

September 30, 2019

File #: 5360-01

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

Dear Minister Heyman,

RE: District of Summerland Response to new policy opportunities and proposed amendments to the Recycling Regulation of the *Environmental Management Act*

The District of Summerland has reviewed the Clean BC Plastics Action Plan Policy Consultation Paper. As a local government that directly operates its own landfill and oversees the curbside collection program we feel it is important to provide a response to the Ministry of Environment and Climate Change Strategy's (the Ministry) call for submissions regarding proposed amendments to the Recycling Regulation of the *Environmental Management Act* to address plastic waste.

After review of the "Plastics Action Plan Policy Consultation Paper" (Consultation Paper), consultation with other local governments and discussion with Council, the District of Summerland feels it is important to provide feedback regarding the outcomes and impacts of the Recycling Regulation to our community, solid waste programs and landfill. Further, although community members have been invited to complete the survey, the short engagement period has not allowed time for a more thorough community consultation and as such, the District's response will focus on strategic and high-level operational matters, rather than recommendations on individual packaging items.

In particular, the District of Summerland is requesting that the following be included in the proposed amendments to the Recycling Regulation:

1. The public sector (Local Governments in particular) should not bear the majority of the financial and administrative burden for waste reduction and recycling programs.
2. Ease of customer use and education are paramount, including a comprehensive provincial and federal roll-out education plan and easy-to-follow labeling that is uniform across jurisdictions.
3. Regulations should maximize waste reduction at the source and then reuse, before recycling or composting (e.g., minimization or removal of product packaging).
4. Regulations should work towards banning non-recyclable/compostable products first.

5. Bans or other disincentives should consider viable replacements and the potential consequences of those policies (e.g., plastic bags being replaced with compostable bags that are not suitable for processing at typical landfill composting facilities will lead to them to being sent to landfill and decomposing, thereby creating increased greenhouse gas emissions or to be contaminants in the composting feed stock, causing operational issues).
6. Government ministries should work collaboratively on solutions for packaging reduction (e.g., support from health authorities for customers bringing their own containers).
7. Local Governments should be able to implement complementary regulations to the provincial and federal regulations.

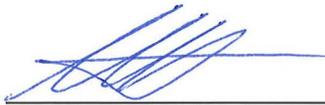
The District of Summerland appreciates the opportunity to provide feedback on such an important matter as addressing plastic waste. We encourage further local government and community consultation as the Ministry moves forward through the regulatory amendment process.

Thank you for your time and consideration, and we look forward to continued discussions on regulation amendments and implications regarding the reduction of plastic waste.

Sincerely,



Toni Boot
Mayor



Anthony Haddad
Chief Administrative Officer