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September 4, 2019

Ministry of Environment and Climate Change Strategy
Recycling Regulation Amendments
PO Box 9341 Stn Prov Govt
Victoria, BC
V8W 9M1
plastics@gov.bc.ca

RE: Submission to the Public Consultation on the Clean BC Plastics Action Plan

Georgia Strait Alliance (GSA) is pleased to provide this submission as part of the public consultation on the Clean BC Plastics Action Plan.

GSA is a regional charitable organization that works to protect and restore the marine environment and promote the sustainability of the Strait of Georgia, one of Canada's most at risk environments, and its adjoining waters and communities. Founded in 1990, GSA has over 18,000 members and supporters who work collectively to address the root causes of threats to the Strait and find solutions that protect it. For nearly 30 years, we have been advocates for clean waterways and have raised the alarm about the impact of plastic pollution and associated contaminants on marine life in the Salish Sea.

The Georgia Strait is home to more than 125 marine species at risk, including endangered Southern Resident orcas, of which only 73 individuals remain. Cetacean species, including Southern Residents, are under threat from plastic debris and contaminants in marine waters. Impacts from entanglement in and ingestion of debris can be lethal or occur acutely over a long time scale and result in decreased individual fitness, reproductive health and survival¹.

During GSA's 29 years as advocates for the Strait and the Salish Sea, the protection of Southern Resident orcas has been a top priority. The population is considered an umbrella species, in that protection of Southern Residents and their habitat will result in protection of the Salish Sea as a whole. That is why we have been strongly in favour of actions to stem the flow of plastic debris and contaminants into the ocean, such as more rigorous regulations and advanced wastewater treatment for regional municipalities.

GSA supports a ban on single-use plastic packaging (with the exemption of those for health, safety and accessibility). As a primary method of tackling the issue, we also encourage the province of B.C. to hold industry accountable for managing the life cycle of designated products and consumer packaging via increasing Extended Producer Responsibility. GSA supports financial incentives for producers to create better designed products that can be disposed of responsibly.

In addition to a ban and industry accountability, GSA suggests the following actions:

¹ Kühn S., Bravo Rebolledo E.L., van Franeker J.A. (2015) Deleterious Effects of Litter on Marine Life. In: Bergmann M., Gutow L., Klages M. (eds) Marine Anthropogenic Litter. Springer, Cham

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Dramatically Reduce Single-Use Plastic in Landfills and Waterways

- The inclusion of tertiary treatment in the current upgrade to the Iona Wastewater Treatment Plant - Metro Vancouver's largest – and completion of the upgrade on an expedited timeline to minimize the quantity of microplastics and contaminants entering the Salish Sea.

Plastic Bottle and Beverage Container Returns

- Increased support for and expansion of the Binner's Project (www.binnerproject.org) to allow a greater number of informal recyclable collectors who positively impact the environment by diverting a considerable amount of waste from landfills.

Reducing Plastics Overall

- Incentives for businesses and consumers to use reusable containers.
- Funding research and development of cost effective packaging alternatives and recycling methods.

Additionally, GSA supports the following management actions to mitigate the issue of plastics:

- Research on and the concurrent development of regulations for plastic alternatives to prevent potential harm arising from mass adoption as the public transitions from plastics (e.g. some compostable single-use containers have been found to contain PFAS, a group of chemical compounds with known human health and environmental impacts^{2 3}).
- Funding for research on the fate of plastics and related contaminants that enter terrestrial and marine environments, so that the environmental impact can be mitigated.

These actions will be a step in the right direction, but more is needed. The current level of pollution in the Salish Sea, including microplastics, will take decades to clean up. There is an urgent need for a fundamental shift away from disposables and convenience culture towards a sustainable, circular zero-waste system – this is the only way to ensure plastics and related contaminants are prevented from entering landfills and waterways and harming the Salish Sea, its inhabitants and surrounding communities.

Thank you for considering our concerns.

Regards,

Christianne Wilhelmson
Executive Director

² Li, Fan et al. (2020) Short-chain per- and polyfluoroalkyl substances in aquatic systems: Occurrence, impacts and treatment, *Chemical Engineering Journal*, Volume 380, <https://doi.org/10.1016/j.cej.2019.122506>

³ Fassler, Joe (2019, August 27). Study: The “forever chemicals” in your takeout bowl may pose more dangers than previously thought. *The New Food Economy*, <https://newfoodeconomy.org/pfas-takeout-sweetgreen-chipotle-bowls-more-dangerous-new-study/>