

September 30, 2019

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

Dear Ministry of Environment and Climate Change Strategy:

RE: CleanBC Plastics Action Plan - Policy Consultation Paper

The Lower Mainland Health Organizations (Provincial Health Services Authority, Fraser Health, Vancouver Coastal Health and Providence Health) and Interior Health's environmental sustainability departments respectfully submit the following comments regarding the CleanBC Plastics Action Plan. As representatives from the public health sector, we recognize the need to preserve the natural environment for the health of our patients, staff and communities. We support actions to reduce plastic, and do not seek an outright exemption from the proposed policy changes. However, health organizations will need flexibility in the implementation of new policies and amendments, due to healthcare's unique need for plastic products.

Healthcare is a large waste-generating sector in BC, utilizing tonnes of plastic. The amount of plastic waste generated in hospitals and healthcare facilities is a common source of complaints from healthcare workers. In the healthcare sector, the use of disposable plastics is often necessary for health and safety reasons, particularly infection control. Plastic packaging protects sterile healthcare products in transportation and during storage from adverse outcomes, including exposure to infection agents and toxic substances. Wherever possible, we favour safe and environmentally-sound sterilization and device reprocessing of reusable products (i.e. autoclaving, steam management, chemical treatment, etc.).

Limiting single-use plastics may be a way forward, however because this is not always possible for every situation, ensuring the recycling infrastructure is available is highly recommended. Recycling healthcare waste is extremely challenging; some plastic waste from healthcare facilities is not accepted in commercial/institutional recycling streams due to safety concerns at the recycling facility. Consequently, the commercial/institutional recycling streams available to the health sector differs from residential streams. Staff working in a healthcare facility may not be able to recycle similar products at work, compared to their residential setting, resulting in confusion and contaminated recycling. Therefore, it is recommended that government focus as well on ensuring the recycling market exists, including encouraging innovative solutions for resale/reuse of plastic products.

Additional challenges for decreasing plastic waste are described in Table 1. Due to these obstacles, opportunities to reduce plastic in healthcare are typically determined on a case-by-case basis.



Table 1: Challenges associated with reducing plastic waste in healthcare

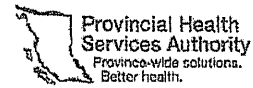
Maintaining the highest standards of patient care & safety.
<ul style="list-style-type: none"> • Some single-use plastic items and packaging are necessary to reduce risks from the spread of infection and disease. • The health sector has a range of patient needs to consider. Contextual solutions are required to maintain safety and dignity. For example, the materials for cutlery used in psychiatric units cannot be weaponized, therefore plastic cutlery is the preferred product to use in these cases. • Patient mobility and accessibility must be prioritized. For instance, there are circumstances where patients need to use straws, so alternatives must meet both infection control and practicality guidelines (i.e. paper straws left in a water cup will disintegrate).
Re-using instead of relying on single-use plastic products.
<ul style="list-style-type: none"> • Cleaning and re-using some plastic products is not possible due to time constraints in patient care processes. • Some items are too difficult to clean and safely use again, such as plastic tubing. • We are cognizant of costs associated with cleaning and reusing items.
Finding feasible alternatives to plastic.
<ul style="list-style-type: none"> • Suitable alternatives to plastic products might not currently exist on the market or be available through supply chain contracts. • Healthcare facilities may not have the means to recycle plastic alternatives appropriately, including collection and storage of compostable items.
Recycling plastics from healthcare facilities.
<ul style="list-style-type: none"> • Medical plastics and packaging are not always accepted for recycling due to health and safety risks at a recycling processing centre. • Recycling streams have high contamination rates, straining the entire recycling system. • In some jurisdictions (particularly the interior and northern regions of B.C.), there are not enough recycling providers.

Our response to the proposed actions include the following:

“Determining which types of plastic packaging to phase out altogether, as well as any necessary exemptions, such as those for health, safety and accessibility to keep products available for the people that need them.”

We support a reduction in plastic products and packaging, but a complete ban is impracticable and should be phased in with provisions for the healthcare sector. Specific plastic products will require exemptions to prevent the spread of infection and maintain quality patient care. However, other plastic reduction opportunities in healthcare should not be ignored.

Healthcare stakeholders will need to assess all proposed bans for safety, cost, and feasibility to avoid unintended consequences. For example, replacing a plastic straw with no straw, or paper straws, is not appropriate for some patients in care. Phasing in policy change may be necessary to adjust practices and enable the market to develop innovative solutions for healthcare facilities.



The CleanBC Plastics Action Plan can support plastic waste reduction in the health sector by mandating suppliers to develop take-back opportunities, and ensuring the product is re-purposed or further recycled.

“Requiring producers to take responsibility for more plastic products, ensuring more single-use items like sandwich bags, straws and cutlery get recycled.”

We encourage the expansion of the Extended Producer Responsibility (EPR) program with additions to the Recycling Regulation for plastic products used in healthcare. The EPR program is conducive for advancing innovation in the design of healthcare products. This will ensure plastic can be adequately recycled, reducing the burden of plastic waste on landfills and health authorities.

“Supporting effective ways to prevent plastic waste in the first place and ensuring recycled plastic is re-used effectively.”

We support the development of national recycled content performance standards, and encourage the application of these standards in healthcare. By purchasing items with higher recycled content, the health sector can reduce the amount of virgin plastic sent to landfills. The introduction of recycled content standards may also add value to plastic waste, incentivizing recycling providers to broaden their services to health authorities.

Overall, the sustainability departments from BC's health authorities advocate for the consideration of the health sector in the CleanBC Plastics Action Plan. The proposed actions should apply to health organizations and their supply chains, but allow for exemptions or flexibility in the scope and timelines of implementation. CleanBC can accelerate plastic waste reduction by fostering innovation and encouraging health organizations to rethink current practices. Healthcare operations use a significant amount of plastic, presenting a substantial opportunity to spur market transformation and decrease pollution. Reducing plastic waste will ultimately help preserve the natural environment that humans depend on for health and well-being.

Sincerely,

Robert Bradley
 Director, Energy and Environmental Sustainability, Lower Mainland Health Organizations
 robert.bradley@vch.ca

Tanja Stockmann
 Environmental Sustainability Manager, Interior Health
 tanja.stockmann@interiorhealth.ca

