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The Honourable George Heyman  
Ministry of Environment and Climate Change Strategy  
PO Box 9341 Stn Prov Govt  
Victoria, BC  
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Date: Sept 19, 2019

Dear Minister:

**RE: Clean BC Plastics Action Plan Policy Consultation Paper – RDCO Submission**

Thank you for the opportunity to provide feedback on the Clean BC Plastic Actions Plan Policy Consultation Paper. Please find below the Regional District of Central Okanagan's submission and comments to questions identified in the Action Plan Paper.

**Section 1: Bans On Single-Use Packaging**

**Question 1.1 – Do you think bans on plastic packaging should be implemented in BC? What plastic packaging products are a priority in BC to ban?**

**Response:** Work to phase out materials that cannot be recycled or composted first.

Specifically work to end the use of the following single use plastics:

- Foam cups and foam take out containers
- Plastic shopping bags
- Polystyrene use in marine setting such as docks
- Plastic straws, stir sticks, and plastic cotton swabs
- Single-use plastic utensils and plates
- Biodegradable and Oxo-degradable plastic material
- Multi-laminate packaging

Although the scope of the Action Plan is focused on plastic waste, consideration should be given to include non-plastic single-use items that cause demonstrable harm to the environment, such as regulatory measures to reduce disposable paper beverage cups.

**Question 1.2 – What types of bans should be considered (examples include bans on sale of a certain type of packaging or ban on use of a certain type, or bans on disposal)?**

**Response:** Consider sales or distribution bans before disposal bans thereby reducing the material created. Disposal bans are reactive and are hard to manage and enforce. They should only be implemented if there are no alternative options available (e.g. recycling or composting). BC should continue moving forward on single-use plastic bans rather than waiting for a national strategy and should make an effort to harmonize wherever possible.

**Question 1.3 – If a ban was applied, how should exemptions be considered?**

**Response:** Ban exemption considerations should be evidence based and made in consultation with independent stakeholder groups that have the relevant expertise and experience to properly inform the decision makers. Exemptions should only be considered when a viable alternative is not available.

**Question 1.4 – Bans can be implemented in some form by all levels of government due to the different regulatory powers in place. Are there bans best suited for implementation at the federal, provincial or local government level? Should local governments be given the authority to ban problematic items in their community? What types of bans should be considered?**

**Response:** We need to recognize that authority in this area is nested in several regulatory powers (Federal, Provincial, & Municipal) which need to be clarified and rationalized in order to answer the question. Consider a roll out with the BC Step Code as a model where there is a deadline for changes at the local level however enabling each local government to move faster if it chooses – provides balance of provincial and local government control. Bans should be based on bona fide research and data by non-industry, independent organizations specializing in environmental protection (e.g. Oxo-degradable plastics and the creation of micro-plastics)

**Section 2 – More Recycling Options****Question 2.1 – Do you have comments or suggestions regarding the Ministry’s proposal to include packaging-like products in the Recycling Regulation? Are there any packaging-like products you believe should be exempt from the Recycling Regulation?**

**Response:** The RDCO is supportive of the ministry’s proposal to include packaging-like products in the Recycling Regulation and does not believe that any exemptions should be granted. Further, the Ministry should include all recyclable plastic products and packaging in the Recycling Regulation including materials generated from the Industrial, Commercial and Institutional sector to avoid consumer confusion. Expanded Extended Producer Responsibility (EPR) programs will create consistency for consumers which will increase education program effectiveness and support necessary behavioural change.

When considering the addition of products to the Recycling Regulation, impacts to existing collection and recycling systems should be considered. For example, bans should be considered rather than EPR inclusion for certain items such as straws, stir sticks and cutlery, as these items are not suited for collection and processing at recycling facilities.

**Question 2.2 – Do you have any 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?**

**Response:** More focus should be placed on reduction instead of recycling in keeping with promotion of the 3R waste hierarchy. The addition of single-use items to the recycling regulation should only occur for those materials that are readily recyclable and are suited to the existing collection and processing systems. All other single-use items should be banned at point of sale, distribution or production.

### **Section 3 – Expanding Plastic Bottle and Beverage Container Returns**

**Question 3.1 – Do you have any comments or suggestions on the ministry’s proposal to include milk and milk substitutes in the beverage container deposit-refund schedule?**

**Response:** RDCO supports the inclusion of milk and milk-substitutes in the container refund schedule (assuming this would be all milk and milk-substitute containers, not just plastic ones) so long as there is still opportunity for these materials to be included in curbside programs (i.e. arrangements between Recycle BC and Beverage Container Stewards for Recycle BC to collect this material curbside on behalf of beverage stewards).

**Question 3.2 – Do you have any comments or suggestions regarding the ministry’s proposal to create a uniform 10 cent deposit-refund for all beverage containers?**

**Response:** RDCO supports the standardized deposit of 10-cents per refundable container.

**Question 3.3 – Do you have any comments or suggestions regarding 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)?**

**Response:** Any method that increases convenience to customers and encourages participation and more returns should be promoted. That said, efforts should be made to addressing the negative impacts (organized crime preying on the homeless who collect bottles for cash to pay for narcotics) to existing partnering return depots. RDCO supports the addition of refunds paid in alternative forms other than cash.

**Question 3.4 – Other feedback for beverage containers**

**Response:** Incentivize a system to support refilling beverage containers.

### **Section 4 – Reducing Plastics Overall**

**Question 4.1 – What should BC consider in the development of a national standard on recycled content and any associated targets?**

**Response:** Develop an overarching zero waste strategy and circular economy approach where all plastics in the market can in fact be easily recycled. Include a minimum standard of recycled content to assist with ‘closing the loop’. Incentivize using recycled content over virgin plastics. Ensure a harmonized approach and avoid unintended consequences of material switching (i.e. cloth bags that end up in the landfill).

**Question 4.2 – Do you have any comments or suggestions on any related provincial policies or actions?**

**Response:** Consider policies that move the focus up the waste hierarchy. Eliminate the production of waste at the source, keep products in use as long as possible. Consider policies that keep products in use such as Right to Repair or requirements of manufacturers to publish repair manuals online and have spare parts available.

Incentivize the system to support refilling of non-beverage containers such as laundry soap, shampoo etc.

Ensure EPR Stewardship plans include reduction and reuse components, not just recycling.

Require retailers of oil containers to collect containers.

Having industry develop a free database of all packaging sold in BC that includes bar codes with return locations would be helpful to measure program activity and make better decisions.

Thank you again for the opportunity to provide feedback and comments on the Clean BC Plastics Action Plan.

Yours truly,



Brian Reardon  
CAO – Regional District of Central Okanagan

*Cc: Gail Given, Regional Board Chair  
Jodie Foster, Director of Communications & Information Services  
David Komaike, Director of Engineering Services*