwritten signature in black ink, appearing to read "F. Haynes", with a horizontal line underneath.

Fred Haynes
Mayor

cc: Saanich Council

2560-50
Plastic Bags

FORMAL SUBMISSION TO THE BC GOVERNMENT'S PLASTICS ACTION PLAN

Report of Councillors Mersereau and Taylor dated August 29, 2019 recommending that Council endorse the attached letter as a formal submission from the District of Saanich to the BC Ministry of Environment and Climate Change Strategy in response to the Plastics Action Plan: Policy Consultation Paper, and direct staff to submit it to the Province by the September 18, 2019 deadline.

**MOVED by Councillor Chambers and Seconded by Councillor Mersereau:
"That Council:**

- 1. Endorse the letter as a formal submission from the District of Saanich to the BC Ministry of Environment and Climate Change Strategy in response to the Plastics Action Plan: Policy Consultation Paper; and**
- 2. Direct staff to submit the letter to the Province by the September 18, 2019 deadline."**

**MOVED by Councillor Mersereau and Seconded by Councillor Chambers:
"That the motion be amended to revise the date to submit the letter to the Province by the September 30, 2019 deadline."**

Council discussion ensued with the following comments:

- This is an opportunity to upload regulatory changes to the Provincial Government.
- Eliminating single use plastics would have a greater impact if it is done Province-wide.
- There may be a role for the Federal Government as well in terms of making regulatory changes to reduce plastic packaging.

The Amendment was then Put and CARRIED

The Motion, as Amended, was then Put and CARRIED

Motion, as Amended:

"That Council:

- 3. Endorse the letter as a formal submission from the District of Saanich to the BC Ministry of Environment and Climate Change Strategy in response to the Plastics Action Plan: Policy Consultation Paper; and**
- 4. Direct staff to submit the letter to the Province by the September 30, 2019 deadline."**