



If a product can't be reused, repaired, rebuilt, refurbished, refinished, resold, recycled or composted, then it should be restricted, redesigned, or removed from production.

-Paul Connett,
Zero Waste International Alliance

1. Bans on Single Use Packaging

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

A careful selection of bans could help at this time: criteria should be domestic recyclability throughout product life-cycle rather than on sale or use. Right now most packaging is single-use and I don't think we can change our dependence on plastic packaging that fast. We could ban small items like straws and cutlery typically end up as residual (garbage) MRF products because they are too small for the separators and balers.

Polystyrene foam and Expanded Polystyrene packaging should be banned at the Federal or Provincial level. Recycling (compacting in BC, shipped to China) technology is grossly inadequate to manage the volume, and the recycled end-products (re-manufactured in China) have single use before disposal. EPS remains a persistent product with a tenuous market, at best.

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

Multi-laminate packaging, should

1. be banned because it is designed for incineration. Plastic producers know this and currently get a free ride through the EPR system straight to Recovery (incineration). Recovery is not Recycling, no matter how effective Plastics Industry lobbying has become. Bans will take time.
or
2. be managed within Recycle BC EPR program with prohibitive producer fees that discourage production. This option could be implemented today.

What types of bans should be considered?

Disposal bans can have high and immediate impact: Most landfills have upwards of 60% recyclable and 40% compostable material. Why?

1. Most landfills have bans. Most landfills don't monitor or enforce their bans because most landfill budgets are challenged from increased diversion and they need the revenue, regardless of the product.
2. As long as garbage disposal is cheaper than recycling, profit driven garbage haulers will use the "contaminated recycling is garbage" rationale and dispose of valuable recyclable products in landfills.
3. Regulate increases in landfill tip fees. "Given current market prices, structures, business models and the low cost of disposal, there is limited direct economic incentive for plastics recycling and value recovery in Canada" Economic Study of the Canadian Plastic Industry, Market and Waste



CleanBC should require all Regional Districts to ban recyclable products (at least all EPR products) and require MoE to monitor and enforce Regional District landfill bans.

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

Consider that exemptions create loopholes.

Medical products obviously have to wait for ban consideration.

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?

Bans should wait until we understand secondary feedstock requirements for an upgraded mechanical and chemical recycling system. Why ban a product that turns out to be 100% recyclable within a new or existing system? Once we understand true diversion for an upgraded system of domestic capture and recycling, we can consider bans for residuals (left-overs). At that time, federal bans should lead the way for provincial compliance.

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

No. Leadership must come from the provincial and federal authority. Regional Districts are fundamentally conflicted because of the requirement for landfill revenue. Targets won't be met.

2. More Recycling Options

Do you have comments or suggestions regarding the ministry's proposal to include packaging-like products in the Recycling Regulation?

1. Recycling Regulation should be amended to include packaging-like products. They do not differ in content from current EPR plastics.
2. Ideally, these products could be collected, processed and managed through existing residential packaging infrastructure. This could happen today.

Are there any packaging-like products you believe should be exempt from the Recycling Regulation?

Ocean plastics will need an entirely different responsibility paradigm. Instead of promoting ocean fish farms, DFO could be reminded of their mandate to protect our oceans. Federal DFO could manage EPR for ocean plastics. Green jobs and new definition of "fishing" for fishers.

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

1. Single-use plastic generated from Commercial and ICI use should be included in the Recycling Regulation. These same products are currently in residential EPR.
2. Regulate that single use plastic must be 100% recyclable within Canada's domestic recycling system ("Recyclable" is different from recycled content)



Are there any single-use items you feel should be exempt from the Recycling Regulation?

No. No industry should be exempt from an environmental emergency.

4. Reducing Plastic overall

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

1. Clean BC should formally align with proposed Federal integrated 5 intervention approach to plastic outlined in the Economic Study of the Canadian Plastic Industry, Market and Waste. Specifically Clean BC should emphasize programs that
 - a. de-couple plastic from virgin extraction,
 - b. promote viable secondary end-markets,
 - c. increase mechanical and chemical recycling,
 - d. support research and “on the ground” testing of innovative use for secondary products.
 - e. De-emphasize waste-to-energy options as low value/high unknown toxicity risk. Avoid the need to cite toxic waste landfills.
2. Clean BC should align with proposed federal content standards. These must include **both content standards** –
 - a. recycled content and
 - b. recyclable content.
3. Clean BC should align with the federal RRRDR programs to support Remanufacturing, Refurbishment, Repair and Direct Re-use
CleanBC should align and implement the proposed federal nation-wide monitoring of waste management and value recovery activities in order to track progress

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

Yes.

1. Environmental Management Act, Recycling Regulation, Part 2-EPR Plans

EPR Regulations are strong but application, specifically of the hierarchy, falls short of regulation potential.

According to the European Commission, more than 80% of a product’s environmental impact is determined in the design phase. http://www.buildup.eu/sites/default/files/content/Brochure-Ecodesign-Your-Future-15022012_0.pdf

The idea that the polluter-pays needs to be seen not as a right to pollute but as an instrument to promote changes in the productive system.

Approval of EPR Plans

Changes are needed to design waste out of the system.

Plans should reward upward progress through the hierarchy throughout life of Plan.



There must be capacity to influence removal of unsustainable products from production. Plan should ensure recycling and recyclability will substitute for the use of virgin materials.

Pt 2, 1 (a) (ii) and (iii) **Director must have proof that “the plan is capable of achieving any performance measures, performance requirements or targets established by the director”**

Mandatory Standardized Performance Measures are needed to ensure Pt 2, 1, (c) (vii). Require paper trails evidencing

“pollution prevention is not undertaken at one level unless or until all feasible opportunities for pollution prevention at a higher level have been taken.”

Require paper trails of progress toward sustainable design

Set maximum allowable tonnage or (tonnage percentage) for management by landfill and

“Recovery” (waste to energy)

Producer fee schedule is set entirely by proposed product management on hierarchy according to 3 (a) to (g). This is needed to reward reduction of environmental impact, and deter management by most economical option.

Pt 2, 1 (c) (vii) Saying that “**eliminating or reducing the environmental impacts of a product throughout the product’s life cycle**”

Is not sufficient. Mandate extension of producer responsibility to all the phases of the life-cycle.

Should read “eliminating or reducing the environmental impacts of a product throughout the product and product components’ life cycle.”

EPR Annual Report, Part 2, Section 8(2) (c)

Reports should reflect Mandatory Performance Measures above. Proof of efforts, rather than a description of “efforts taken by or on behalf of the producer to reduce environmental impacts throughout the product life cycle and to increase reusability or recyclability at the end of the life cycle”

Reward (through fee reductions) should be based on paper trail evidence of progress toward Reduce, Repair and design change for Recyclability, in other words, toward the highest and best use on the hierarchy.

2. Amend Recycling Regulation to include Commercial and ICI plastic and Mattresses, now constructed of 60% plastic, at a minimum.

Kind Regards,
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