

## Federated Co-operatives Limited

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**VIA EMAIL:** [plastics.@gov.bc.ca](mailto:plastics.@gov.bc.ca)

### **Re: Clean B.C. Plastics Action Plan**

Federated Co-operatives Limited (“FCL”) would like to thank the Ministry of Environment and Climate Change for providing stakeholders with the opportunity to comment on the Clean B.C. Plastics Action Plan.

FCL, based in Saskatoon, is Saskatchewan’s largest company and the 56th largest company in Canada, with \$10.7 billion in sales in 2018. As a co-operative, FCL is owned by approximately 170 autonomous member retail co-operatives across Western Canada. Together, FCL and these local retail co-operatives form the CRS. The CRS serves members and communities with products and services to help build, feed and fuel individuals through 1,500 retail locations in 580 communities (78 in B.C.). FCL and its wholly owned subsidiary, Co-operative Refinery Complex (“CCR”) supplied 6.1 billion litres of gasoline, diesel and other products to fuel the needs of the CRS in Western Canada.

FCL recognizes the impact of single use plastics on the environment and the need to establish solutions that address the challenge of reducing waste produced by them. FCL recommends that policy guidelines and regulations should be:

- Equitable – no jurisdiction, sector or entity should be expected to bear an unreasonable burden or be competitively disadvantaged;
- Transparent – policy design and costs are clearly communicated, along with clearly defined objectives;
- Sustainable – policies are based on economic analysis, and supported by feasibility and impact assessments that take into account the balance of environmental, economic and social goals; and
- Achievable – policies must involve existing and contemplated technologies.

We thank the Ministry again for the opportunity to comment on the questions posed in the Consultation Document. You will find our responses in Appendix A (attached).

Should you have any questions, wish to discuss our position on Clean B.C.’s Plastic Action Plan, or desire to arrange a meeting, please contact Cynthia Hassett, Government Relations Manager at 306.244.3431 or by email at [Cynthia.Hassett@fcl.crs](mailto:Cynthia.Hassett@fcl.crs)

Appendix A: Consultation Document Questions and Responses:

**Key Area 1: Bans on Single-Use Packaging**

**Questions:**

**Do you think bans on plastic packaging should be implemented in B.C.? What plastic packaging products are a priority for B.C. to ban?**

FCL advocates harmonization of regulations at the highest practical level (i.e. national or provincial) and recommends that the Government of British Columbia work with the Federal Government and other provinces on a harmonized solution. We do not support the introduction of local (municipal) level bans. This increases the cost and complexity of systems and utilization thereof for consumers and businesses.

It should be recognized that plastic packaging plays an important role in food safety and quality and reducing food waste. It is also important to consider food security and affordability. Banning plastic packaging may produce unintended consequences and could result in increased environmental impact. Any proposed packaging bans should be science-based, and must result in improved environmental outcomes on a life-cycle basis that considers both the product and the packaging. Further, any bans should consider the availability of cost-effective alternatives, the necessary enhancements to recycling systems, and the time required for the full value chain to implement alternatives.

Rather than banning, focus should be on migration to plastic (or alternative) packaging with improved recyclability or circular economy characteristics and enhancing recycling and waste handling systems to drive a circular economy approach to packaging. A phased in approach to banning specific plastic packaging, depending upon whether there is an appropriate cost-effective non-plastic alternative available at the time the ban is considered, and whether feasible and effective systems are in place to collect and recycle the plastic packaging in question is recommended.

**Key Area 2: Dramatically Reduce Single-Use Plastic in Landfills and Waterways**

**Questions:**

**Do you have comments or suggestions regarding the ministry's proposal to include packaging-like products in the Recycling Regulation? Are there any packaging like products you believe should be exempt from the Recycling Regulation? Do you have comments or suggestions regarding the ministry's proposal to add single-use items to the Recycling Regulation? Are there any single use items you feel should be exempt from the Recycling Regulation?**

As noted above, FCL advocates for harmonization of regulations at the national level, and suggests BC work and align with guidelines/directions recommended by the Canadian Council of Ministers of the Environment (CCME).

The definition of "packaging-like products" noted in the discussion paper describes a variety of products, some of which are noted as reusable. Prior to proceeding with any revisions to the *Recycling Regulations*, a more robust definition of the categories and thorough understanding of the environmental impacts resulting from the use of these products should be developed.

**Key Area 3: Expanding Plastic Bottle and Beverage Container Returns – Expanding the deposit refund system to cover all beverage containers with a 10 cent refundable deposit**

**Question: Do you have comments or suggestions on the ministry’s proposal to include milk and milk substitutes in the beverage container deposit-refund schedule?**

FCL recognizes the impact of single use plastics on the environment and the need to establish solutions that address the challenge of reducing waste produced by them. We would support the inclusion of milk and milk substitutes in the beverage container deposit-refund schedule if the government ensures retailers are compensated for the return costs in a manner similar to deposits.

**Key Area 4: Reducing Plastics Overall**

**Question: What should B.C. consider in the development of a national standard on recycled content and any associated targets?**

As noted in the response under Key Area 1, FCL advocates for harmonization of regulations and suggests BC work to align with the directions recommended by the Canadian Council of Ministers of the Environment (CCME).

A national standard for recycled content and associated targets must include consideration of the global nature of the plastics value chain, commodity prices, and competitiveness of the Canadian marketplace. Many packaging materials are not manufactured in Canada today. Availability and cost of recycled content relative to virgin plastic may cause challenges in securing supply; targets for recycled content should be phased in gradually to ensure they are equitable and achievable.

Any national standard established for recycled content and associated targets should be:

- Equitable – no jurisdiction, sector or entity should be expected to bear an unreasonable burden or be competitively disadvantaged;
- Transparent – policy design and costs are clearly communicated, along with clearly defined objectives;
- Sustainable – policies are based on economic analysis, and supported by feasibility and impact assessments that take into account the balance of environmental, economic and social goals; and
- Achievable – policies must involve existing and contemplated technologies.