



Regional District of Central Kootenay

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The Honourable George Heyman
Ministry of Environment and Climate Change Strategy
Recycling Regulation Amendments
PO Box 9341 Stn Prov Govt
Victoria, BC V8W 9M1

Dear Minister Heyman:

RE: CLEAN BC – PLASTICS ACTION PLAN

Thank you for launching the Clean BC Plastics Action Plan and for providing the opportunity for local governments and residents of British Columbia to submit feedback to shape this important program. The Regional District of Central Kootenay (RDCK) is updating our Solid Waste Management Plan; interest from the provincial and federal governments in plastic waste will certainly aid in achieving our long-term diversion goals.

We appreciate much of the information and initiatives presented in the Clean BC Plastics Action Plan Consultation Paper. This submission reflects our support for the four primary actions described in the paper, and highlights several issues of local concern that we would like to see addressed:

1. Bans on Single-Use Packaging

What plastic packaging products are a priority for BC to ban?

Many single-use plastic items are difficult to recycle due to their material composition and intended use away from residences where most people collect their recycling. Single-use plastics that can be replaced with viable alternatives and those that cannot be recycled should be banned from sale and distribution in BC for successful reduction of plastic waste. The consultation paper only suggests bans on single-use packaging, however bans on other single-use items such as plastic utensils, straws and stir sticks should also be considered.

Energy recovery through incineration of these materials may effectively reduce the amount of plastic packaging heading to landfills but it is a low priority option on the Pollution Prevention Hierarchy (PPH), does not reflect real material recycling, and is either not available to rural areas or associated with long distance transportation and GHG emissions.

Bans on single-use plastic products would be a more effective method of reducing waste in accordance with the values of the PPH. RDCK suggests assessing the viability of banning the following items:

- Polystyrene cups, take out containers, and plates
- Plastic straws, stir sticks, and plastic cotton swabs
- Single-use plastic utensils and plates
- Biodegradable and oxo-degradable plastic packaging
- Multi-laminate plastic packaging
- Single-use plastic bags



Recycling downloads costs and pressures on to those responsible for solid waste management such as local governments. Fees or penalties levied on the producers could be used to offset recycling costs while bans are considered. Bans are more effective in encouraging redesign for re-use and recyclability and reducing plastic waste at its source. Phased implementing of bans should be considered, targeting the most difficult to recycle materials first, allowing businesses time to find viable alternative products.

What types of bans should be considered?

Bans on the sale and distribution of single use plastics will be the most effective type of ban in reducing plastic waste. Eliminating waste before it is produced is a guaranteed method to reduce plastics from landfills and the environment. Banning plastics from disposal is costly and difficult to enforce locally, and can only be effective if there are viable alternatives to disposal. All of which are downloaded costs and pressures on local governments, especially in rural and remote areas where recycling programs are challenging for even the most marketable of materials.

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

Exemptions should be considered only when recommended by credible, impartial sources. Assessments made by the national Strategy on Zero Plastic Waste can inform decision makers when considering exemptions at the provincial or federal level. However, local governments should have the ability to request exemptions that address local concerns. For a material to be granted an exemption it should be demonstrated that:

- Alternative packaging materials have a similar or greater environmental impact
- It is required for individuals with unique health and accessibility needs
- It is required for public health and safety issues

Aesthetics or inconvenience for manufactures and businesses in finding alternatives should not qualify plastic materials for exemption.

Are there bans best suited for implementation at the federal, provincial or local government level?

Bans implemented by the provincial or federal government would be the most equitable and likely the most effective in changing products made by international companies. However, local governments should have the authority to implement bans that address local concerns. Although several municipalities in BC have introduced bans on certain single-use plastic items such as plastic grocery bags, Regional Districts do not currently have the authority to implement such legislation. Clarification is needed on local government's ability to enact bylaws to protect the environment.

Provincial or federal bans would allow for consistent messaging and promotion, making transition easier for businesses and institutions. Local governments that wish to establish their own bans in advance of provincial action should be empowered to do so. Considering the potential impacts to solid waste management programs, local governments must be consulted with prior to establishing bans and exemptions.



2. More Recycling Options

Inclusion of Industrial, Commercial and Institutional Packaging and Printed Paper in the Recycling Regulation

The RDCK would like to use this submission process to again request that packaging and printed paper (PPP) from industrial, commercial and institutional (ICI) sources be included in the *Recycling Regulation*. The RDCK has recently signed agreements with Recycle BC (RBC) to join their depot collection network in spring 2020. By joining the RBC program RDCK residents will be able to recycle more types of PPP, but many businesses will be left with very limited recycling services. Similar to packaging and non-packaging materials the distinction between residential and ICI recycling can be very confusing, especially for small business operators who purchase supplies from the same retailers as residents. While some early adopting districts of the RBC system were allowed to collect residential and ICI recycling comingled, the RDCK was told at a late stage in negotiations that this is not an option for the RDCK at this time. ICI material must now be collected, hauled and processed separately from residential at a significant cost to the RDCK or be landfilled. Due to poor recycling markets for plastic and prohibitive costs the RDCK will provide recycling collection only for cardboard from ICI sources once transition to RBC is complete. Previously no distinction was made between ICI and residential recycling and both were permitted at all RDCK depots. Many businesses throughout the district self-haul their recycling and rely on RDCK depot collection; they will have very limited options to recycle their plastic waste. Private commercial recycling for plastics is costly even in densely populated areas and not likely to expand in the RDCK. Adding ICI packaging and printed paper to the *Recycling Regulation* will prevent this material, including plastics, from entering landfills and the environment.

Improvement of Extended Producer Responsibility Recycling Services in Rural Areas

The suggestions in the policy paper regarding increased recycling options are welcomed and supported by the RDCK. However, they will have a limited impact on plastics recycling in the RDCK and other rural districts if Extended Producer Recycling (EPR) recycling programs are not improved to better serve these parts of the province where recycling options are limited or sometimes non-existent. The RDCK suggests that EPR service standards be reassessed for rural areas of the province, especially for common items such as PPP. A consultation process for the service guidelines described in the *Recycling Regulation* should be conducted similar to this consultation regarding the Plastics Action Plan to gather feedback from all communities in BC.

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

While the transition to RBC depot recycling will allow RDCK residents to recycle more materials than they currently do, it will require significant education and promotion. Explaining to users why only certain items are acceptable, simply because one is packaging and one is not, will undoubtedly be difficult and frustrating for depot staff and users. Including packaging-like products in the *Recycling Regulation* will help make recycling plastic products easier for users and ensure that the producers and users of products are paying their fair share for the collection and recycling. Inclusion in the *Regulation* can also make producers accountable to pursue redesign of their products for greater re-use and recyclability.

Do you have comments or suggestions regarding the ministry's proposal to add single-use items to the Recycling Regulation? Are there any single-use items you feel should be exempt from the Recycling Regulation?



While bans on the sale and distribution of single use items are effective methods in reducing plastic waste, adding them to the *Recycling Regulation* as a transitory measure will reduce confusion for recyclers, apply a consistent standard to common items, and ensure producers are taking sufficient responsibility for the materials they generate. Both residential and ICI sourced single-use items should be included to capture the maximum range of materials. While some single-use items should be excluded from bans based on health and safety reasons, there should be no reason to exempt them from the *Regulation*.

3. Expanding Plastic Bottle and Beverage Container Returns

Do you have comments or suggestions on the ministry's proposal to include milk and milk substitutes in the beverage container deposit-refund schedule?

Adding containers for milk and milk substitutes to the existing deposit-refund schedule is long overdue. Increasing the range of refundable containers to include milk will encourage more container recovery. Compared to other plastic containers plastic drink bottles have a very high recovery rate. Further, it will help reduce confusion for recyclers and make all drink containers simple to identify as return-for-refund items.

Exemptions should be considered for low volume, specialty producers that supply a local market with an established return-to-producer system (for example, the Kootenay Meadows dairy in Creston).

Do you have comments or suggestions on the ministry's proposal to create a uniform 10 cent deposit-refund for all beverage containers?

Increasing deposit-refunds has been found to increase container recovery rates in other areas and can contribute to increased diversion in BC as well. In the RDCK and other more rural districts it is often non-profit organizations and local societies that operate bottle return depots and collections rather than commercial businesses, income from refunds is vital to their continued operation. An increased refund will benefit these groups as well as vulnerable individuals that participate in bottle returns.

Do you have comments or suggestions on the ministry's proposal to allow refunds to be electronic and paid in an alternative form of cash (e-transfer, cheque, in-store credit, charitable donation, or similar alternatives)?

Increasing convenience for customers will encourage participation and greater returns. Cash refunds must remain as a payment option to prevent marginalizing those who cannot access alternative payment methods.

4. Reducing Plastics Overall

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

Any national standard for Canada should meet the standards and regulations adopted by other leading countries, such as those proposed in the European Strategy for Plastics in a Circular Economy. Plastics recycling and manufacturing is market-driven and a large, coordinated market will help to create the necessary incentives to meet standards on recycled content in plastic products. Further to the goal of a circular economy, standards should be implemented for product life span and recyclability so that recycled content does not become a minimum hurdle that producers clear while producing another unwanted waste product. Penalties for failing to



include recycled content or meeting a standard for recyclability will drive product redesign. Standardized plastic types and associated labelling will assist consumers in separating materials, improving the quality of recyclables.

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

The provincial and federal governments should implement plastics-aware buying policies to lead by example and only utilize recyclable, durable materials. Consumer education programs should bring awareness to the full life cycle impact of the products they purchase. Reusable, recyclable and repairable materials should be championed over disposable, waste producing examples.

Alternative materials must be carefully considered as well, to ensure that replacements for plastic are not environmentally harmful in their own right. Future decisions about recycling collection and processing programs should be made with consideration to system greenhouse gas (GHG) emissions. For example, does the collection and hauling of Styrofoam and plastic films from remote depots make sense from the perspective of GHG production? Would local processing alternatives (even landfilling) for these materials be more beneficial than transporting them for recycling? Local conditions must still be considered when addressing an international issue such as plastic waste.

The RDCK supports actions to reduce plastic waste. Local governments play a large role in managing solid waste in British Columbia, and we request further consultation as programs and policies are developed. Thank you again for the opportunity to provide comments on this matter. We look forward to seeing advancements of the Plastics Action Plan.

Sincerely,



Aimee Watson
Regional District of Central Kootenay Board Chair

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