

PAC NEXT Response to: British Columbia Plastics Action Plan

Review of BC Plastics Action Plan

PAC members are designing and using packaging based on a need to reach markets that are seldom solely just in British Columbia. Members often have a marketplace that is at least North America-wide, if not much greater. Between that geographic perspective and the shift of so much retail activity online, there are often limits on what a single jurisdiction can realistically accomplish by itself. However, we believe Ontario can be a leader. Please find below PAC NEXT's response to the BC Plastics Action Plan Policy Discussion Paper. This response is the result of the combined input from our members and represents our thoughts across those sections of the paper pertinent to our membership. Should you have any questions about anything contained herein, please contact either Jim Downham – CEO PAC NEXT (416-646-4637) or Daniel Lantz – Director PAC NEXT (416-986-7733) at your convenience.

Increase opportunities for BC residents to reduce waste

The government could improve British Columbia's residents' participation in waste reduction and diversion programs by promoting harmonization of recycling across Canada and setting regulations that expand the recycling program. Harmonization across the country would allow those companies paying EPR fees to help with the messaging to consumers; outlining what and how to recycle. More and more consistent messaging to residents is critical to achieving higher diversion rates.

As the IC&I sectors generate more than 50% of the total waste in BC, the government needs to understand better what could and should be done in business, communicate the new requirements and then ensure that companies are held accountable. The government could go as far as setting diversion goals for the IC&I sector. This is done in Europe where material diversion targets apply to all, not just the residential sector. Businesses should register with the Resource Productivity and Recovery Authority (or other such purpose-established authority) who would monitor their activities.

One of the reasons why diversion is so poor is the large discrepancy between recycling costs and disposal costs. With landfill options being available for approximately \$120/tonne (or less in the US) and full-scale recycling costing two or three times that amount, as companies look to stay competitive and keep costs down, naturally waste flows to landfills. Closing the border to exports or applying a landfill surcharge for materials flowing across the international border would create a disincentive to send waste to landfill. Surcharges or bans of materials should apply to material destined for landfill. The government should engage with stakeholders to ensure the tracking and the application of landfill surcharges is done in a manner such that it is not administratively burdensome to business. Recovered money could be used to support the recycling industry, promoting greater diversion.

Making producers responsible for their wastes

It would be best to look at EPR for the IC&I sector. The money that is collected under the 100% EPR program needs to be carefully monitored and administered to make sure it goes to necessary infrastructure that will improve overall recycling program performance.

All packaging and printed materials should be included in an industry-run EPR-based recycling program. All materials, with the exception of perhaps multi-laminated films can be successfully recycled. Having material available would create an incentive for industry to advance innovation to manage materials, e.g., leverage chemical recycling for the management of multi-laminated films. This would increase material available for recycled content plastics, helping close the loop.

Promote that materials need to be kept in the circular economy wherever possible. EPR programs should look at how producers could be credited with using recycled-content materials, i.e., as is done in the eeq program.

2.5 Reduce plastic waste going into landfills or waterways

There should be an increase in the availability of litter and recycling containers for residents in all communities. An increase in awareness of consequences and opportunities to better manage the materials must be provided. Greater enforcement of improper practices needs to be put into place.

More emphasis needs to be placed on developing recovery infrastructure that is not limited in the scope of materials managed. Also, how materials are managed, i.e., collected, processed and recycled, needs to be more closely examined and evaluated as a means of extracting the greatest value. Forcing everything through one program has not worked and does not show great promise moving forward. Consider looking at alternatives including deposit-return and depots for collection. Look at supplemental collection systems. For example, the Hefty Energy Bag (bright orange) for hard to manage plastics, successfully implemented in US jurisdictions and a pilot is being launched in Ontario in October is an example of an alternative collection approach which can increase recycling and potential recovery of materials or energy. Specialized recycling facilities for plastics, i.e., Plastics Recovery Facilities – PRFs and other means of recycling beyond just mechanical. Look at supplemental programs for hard-to-manage materials which separates the materials at the curb and makes them easy to identify in the material recovery facility. Another alternative is TerraCycle who recycles the "non-recyclable." Whether it's coffee capsules from your home, pens from a school, or plastic gloves from a manufacturing facility, TerraCycle can collect and recycle almost any form of waste. The company partners with individual collectors, as well as major consumer product companies, retailers, manufacturers, municipalities, and small businesses to capture materials, increasing diversion from disposal.

Banning single use products is not necessarily the answer. Very strict definitions of what qualifies as a single use product need to be developed. Decisions on bans of any products must be supported by a full lifecycle analysis, include an analysis of unintended consequences and consider the health and safety of the consumer, in addition to having viable alternatives available for use in the marketplace. The list of materials should be developed at a federal level, not just for Ontario.

Banning single use items will stifle innovation for the management of materials. For example, there are three new companies in Quebec that, through chemical recycling, can capture polystyrene and reduce the material to its monomer which can then be made into new products or packaging. Polystyrene takeout trays have been proven more environmentally efficient than their fibre counterparts (based on LCA studies). Bans have unintended consequences. At the Plastics Recycling Conference in Washington on March 12th, 2019, on a report of polyethylene film generation done by a market outlook firm, it was reported that the bans on single use plastic bags in North America have, in fact, resulted in an increase in PE film production. The majority of Canadians reuse their single use bags for in-house uses (e.g., as kitchen catcher garbage bags, etc.). By banning them, consumers end up buying alternatives to meet their needs. Rather than a ban, a charge for the use of the bag, and other single use product, would make consumers think of whether or not they need one, which would reduce consumption.

With a harmonized recycling program across all sectors, the provincial government could launch a province-wide campaign to help consumers understand what could and should be done with all packaging, not just plastic. An anti-litter campaign would help keep materials off the street and waterways.

Recover the value of resources

Landfill should be avoided at all costs. The provincial government should investigate options for management of materials in other manners, including mechanical and chemical recycling, alternative fuels and Energy from Waste. These alternatives should be considered as mandatory in all waste management plans ahead of landfilling, which should only be done as a last resort. Investing in chemical recycling innovations or at least

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supporting other agencies, such as MaRS, could help speed the introduction of this promising approach which, according to some experts, is still about 8-10 years from being fully operational at scale. The advantage of chemical recycling is that it allows plastics to go back to the monomer level which allows the plastics to be infinitely recycled, unlike mechanical recycling which limits plastics to about 7-10 cycles.

More efforts and innovation funding support should be provided to the development of end markets for all materials. This will help ensure long-term viability of the recycling industry. Also, the provincial government should lead by example by having a recycled-content requirement in all of its printed paper and packaging purchases. Increasing the purchasing of recycled-content products will provide a greater incentive to develop end markets, as companies will know there is a ready market.

Conclusion

Whatever is done in British Columbia should be replicable across Canada. Harmonization of policies and programs, as put forth in the CCME Zero Plastic Waste Action Plan, must take precedence. The province on its own is too small to have distinctly different programs and regulations than the rest of the country. This applies to all provinces. To have the greatest potential for success in address the plastic or any waste issue, the problem needs to be addressed at the national level.