



FOODSERVICE PACKAGING
INSTITUTE®

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September 30, 2019

Ministry of the Environment and Climate Change Strategy –
Recycling Regulation Amendments
PO Box 9341 Stn Prov. Govt.
Victoria, BC
V8W9M1

Submitted by email: Plastics@gov.bc.ca

RE: Policy Consultation Paper Comments – BC Plastics Action Plan

Please accept the following comments regarding the British Columbia Plastics Action Plan: Policy Consultation Paper from the Foodservice Packaging Institute (FPI). Founded in 1933, FPI is the leading authority on foodservice packaging in North America. FPI supports the responsible use of all foodservice packaging, while advocating an open and fair marketplace for all materials. FPI collects, maintains and disseminates science-based information related to the industry and its products. Our members include raw material and machinery suppliers, manufacturers, distributors and purchasers of foodservice packaging. FPI represents approximately 90 percent of the entire industry.

FPI strongly opposes any government intervention in the marketplace, especially regulations that would limit the use of any foodservice packaging. We believe that each foodservice package must compete in the marketplace based on its own merits of product performance and suitability, price competitiveness and, of course, impact on the environment. Each product plays an essential part in the foodservice industry, and applying bans severely impacts the efficiency, cost and stability of a complex supply chain. FPI believes in reducing waste, recycling or composting foodservice packaging, and protecting public health through the use of sanitary, single-use items.

Please consider FPI's responses to the questions posed in the consultation paper:

Do you think bans on plastic packaging should be implemented in B.C.?

The Foodservice Packaging Institute does not support product bans and does not believe B.C. should be implementing plastic packaging bans. Plastic packaging is an essential component to the single-use economy, and B.C. should focus on the recovery and reuse of these items.

What plastic packaging products are a priority for B.C. to ban?

None.

What types of bans should be considered (examples include bans on sale of a certain type of packaging or ban on use of a certain type, or bans on disposal)?

None.

If a ban was applied, how should exemptions be considered?





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If B.C. were to implement a specific product ban, FPI would ask that businesses have ample time to use existing product stock and identify new feedstocks/options for products.

Bans can be implemented in some form by all levels of government due to the different regulatory powers in place. Are there bans best suited for implementation at the federal, provincial or local government level?

Traditionally, FPI supports local government's right to regulate the collection and disposal of products in their jurisdiction, given that recycling/composting/trash services are typically provided by local governments and can vary depending on the jurisdiction. However, since B.C. currently provides a robust recycling program through Recycle BC, allowing for the collection and recycling of many single-use products like plastic (both rigid and foam) cups and take-out containers, FPI would prefer a provincial-wide policy expanding recovery efforts, without banning specific products.

Should local governments be given the authority to ban problematic plastic items in their community?

No

What types of bans should be considered?

None.

Do you have comments or suggestions regarding the ministry's proposal to add single-use items to the Recycling Regulation?

FPI supports the collection of and recycling and/or composting of single-use foodservice items. FPI supports expanding B.C.'s recycling and composting operations.

What should BC consider in the development of a national standard on recycled content and any associated targets?

This is a decision best left to industry. While industry supports the increased use of recycled content and understands why it's important to help close the loop, it also understands the limitations, whether technical or financial. Industry can also better identify and avoid unintended consequences.

FPI looks forward to continuing to work with B.C. on these proposed regulations and want to continue to be a partner in the process.

Sincerely,

Brian Sernulka
Director, Government Relations

