



**RECYCLING
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THE EARTH**®

September 30, 2019

The Honourable George Heyman,
Minister of Environment and Climate Change Strategy
plastics@gov.bc.ca

Dear Minister Heyman,

We applaud the Government of British Columbia seeking a solution to the extremely critical problem of plastics and the global plastics crisis, currently impacting the planet's oceans, land, atmosphere, food chain and health of citizens, especially those in developing and coastal communities, where most of the world's plastic is piling up.

Recycling Alternative (RA) has been operating in the recycling sector for over 30 years. We were amongst the province's first recycling companies, and today remain 100% locally owned and operated. Recognized for our leadership and innovation in the field of commercial recycling, RA's programs focus on education and procurement strategies to help our clients reduce and prevent waste upstream, coupled with the commercial collection of clean, source separated recycling streams for best practices recovery.

We opened Vancouver's first co-location recycling hub in 2014, in partnership with the Encorp depot United We Can, which operates out of our shared facility in central Vancouver and are a designated commercial collector for a number of Extended Producer Responsibility (EPR) programs including: CESA, EPRA, Product Care, Call2Recycle. We operate a Metro licensed materials brokerage facility and are a member of Recycling Council of BC and Canada's National Zero Waste Council.

Over the course of 30 years, RA has witnessed and operated through many changes and strategic waste management policies in our sector. For those of us in the industry, the plastics and materials recovery crisis, the lack of local processing and Canada's vulnerability to global markets have become increasingly chronic since the 2008 recession. By 2014 industry stakeholders, such as ourselves were already dealing with declining market and recovery options, 4 full years before China closed its doors to North American waste; and plastics were at the top of that list.

We appreciate the opportunity to provide our feedback to the Province's Plastics Action Plan, and offer the following points based on over 30 years of experience collecting, processing and marketing materials on behalf of our clients.

We **support** the Government's approaches outlined in the consultation paper, as listed below:



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SUPPORT

- ✓ **#1) Bans on Single Use Packaging:** Bans can be an effective tool and can help drive producers to innovate or develop improved, recoverable alternatives. Exemptions to bans should be for specialized needs such as hospitals, health or medical. In all cases, any Single Use Packaging that is not banned should have a clear and transparent recovery profile that is communicated to the public, so that citizens have a clear understanding of the ultimate and environmentally responsible disposal or recovery of these items. We further caution, when developing the ban of single use plastics, that regulators understand the implications of replacing these with compostables, which have become equally undesirable in the waste stream, due to commercial composting operations not wanting large volumes of compostables in their processing streams.

Ideally bans should be federal, to ensure standardization and uniformity across all jurisdictions.

- ✓ **#3) Expanding the Deposit-Refund System:** We consider the current EPR program around beverage container deposit -refund to be amongst the most successful EPR's implemented in the province, as it can drive and support local, closed recovery systems. We support the inclusion of milk/ milk substitutes, along with increasing the deposit to 10 cents.
- ✓ **#4) Recycled Content:** RA supports regulation and standards that would require substantial minimum recycled content of at least 30-50% in products. This approach will help producers of waste, move away from their current '**linear**', **virgin production models**, in favour **circular innovation and recovery models**.

Caution: In tandem with this approach, however, RA urges the government to evaluate **where** recycling materials are being processed and recovered. Over the last year, news coverage has exposed the detrimental impact of exporting Canada's recycling and waste to other countries for processing. Not only is this material **not being recycled** as British Columbians and Canadians expect when they use the blue bin; in addition, it is creating extensive environmental damage in these 'processing markets', impacting the health of the most vulnerable citizens, living with our waste in these developing, non-regulated regions.

The carbon impact of shipping waste materials all over the world is significant, and will continue to impede the achievement of BC's Climate Change Strategy and the Province's emissions profile.

The future success of sustainable waste management and materials recovery, will be founded on provinces and countries managing their waste sustainably and locally. BC and



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Canada need to eliminate our current **linear export models** and replace these with **local, circular recovery models**, through regulating and incentivising, this type of innovation.

We **oppose and caution** the government's strategy relying on EPR to solve the plastics crisis as explained below:

- × **#2) Expanding Producer Responsibility for Packaging and Single-Use Items:** While RA supports many of the existing EPR programs in place in BC, we also believe that EPR's have a core flaw in that they are designed and implemented to manage and/or recover waste strictly from an **'end of tailpipe' perspective**. This key program flaw perpetuates status quo production practices of producers, and does not require producers to design waste out of their product, nor does it encourage consumers to reduce waste through behaviour change.

EPR's can be effective, responsible waste management tools when designed to manage hazardous or hard to handle products such as light bulbs, batteries, paint, medication, or for deposit-refund products that incentivize consumers to return products, thereby enabling producers to capture and recover these materials in their ongoing circular, local production.

In this vein, RA would support additional EPR programs for hazardous items such as disposable propane canisters, but not for items such as single use plastics, that have little or no recovery value due to their low quality, and are considered undesirable by recycling markets.

Expanding EPR programs to include low grade or single use plastics, without establishing a clear, local, industry recycling solution, will stifle innovation for waste elimination design, entrench current 'end of tail-pipe' disposal systems, and perpetuate status quo consumer behaviours as citizens are led to believe that lowest value plastics, which have no feasible recovery market, are being recycled rather than disposed.

Historically, EPR programs have focused primarily on the **collection, grading, counting and pre-processing** of materials, not on downstream accountability for best practices of where and how these materials are managed. Recycle BC EPR has suffered this 'end of the tailpipe' consequence, in its efforts to find solutions for BC's low grade domestic materials such as waste paper packaging, Styrofoam, coffee cups and shopping bags. By focusing on 'end of life plastics' waste management, we are missing the biggest opportunity to reduce carbon emission through reducing plastics use to begin with, and eliminating low grade, non-recoverable plastics

To tackle the plastics challenge locally, BC's EPR programs will need to focus program criteria **upstream** with producers, requiring them to design or eliminate waste out of their packaging and products.



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30 years of EPR's has **not decreased waste**, it has merely regulated its collection and its reporting. These programs have failed to incentivize producer design change or innovation, and have failed to drive consumer behaviour change in wasteful choices we may make.

Possible Options for Effective EPR Expansion Approaches:

To shift production and consumption of plastics from current **linear, export** models, to **circular, domestic** models, RA recommends the following criteria be used to guide BC's Plastics EPR regulation, shifting the producer responsibility 'upstream', towards the production and manufacturing of materials and items.

An EPR for single use Plastics could be effective if, the producer compliance with the regulation is based on performance criteria through the lens of production innovation that helps achieve BC's ultimate goal of reducing plastic waste.

The following regulatory criteria could be applied to evaluate producer compliance with an EPR that requires producers to:

- 1) Demonstrate they have **eliminated or reduced** plastic packaging required for their product delivery
- 2) Use 30-50% recycled content in their packaging design
- 3) Have developed circular rather than linear production systems, by utilizing materials collected through the associated EPR regulation that relates to their industry

RA would like to thank the Province of BC for considering plastic waste as a part of the CleanBC plan, and look forward to setting a positive path forward for the future.

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