



CLEAN BC PLASTICS ACTION PLAN

Gathered Feedback from Local Governments
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CLEAN BC PLASTICS ACTION PLAN - COMPILED FEEDBACK FROM LOCAL GOVERNMENTS

1. BANS ON SINGLE-USE PACKAGING

1.1 WHAT PLASTIC PACKAGING PRODUCTS ARE A PRIORITY FOR B.C. TO BAN?

- Follow the EU lead to include plastic cotton swabs, cutlery, plates, straws, drink stirrers and balloon sticks, as well as polystyrene foam containers and products made from oxo-degradable plastics.
- Ban magazines, reports, directories and newspapers that are encased in plastic wrap.
- Ban giveaway products that produce waste.
 - This could be free samples in tiny containers or plastic wrap, small toys with fast food meals, swag at conferences or events, or little bottles of liquor attached to bigger ones. These products are often wasted as the consumer usually gets them without consent.
 - Exempt systems such as sampling food in a grocery store or farmers' market where the waste can be minimized and the consumers are asking for the item from a person.
- Work to end the use of all expanded polystyrene foam in packaging, along with marine uses like for docks.
- Work to phase out materials that cannot be recycled or composted. The push towards multi-laminate plastics is a significant problem. Collecting them to burn as fuel wastes their embodied energy and releases GHG's while perpetuating their continued production.
- Watch for wording that can allow other plastics that can slip past the ban if not defined, such as oxo-degradable plastics.
- Keep bioplastics out of production and waste streams until standards and labelling can be developed.
 - Work with EPR programs to develop a collection stream for them that will not contaminate other material streams.
 - Conduct lifecycle analyses to assess whether these materials are advantageous compared to conventional plastics or naturally-sourced materials.
- Compostable plastics should not be encouraged as they will lead to contamination and processing issues.
 - The exception is fruit and vegetables stickers. All stickers associated with marking fruits and vegetables should meet backyard composting standards. Stickers designed for placement on fruit or vegetables should compost quickly and safely in the presence of air and water.
- Consider the full system impact of materials and make policy decisions based on evidence from objective sources (aka not an industry-funded study).
 - One standard argument for plastics is that they are lighter for transport and thus reduces greenhouse gas emissions. Another is that they may preserve food longer (though this claim should be independently studied and verified). However, from a broader system-wide perspective, it may be better to emphasize reuse. For example, refilling pop bottles locally and drinking local water instead of shipping it from another country.

- Examine how some food producers waste large amounts of produce that doesn't fit nicely into the containers. A push for unpackaged food, grown locally and eaten seasonally would have more beneficial impact than allowing a global food system to produce a lot of unrecyclable and unrecycled packaging with concurrent impacts related to pre-consumer food waste, habitat loss, soil nutrient loss, deforestation, fertilizer run-off, etc.
- Another argument is that single-use items are needed for sanitation or food safety concerns. While some of these uses are legitimate, many pose a very low risk associated compared to the much greater health risk associated with runaway climate change and other environmental impacts.
- Prioritize banning plastics that aren't recyclable first. For example, plastic bags (recyclable) should be lower in priority as opposed to non-recyclable plastics like straws and cutlery.
 - There might be more restrictions on the commercial side, but ideally a focus on non-recyclability should still be seen as the first priority.

1.2 WHAT TYPES OF BANS SHOULD BE CONSIDERED? (DISPOSAL/SALES)

- Disposal bans are hard to manage and enforce, putting the onus on local jurisdictions. They should only be implemented if there are alternatives options available (recycling, composting, etc.)
- When considering disposal bans, ensure plastic streams are not burned elsewhere. This includes the production of alternative fuel for cement kilns and other locations that are burning waste as forbidden methods of disposal.
- Key bans should be placed as soon as possible by the provincial government. Once the federal government puts in place their changes, efforts should be made to harmonize BC's rules with theirs, but only if they are stronger (a race to the top). Local governments should be allowed to enact their own bans.
- Design policy for a substantial reduction in single-use items made from all materials **first**, before moving to replacement with better and renewable materials. Even a renewable material can still have a significant environmental footprint, so work towards reusable items made of easy to reuse and recycle (e.g. glass or metal straws, cloth bags, refillable glass bottles, wooden or metal cutlery, etc.)
- Sales or distribution bans would be easier to manage for LG's than disposal bans. One consideration to keep in mind is that consumers may shop elsewhere outside of jurisdictions due to imposed bans, putting local businesses at a disadvantage.
- Examine the possibility of restricting certain types of packaging versus a complete prohibition.
- B.C. should take the lead on adopting bans on single-use plastics instead of waiting for a national strategy, as it will take time for federal policies to take effect.

1.3 HOW SHOULD BAN EXEMPTIONS BE CONSIDERED?

- Work with credible sources like the Associations for Speech Language Pathologists, Dietitians, and Occupational Therapists to determine the need for medically necessary single-use items.
- Ban exemptions should be considered only when there is clear, unbiased (as in independent, non-industry funded) evidence that the ban will be problematic for individuals with unique health needs.
 - Hardship or unwillingness to change from industry or business should not be a rationale for exemptions.

- Define what is an accessibility device and have in-depth consultations with the affected groups.
- Undue hardships should be utilized as a guideline. Local governments cannot trump provincial legislation, but if the affected group can establish that there are no other alternatives, then that might cause for an override.
 - E.g. if straws are banned provincially, but if a group is overlooked, local governments should be able to appeal or apply for exemption without abusing or bypassing the intent of the ban.
- Consider that exemptions may be exploited as loopholes for the continued use of single-use plastics.
- Consider the need for consultations on the need of certain items (like bendy straws) as disability devices, as reusable alternatives can pose potential safety issues.

1.4 ARE THERE BANS BEST SUITED FOR IMPLEMENTATION AT THE FEDERAL, PROVINCIAL, OR LOCAL LEVEL?

- Amend the *Community Charter* so that local governments can enact bylaws to protect the environment. This is needed now more than ever with the climate emergency and could also help with problematic products that may be unique to some communities. For example, many communities work to curb invasive species while stores in their communities still sell the plants they are trying to remove.
- Clarify what “local government” means. The authority of regional districts as well as municipalities also needs to be better clarified.
- Local governments still would like some authority over managing and protecting their local environment. There is a nesting of roles and powers are not mutually exclusive.
 - Strategy should exist for a minimum level that the province can enact; local government can go beyond and complement that.
 - Need to work out a clear role for the regional district as well.
- Regulate single-use items in the same way as the BC Step Code. Set an outside date that single-use items need to be eliminated and provide local governments the authority to move as quickly towards this date as they wish, without needing to seek approval from the Province to do so. For example:
 - Plastic bags, 2020
 - Straws, 2020
 - Takeout containers, 2021
 - Plastic cutlery, 2021
 - Coffee cups, 2022

This allows it to have a set time it needs to be done, but then doesn't slow local governments down who want to move more quickly. This strikes a balance between provincial control and local government autonomy and is based on pre-existing provincial regulation.

- Look to Connecticut as an example of balancing jurisdictional powers: A statewide act mandated that retailers charge a fee of \$0.10 per single-use plastic checkout bag less than 4 mils thick. “Single-use checkout bag” does not include paper bags; reusable bags; newspaper bags; laundry or dry cleaning bags; or bags used only to contain meat, seafood, loose produce or other unwrapped food items. Municipalities can enact ordinances concerning plastic single-use checkout bags that are as restrictive or more restrictive than the statewide Act.

1.5 OTHER FEEDBACK ON BANS

- Consider supporting the kinds of activities that emphasize reduction and reuse, such as unpackaged food in farmers' markets, zero waste stores, pop refilling centers.
- Increase incentives for refillable beer bottles along with an expansion into the wine sector, encouraging the ability to buy loose (unpackaged) items like nails so that one can purchase exactly what is needed, and supporting initiatives for customers to bring their own refillable containers, etc.
- Bans should be tied to principles of environmental protection, and research should lead the way on this. For example, a ban should be placed on oxo-degradable plastics due to the fact that they can create microplastics pollution.
- Ban or work to impose additional penalties for non-recyclable materials so they are phased out by producers through the use of differential fees or poor material choice surtaxes.

2. REDUCE SINGLE-USE PLASTICS IN LANDFILLS AND WATERWAYS

2.1 ON INCLUDING PACKAGING-LIKE PRODUCTS AND SINGLE-USE PLASTICS IN THE RECYCLING REGULATION

- Including packaging-like products in the Recycling Regulation would reduce confusion and frustration for curbside recycling programs by reducing the need for residents to distinguish between packaging and product.
- Including more materials to the Recycling Regulation may lead to additional confusion due to the prevalence of non-recyclable materials (e.g. plastic-lined paper), imposing a knowledge burden on residents to learn about the various materials in the Recycling Regulation.
- More focus should be placed on reduction instead of recycling.
- Include packaging and printed paper generated from the ICI sector under the Recycling Regulation.
- Getting more clarity in Schedule 5 of the Recycling Regulation would be ideal.
- Inclusion of additional single-use plastic items used for food or parties in the recycling stream may increase the level of contamination. These materials will not be 'easy' to recycle as indicated in the CleanBC consultation document. There is a potential for increased food contamination and more misunderstanding of what can be recycled. Contamination, especially in mixed recycling streams, raises the costs of recycling as a whole and may impact local government and private sector collectors as we can be fined for contamination.
- Utilize bans rather than EPR inclusion for certain items, such as stir sticks and cutlery, as those items are not suited for collection and processing at MERF's.
- Include packaging-like plastic products like freezer/sandwich bags, wrapping paper and moving boxes, but also look at the product's lifespan and material composition:
 - Example: Durable products that are designed to be reused and that will last a long time such as a Rubbermaid/Tupperware product should be encouraged over a very thin Ziploc-type version of the same container that will last only a few uses.
 - Example: Products that come in glass canning jars which are from a renewable material and are designed to be used multiple times should be encouraged with incentives, not penalized.

- Consider including other plastics, such as non-electric plastic toys, decorations and novelty items, safety equipment like helmets and car seats, outdoor furniture, gardening equipment, construction waste, agricultural plastics, textiles, fishing gear, marine vessels, poorly designed plastic rafts (e.g. Explorer 200s), cigarettes (often including plastic filters), cigarette packaging, and blister packaging to the Recycling Regulation.
- Set up clear standards for what qualifies to avoid situations like slightly thicker plastic bags being called “reusable.”
- Require all retailers of oil containers (marine and auto) also to collect the containers. There are currently numerous challenges to find drop-off locations.

2.2 OTHER FEEDBACK FOR MATERIAL INCLUSION IN THE RECYCLING REGULATION

- Ensure the programs are meeting the intent of the Recycling Regulation in not just collection, but in reducing and reusing products.
- EPR programs should develop and report on circularity indicators.
 - Stewards should move towards management for reuse and circularity.
 - Mandate recycled content for obligated products in the Recycling Regulation.
- Set escalating targets for collection or products by sub-category and consider financial penalties for uncollected products
 - Verify this in multiple ways, including industry-funded waste audits in multiple jurisdictions.
- Set targets for public awareness levels of their ability to return regulated products that increase over time.
 - Require programs to either improve the rate by spending a certain amount of money on marketing, or impose an equivalent fine and have the province do it.
- Propose to institute standard container sizes for BC-made jams, sauces, etc., along with a program set up to clean and redistribute them to manufacturers akin to the BC Beer bottle program.
 - The same goes for companies that rent out moving boxes that can last multiple times versus those that will not.
- An innovation for consideration could be a free database of all packaging sold in BC that includes bar codes.
 - This would allow for each product to be identified by a smartphone app to let residents know where to take single use packaging for recycling.
 - Have the producers be responsible for this data would allow for the materials to be incorporated quickly in smartphone apps.

3. EXPANDING PLASTIC BOTTLE AND BEVERAGE CONTAINER RETURNS

3.1 ON INCLUDING MILK AND MILK SUBSTITUTES IN THE BEVERAGE CONTAINER DEPOSIT REFUND SCHEDULE

- The move to add milk and other beverages into the container deposit-refund schedule can help remove the confusion by users. Inclusion would simplify beverages, especially those that contain milk products in their top-three ingredients.

- The move to add milk and milk substitutes into the container deposit-refund schedule can cause confusion, as significant work was done to educate residents to place them for curbside collection in the first place.
- Experiences working with other jurisdictions (Alberta) on adding milk products to deposit programs show that it should lead to a reduction in confusion. “Anything you drink” is simple messaging, and milk containers can still be collected curbside.
- Placing beverage containers in curbside collection is not a concern as far as contamination, as a relationship currently exists between Recycle BC and Encorp with regards to refundables. Choice remains in regions between depot or curbside returns.
- Deposit items should be explicitly included in the Recycle BC program as the diversion rate is similar and residential collection is easier. If milk packaging is included in the deposit program, it should also be included in the Recycle BC program to promote diversion. Metal beverage containers should also be considered for inclusion in both the Encorp and Recycle BC collection programs. If residents do not want or cannot easily receive the deposit, then curbside should be encouraged for non-glass beverage containers.
- The commitment to review the impact in two years’ time is a good one.
- There is a concern that continued placement of containers in curbside programs can lead to lost deposit revenues and a net loss to the local community.
- Economic impact may not be problematic as the informal economy in some areas would likely divert that material stream and recover deposit values from curbside systems.

3.2 ON CREATING A UNIFORM 10 CENT DEPOSIT REFUND FOR ALL BEVERAGE CONTAINERS

- A standardized deposit helps streamline operates for more modern express depots and for retailers.
- 20 cents for all containers should be the deposit amount. Studies show that incentives must retain their power, so reducing the deposit on larger containers is problematic.
- Exempt producers that already charge more and have a direct-to-producer return system like Avalon Dairy and others who charge \$1 for each of their own branded milk bottles.
- Set up the system to make it easier to recycle beverage containers by banning container sleeves made of different material than the bottle, ensuring that only one kind of plastic is used.
 - Require container tops and tabs to remain attached to the container once open.
- Due to the enormous volume of beverage containers generated (1.3 billion annually), even high recovery rates (~85% in Alberta) may not be sufficient. Set a 20 cent deposit for standard containers and 30 cent deposit for anything over 1L to drive recovery rates even higher.
- If deposit values are set higher, people may be more inclined to return them on their own. This may be beneficial for some areas, but not so much for areas with a large informal sector (e.g. binners)
- Consider the ramification of any deposit changes on marginalized and homeless communities.
- Consider assigning the same standardized deposit values on bottle caps and single-use disposable beverage cups as well.

3.3 ON ALLOWING REFUNDS TO BE ELECTRONIC AND PAID IN ALTERNATIVE FORMS OF CASH

- Ensure that electronic payment does not destabilize the existing bottle depot network, nor allow for new ways to game the system.

- Cash must still be required as an option for those who don't have access to alternative systems.
- Unreturned deposits should be kept in a fund outside of the beverage programs (possibly funding awareness campaigns for EPR programs and the system in general) so that there is not a perverse incentive for a program to keep return rates low. Use of funds in this way also means that if awareness is high, there is less of a need for the education uses and more of the fund will be returned as deposits.
- Explore other jurisdictions around the world for innovative payment systems.
 - Germany has reverse vending machines placed in convenient locations and open 24/7

3.4 OTHER FEEDBACK FOR BEVERAGE CONTAINERS

- Incentivize the system to support the refilling of containers such as growlers, the Beer Bottle program, or the pop shops B.C. used to have. This would place the focus on reuse over recycling and be beneficial from a GHG emissions perspective.
- Health and safety is a topic that warrants attention for refillable or reusable containers. Providing clear direction on how people can bring their own containers will help make reuse a more viable option for both consumers and businesses.

4. REDUCING PLASTICS OVERALL

4.1 WHAT SHOULD B.C. CONSIDER IN THE DEVELOPMENT OF A NATIONAL STANDARD ON RECYCLED CONTENT AND ANY OTHER ASSOCIATED TARGETS?

- Develop a zero waste strategy that includes B.C.'s single-use reduction plan to ensure a harmonized approach and avoid unintended consequences of increasing environmental impacts through the switching to other materials.
- Phase out all subsidies to fossil fuels and fossil fuel infrastructure (both direct and indirect) that help manufacture virgin plastic at cheaper rates than recycled content.
- Consider product recyclability and not just recycled content so as not to create an additional unwanted material stream.
- Developing national standard content performance standards is a great idea.
- Develop clear standards for each type of plastic to keep the materials separate; that includes labelling of the various types of plastics and developing a system that doesn't foster the proliferation or down-cycling of more plastic, but rather keeps it in circulation for use as long as possible.
- Institute a standard ID code on plastics to provide a national level of assurance. For example, the Green Dot program in Germany.
- If developing a national standard takes too long, consider a B.C. only standard in the interim to lead the way.
- Involve the plastics industry in these discussions for their technical knowledge, but ensure that the playing field does not become tilted towards industry at the expense of the environment and society.
- Sustainable procurement policies should be pursued for the federal and provincial governments.
 - The province should develop model bylaws and policies for municipalities, non-profits, etc. as well as access to a research library that provides background information, tools and analyses to aid purchasing decisions.

- Encourage purchasing collectives to increase capacity and impact.
- Require the producers to fund marine clean-ups to a degree proportional to the amount of their product collected.
- Consider policies that keep products in use such as Right to Repair, requirements to publish repair manuals online, requirements to provide repair service, requirements to provide parts or plans for parts so that a repairer can make their own.
 - Institute mandatory five or ten year warranties and requirements for producers to actually repair returned items or use them for parts instead of destroying them.
 - Expand funding for repair cafes.
 - Make EPR programs really consider reduce and reuse in their program plans or add a fee to the programs to fund a provincial system.
- Work on consumer education to help consumers understand the complete impact of their purchasing decisions.
 - Start in schools and educate on quality over quantity, that cheap can be more expensive in the long haul, and systems to share infrequently used or expensive items.
 - Inform consumers of their rights.
 - Work in schools to develop literacy of why people consume and how to avoid consumerism as a habit or addiction.
 - Focus on determining values and paths to happiness over wealth.
 - Develop curriculum based on the Living Planet Index or ecofootprint concepts and ensure students understand food systems, nutrient cycles, resource capacity, where their own food comes from, where their water comes from, where their waste goes and what impacts their choices make on all systems.
- Ban advertising to kids under 18.
- Develop a GHG reduction plan based on the “GHG by system” measurement.
 - When looking at GHG’s by system instead of sector, the importance of reducing food waste and product consumption is apparent.
 - Address this and push for better GHG accounting systems to incorporate the full impact of BC-based demand for products and food instead of ignoring that impact.
- Push for the federal government to incorporate many of the suggestions above in a national program and in trade agreements.
- Start to consider that when reduce/reuse/recycle options are exhausted that landfilling of existing plastic (over waste to energy) is a form of carbon sequestration.
 - The primary goal should be to reduce but the use of existing plastic for energy should be carefully weighed against the fact that it is a fossil fuel and that we have lost the privilege of time to add more carbon to the atmosphere while getting our systems in order. Do not pursue waste to energy systems for mixed waste or plastics.