



PAPER EXCELLENCE

September 30, 2019

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

Re: CleanBC Plastics Action Plan Feedback

Dear Sir/Madam:

Paper Excellence is a Richmond, BC based global manufacturer of pulp and paper products, with locations in Canada and France, including 6 facilities directly employing 2,300 people in BC alone. Sustainability is one of our core values and we strive to excel in our forest management, chain of custody, and environmental performance. Paper Excellence produces wood based pulps that are used across the world to produce paper products, and at home in BC we also produce a variety of paper products including packaging and specialty papers that may be particularly relevant to the Plastics Action Plan.

We support displacing single use plastics with renewable materials like paper however we are concerned with some of the proposed regulatory mechanisms, including the City of Victoria plastic bag bylaw referenced in your Policy Consultation Paper. The proposed bylaw effectively bans fully recyclable and sustainable paper bags in addition to plastic bags since it excludes products with less than 40 % post-consumer recycled content. There is no domestic recycled pulp manufacturing in BC, therefore this bylaw as written excludes domestic producers from their local market while driving higher emissions to import these products into BC.

Wood fibres are not infinitely recyclable and slowly degrade through each cycle, therefore the overall system relies on the introduction of a stream of virgin (never recycled) fibre into the supply chain to maintain quality and offset the inevitable attrition in the recycling system. The global recycling balance would collapse without a consistent influx virgin wood fibres into the system. An optimized system, from a global perspective, would have recycled products consumed closer to regions of higher consumption, the urban forest, and virgin products consumed in those areas that are lucky enough to be adjacent to the natural resource – as we are in BC. Finally, virgin paper products are, on an equivalent weight basis, much stronger than recycled containing products and therefore are better suited to displace a wider array of plastic bags.

We take exception to an argument made against paper as a renewable solution in the Consultation Paper that “A single-use paper bag can require up to four times as much energy to manufacture and produces two times the greenhouse gas emissions when compared to a single-use plastic bag”. We believe that this statement references a 2006 United Kingdom Environment Agency Report, Report SC030148, “Life cycle assessment of supermarket carrier bags: a review of bags available in 2006”, authored by Dr. Chris Edwards and Jonna Mehoff Fry. The analysis and conclusions reached in this

research report regarding the energy and GHG emissions attributable to paper bags may not be applicable in the BC context. The report assumes paper bags are imported to the U.K. and the footprint associated with transporting the paper from the point of manufacturing to point of sale is 1,200 km. BC can manufacture packaging paper for bag conversion within 73 km of Victoria and within 80 km of the Lower Mainland.

Secondly, the report assumes *“None of the bags considered were produced using UK grid electricity”*, they use an undisclosed distribution of European electricity sources, but based on other reports it appears that purchased electricity contributes over 30 % of the total carbon footprint attributed to paper in the report. Whereas BC’s grid supply is over 98% renewable and would have an insignificant contribution to the carbon impact of anything manufactured domestically. Further, our BC based paper mills have energy baskets made up of 90% renewable sources and have reduced their carbon footprint by 75% since 1990 and, as such, have amongst the lowest carbon footprint of papermakers in North America.

Third, the report is based on consolidated European kraft paper manufacturing data from 2003. There has been significant reduction in energy consumption and carbon footprint intensity in Europe and British Columbia in the past 16 years. Finally, European paper producers use much more whole log chipping to supply operations whereas most wood supplied to a BC mill is residual from the conversion of logs to dimensional lumber (i.e., taking a round log and making square boards), so there is limited energy and GHG emissions associated British Columbia’s residual wood chips. The referenced report does not detail the wood supply contribution in their assessment, however any comparison of paper manufacturing to BC needs to consider our unique operating context.

We urge British Columbian policy makers to be inclusive when considering paper alternatives and allow both virgin and recycled papers to be used in displacing single-use plastic packaging. We suggest a common BC regulatory framework rather than varying municipal restrictions would be beneficial and avoid unintended consequences.

Paper Excellence would be delighted to work with the Province and other stakeholders in exploring made-in-BC solutions where fully renewable BC forest fibre converted into fully recyclable and sustainable bio-based paper products can help reduce BC’s plastic consumption.

Sincerely,

A handwritten signature in black ink, appearing to read 'Graham Kissack', with a long horizontal line extending to the right.

Graham Kissack, P. Eng.
Vice President, Environment, Health and Safety
Paper Excellence Canada