



**Electronics Product
Stewardship Canada**

www.epsc.ca

**Recyclage des produits
électroniques Canada**

www.rpec.ca

August 28, 2019

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

Submitted via email: plastics@gov.bc.ca

RE: CleanBC Plastics Action Plan Consultation

Thank you for the opportunity to comment on the Plastics Action Plan Policy Consultation, as posted on the Environment and Climate Strategy website on July 25, 2019.

Electronics Product Stewardship Canada (EPSC) is a not-for-profit, industry-led organization with a membership comprising original electronics manufacturers.

Our main suggestion for the government of British Columbia, as a major purchaser of electronics, is to use the powerful tool of public procurement to stimulate the market for recycled content in electronics products. Today, recycled plastics represent approximately 12 percent of total global plastics production. It is important to provide markets by incorporating recycled plastics into products – especially considering the significantly lower GHG footprint of recycled plastics when compared to virgin plastics.

EPEAT is the leading ecolabel for the IT sector, used by public and private sector purchasers globally. EPEAT-registered products meet strict sustainability criteria that address impacts across the full lifecycle of a product. They are supported by IEEE Standards verified by third parties. There are about 2,000 EPEAT certified electronic products available in Canada this year. The government of Canada includes EPEAT requirements in their purchasing specifications, which over their lifetime will result in the reduction of 13,710 tonnes of materials and 32,710 tonnes of CO2 equivalents. <https://greenelectronicscouncil.org/epeat/epeat-overview/>

We encourage the government of British Columbia to ensure that their purchasing power is used to stimulate markets for recycled plastic content.

Every year EPSC members make new strides in reducing materials in their products and incorporating recycled content, where functionality allows. Please see our Design for Environment reports for more detail: <http://epsc.ca/design-for-the-environment-report/>

EPSC greatly appreciates the opportunity to comment on the proposed action plan. We look forward to continued engagement and collaboration with the Ministry of Environment and Climate Change Strategy.

Please contact us if you would like more information.

Best regards,

A handwritten signature in blue ink, appearing to read "S Kerr". The signature is fluid and cursive, with the first letter 'S' being large and prominent.

Shelagh Kerr
President and CEO