

September 30, 2019

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

Dear Sir/Madam:

RE: Fraser Valley Regional District – Feedback for Clean BC Plastics Action Plan Consultation

The Fraser Valley Regional District (FVRD) strives for zero waste, effective and efficient solid waste management, a strong economy, and a healthy environment. The following feedback on the Province's Plastics Action Plan Policy Consultation Paper is in line with our Solid Waste Management Plan, our member municipalities' efforts to reduce waste disposal rates, and our collective efforts to protect our environment.

1. Bans on Single-Use Packaging

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

- Several of our member municipalities have provided examples of products they recommend to be prioritized, including single-use checkout bags, plastic straws, disposable hot and cold drink cups, plastic take-out containers, single-use utensils and foam cups and containers. Consultation with industry is required as is thorough research on potential alternative products that may emerge that could have harmful impacts as well.
- Another category that should also be considered is "Other Flexible Plastic Packaging." Currently this category of packaging is being collected across B.C. at Recycle BC recycling depots and then transformed into a refuse derived fuel source. The FVRD is concerned that efforts to divert these materials from landfills may result in decreased air quality concerns for the region's residents. Recycle BC has been unable to provide evidence to the FVRD and its member municipalities proving that stack emissions from its refuse derived fuel are cleaner than the fuel sources it is purported to displace.

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)?

- The FVRD is supportive of bans on the sale or distribution of certain types of packaging. These bans will prove the most effective in changing behaviours. Disposal bans will not have the desired effect and would download management of the waste stream onto local governments. Any sale or distribution bans needs to be fully analyzed and considered, specifically the potential unintended consequences of alternatives that could be used to replace banned materials.
- In devising any type of ban it is essential that all stakeholders are consulted adequately to assess implications, need for exemptions, and possible unintended consequences. Therefore, specific consultation needs to occur with industries and local governments to discuss further.

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

- Exemptions should be considered in situations where there is a medical reason for the use. For example, bendable straws should be provided to customers who request them for accessibility.

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? Should local governments be given the authority to ban problematic plastic items in their community? What types of bans should be considered?

- Bans on plastic packaging and single-use items are best suited for implementation at higher levels of government in order to create uniformity for businesses and residents across regions. The Retail Council of Canada strongly supports senior government implementing a consistent ban with one set of rules for all of BC.
- The Province should explore bans on the sale or disbursement of single-use items and Other Flexible Plastic Packaging.

2. More Recycling Options

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?

- Amending the Recycling Regulation to include packaging-like products is a positive step to expand recovery and recycling of plastics. This should be carefully considered in terms of the potential increase in materials that could pass through stewardship depots and the infrastructure requirements. Consideration should also be given to whether it creates more work for the public to recycle the products.
- Any policy direction that would include the use of incineration of plastics, particularly within our airshed would not be supported by the FVRD.

- Agricultural plastics should be considered to be brought under the Recycling Regulation. A successful pilot program within the District of Kent proves that the agricultural industry can be supported to recover and recycle such materials.
- The trend to bring further materials under current stewardship programs could have negative consequences on the private waste management sector. It may divert certain commodities to a smaller number of waste management companies who have contracts with current stewardship programs. This could reduce competition within the sector by forcing smaller companies out of the market.
- The FVRD and member municipalities recommends that the Province include requirements for stewardship organizations to improve accessibility to recycling options for current and proposed items covered under the regulation. This includes increasing the number of depots where these materials are accepted and accessibility to rural communities.

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?

- Adding single-use items to the Recycling Regulation is likely to lead to further materials turned into a refuse derived fuel. The FVRD is against any policy that would promote incineration of plastics.
- Bans of single-use items is preferred over adding them to the Recycling Regulation because while some single-use items are already covered under existing stewardship programs, large quantities of these items are still littered or landfilled.

3. Expanding Plastic Bottle and Beverage Container Returns

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

- The inclusion of milk and milk substitutes in the beverage container deposit-refund schedule, especially single serve containers, is supported, as it provides clarity to consumers and it provides an incentive for the return of these items to recycling depots.

Do you have comments or suggestions on the ministry's proposal to create a uniform 10 cent deposit-refund for all beverage containers?

- A uniform rate for consumers of beverage containers is generally supported. Greater analysis should be given though to determine whether a fee higher than 10 cent might provide greater return rates (e.g., even greater returns might be observed with 25 cents).

Do you have comments or suggestions on the ministry's proposal to allow refunds to be electronic and paid in an alternative form of cash (e-transfer, cheque, in-store credit, charitable donation, or similar alternatives)?

- Amending the Recycling Regulations to allow funds for returned beverage containers to be made electronically and paid in alternative forms of cash is supported, as long as cash refunds are still provided as an option for those that prefer or require that method.

4. Reducing Plastics Overall

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

- The Provincial and Federal governments should work together on improving recycling labels in Canada so that consumers have standardized messaging. Clearer labelling on packaging, such as the On-Pack Recycling Label scheme, can increase recycling rates.
- The Province should push for standards and associated targets that result in increased investment in recycling programs and associated infrastructure. A weak target that is easily achievable does little to spur investment and innovation, whereas a high target will push stewardship organizations to expand collection options, and create opportunities for investment in recycling plants.
- Standardization for compostable plastics, and developing targets for products to contain recycled content in materials, are supported. Any recyclable targets should encourage investment for the waste management sector to collect, recover, reuse, recycle and process the materials within North America and to invest in a circular economy.
- It is important that government consults with industry bodies in developing any national standard.

If you have any questions or would like to discuss solid waste management concerns further, please contact Jamie Benton, FVRD Environmental Services Coordinator, at jbenton@fvrd.ca.

Sincerely,



Lance Lilley
Manager of Environmental Services