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Company: London Drugs

London Drugs is a Canadian-owned department store chain with 82 stores in Western Canada. We have a significant presence in BC, with over 50 stores across the province and headquarters in Richmond. We employ more than 7,000 staff and serve over 45 million customers every year. Sustainability has always been important to us and ever since our founding in 1945, we've strived to be a responsible business. We focussed our efforts into the Green Deal program. Launched in 2008, it is composed of 4 pillars: Upstream buying, Energy and operations, Waste minimisation, and Customer/Employee education. We work with our vendors to improve the sustainability of their products, reduce our carbon footprint through operational efficiencies, minimise waste generation through extensive recycling programs, and maintain a blog to help people live greener lives. Most well-known for our recycling programs, we've diverted over 120 million pounds of material from landfill over the past 10 years. Customers can bring back pretty much anything they purchase to be recycled, including: paper and plastic packaging, electronics, appliances, batteries, light bulbs, and medications.

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?

We need to be cautious of the unintended consequences of bans. We must ensure that viable alternatives exist and fully research the environmental impact of these alternatives. They must be either readily recyclable or accepted by compost facilities. We should ban materials that have acceptable alternatives that are overall better for the environment. Priority bans should be for the most harmful materials, such as Styrofoam.

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)?

There should definitely be disposal bans, but only for items that are readily accepted for recycling/composting. Bans on the use or sale of packaging should be reserved for those materials with viable alternatives.

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

There need to be exemptions for health, safety, and accessibility reasons.

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 need to be implemented at the highest level of government possible. This ensures harmonisation of policy, allowing for economies of scale. The patchwork model of municipalities enacting their own bans with varying rules makes it difficult for businesses to comply. We need to be operating on a single set of rules, at the minimum on a provincial level.

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?

Packaging-like products can be included in the Recycling Regulation as long as they are actually recyclable.

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?

Single-use items should definitely be added to the Recycling Regulation. But we must ensure that the items added are actually recyclable in the current

infrastructure. In addition, it must be convenient for people to recycle these items.

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

We think it is a necessary thing. While we understand the concerns about price increases for low income individuals, it is important to recognise that this is a deposit and not a fee. It is easy to reclaim the deposit in the existing system and not at all burdensome.

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

This is a great idea. Having a uniform deposit would reduce the complexity and confusion in the system. It would streamline the refund process for our stores and save time, allowing us to spend more time on customer service.

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)?

This is also a great idea. While many do use deposits as a source of change, others do not like to carry change around. Electronic alternatives cater well to these consumers. In addition, non-cash refunds reduce complexity for our business.

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

A recycled content standard would go a very long way to improving the recycling industry in Canada. It would affect the entire supply chain. Requiring recycled content would force manufacturers to seek out high quality recycled material. This would force recycling companies to improve the quality and

reduce contamination. In order for this to occur, collection must be improved, and consumers would become better at sorting and cleaning their recycling.

A recycled content standard would create an economy for recycled content. It would incentivise local recycling capabilities, a very important step in moving to a circular economy.

The following should be considered:

- Is it viable to add recycled content to existing packaging/products? It will change the look, feel, and quality of the packaging/product.
- Is it safe to add recycled content? Are there health and safety concerns?

Do you have comments or suggestions on any related provincial policies or actions?

I urge you to look at the science. Plastics have become a very emotional issue for people, and governments have been quick to respond to that emotion, even to the detriment of the environment. There have been several life cycle assessments and studies conducted on particular items, materials, and the recycling industry as a whole. Take a measured, logical, and practical approach to policy. Look at what other jurisdictions have done and the effects of those policies.

I would also like to see investment in chemical recycling. It is undoubtedly the future of recycling and the circular economy. There is lots of interesting innovation happening in this field, and some viable solutions already exist. Funds are required to scale these solutions and make them feasible. Please invest in these companies.