



REGIONAL DISTRICT of Fraser-Fort George

Head Office:
155 George Street
Prince George, BC
V2L 1P8

Telephone:
(250) 960-4400
Long Distance
from within
the Regional District:
1-800-667-1959

Fax: (250) 563-7520

<http://www.rdffg.bc.ca>

Municipalities:

McBride
Mackenzie
Prince George
Valemount

Electoral Areas:

Chilako River-Nechako
Crooked River-Parsnip
Robson Valley-Canoe
Salmon River-Lakes
Tabor Lake-Stone Creek
Willow River-Upper Fraser
Woodpecker-Hixon

September 20, 2019

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

Dear Minister Heyman:

Re: RDFFG Response to Provincial Plastics Action Plan

Please accept the following paper as a formal submission from the Regional District of Fraser-Fort George (RDFFG) to provide feedback for the Ministry of Environment and Climate Change Strategy's Plastics Action Plan (The Plan). In keeping with the submission guidelines, the RDFFG has structured the response to provide feedback on the questions posed in The Plan.

1. Bans on Single-Use Packaging

1.1 What Plastic Packaging products are a priority for BC to ban?

The position of the RDFFG is that any effective ban must start at the producer level and that the Government of British Columbia should work in partnership with the Federal Government to hold producers of single-use packaging accountable for the waste they create. The answer is not to simply create 'different' types of plastic waste, such as bioplastics or compostable plastics, as both products lead to contamination and processing issues, but to curtail the amount of plastic currently allowed to be used in British Columbia.

1.2 What types of bans should be considered?

Bans for high-profile products like plastic bags and single-use consumer items can begin to drive behavior change and raise awareness amongst consumers. The focus of The Plan deals with symptoms of a much larger issue, including how recycling has become a band-aid solution to a consumption problem.

If producers continue to introduce single-use non-recyclable products into the waste stream, the problem will never be solved. Instead the focus should be on restricting certain types of plastic packaging or banning the sale and distribution of such products in the first place, instead of a disposal ban.

Disposal bans are hard to manage and enforce and put the onus on local governments with already limited resources.

1.3 How should ban exemptions be considered?

Ban exemptions should be considered only when there is clear, unbiased evidence that the ban will be problematic for individuals with unique health needs. There are a variety of credible agencies that should be consulted before undertaking such an exemption, including, but not limited to Speech Language Pathologists and Occupational Therapists. Any exemption would require a definition on what an accessibility device is as well as extensive consultation with effected groups.

Allowing exemptions also opens a potential loophole for industry to exploit the continued production and distribution of single-use plastics.

1.4 Are there bans best suited for implementation at the Federal, Provincial or local level?

Bans are only suited for implementation at both the Federal and Provincial level. Both levels of government will have to lead the way in establishing policy and regulations, along with the mechanisms in place to enforce such bans. Downloading bans onto local governments will not be effective and is cost prohibitive in many cases. Any ban that is enacted must be done in a way that allows businesses, producers, and consumers to understand it across both the Province of British Columbia and Canada.

Further, most local governments are not able to enact bylaws to ban such materials. The Provincial Government needs to define what they mean by 'local' government: regional districts or municipalities.

1.5 Other feedback on bans

The Plan should focus on reducing the amount of plastics allowed to be produced, sold and distributed in the first place, before disposal or recycling is considered. Achieving a full circular economy for plastics requires a two-fold approach: policy and education. In policy, Federal and Provincial governments need to take the lead role in establishing both policy and regulations, as well as the ability to enforce them. They must establish standards for recycled content across the lifecycle of new products to support the shift to a circular economy. Additionally, the Recycling Regulation must be expanded to include options for return locations in all jurisdictions - wherever products are available for sale to consumers, there must be an equal return/collection available.

Both levels of government need to take the lead in educating the public on what the circular economy is and how much single use plastic is being used and potential alternatives. Work together to develop an education campaign that focuses on Rethink, Refuse, Reduce, Reuse and Repair before Recycling.

2. Reduce Single-Use Plastics in Landfills and Waterways

2.1. On including packaging-like products and single-use plastics in the Recycling Regulation

Increasing the number of materials included in the Recycling Regulation could potentially increase user confusion. It imposes an unfair knowledge burden on residential consumers, instead of holding the producers of such materials accountable. Additionally, the Recycling Regulation for Printed Paper and Packaging only includes material from the residential sector. The Industrial, Commercial and Institutional sector should be included in this material category in order to achieve higher diversions rates. Increasing the number of products in an already confusing product category will lead to higher levels of contamination.

2.2. Other feedback for material inclusion in the Recycling Regulation

The Recycling Regulation currently sets a hard target of 75% collection province wide, with no consideration to regional, rural or northern collection percentages. The government should work to ensure that stewardship programs are meeting the intent of the Recycling Regulation, not just in collection, but in reducing and reusing products.

While the Ministry of Environment and Climate Change Strategy has encouraged stewards to move beyond the regulated 75% collection target, establishing escalating targets that address the issues of rural and remote collection would force producers into being fully responsible for their products.

3. Expanding plastic bottle and beverage container returns

3.1. On including milk and milk substitutes in the beverage container deposit refund schedule

Including milk and milk substitutes in the beverage container deposit refund schedule should go a long way in reducing confusion for users. More work would be needed to make users aware of the shift from putting containers in curbside collection to taking them back for a deposit refund.

3.2. On creating a uniform ten cent deposit refund for all beverage containers

As some beverage containers already have a 20-cent deposit, it would make more sense to raise the deposit return for all beverage containers to 20 cents. Increased return deposit rates can drive recovery rates even higher. Even achieving a 75% recovery rate in this product category leaves a huge number of containers that are not being returned.

3.3. On allowing refunds to be electronic and paid in alternative forms of cash

As long as cash is still a form of payment, alternative payment forms including electronic should be encouraged. Other options should also be researched.

3.4. Other feedback for beverage containers

None

4. Reducing Plastics Overall

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

A fundamental shift must happen to begin to deal with the high levels of plastic waste generated in BC. People need to move away from viewing recycling as the solution and instead focus on the over-consumption of material items in our day to day lives. Producers are continuing to make items that are hard to recycle because there is no policy to require them to ensure their products are part of the circular economy prior to market introduction. Producers need to be responsible for more than 75% recovery rate stated in the Recycling Regulation in order to be held truly accountable for the materials they produce.

The Regional District of Fraser-Fort George appreciates the opportunity to provide comment and feedback on the Provincial Plastics Actions Plan Paper developed by the Ministry of Environment and Climate Change Strategy.

We strongly encourage the Ministry to continue to work closely with all levels of government, including both regional and municipal governments to develop a policy that will benefit all British Columbians, including those that live in Northern and rural communities.

In our response, the RDDFG has highlighted a need to focus on refusal, reduction, and reuse as viable policy alternatives to the high level of plastic consumption and overall consumerism that exists within the Province. The RDDFG strongly believes that the focus needs to shift from recycling being the solution, to preventing the material from entering the market and subsequently the waste stream in the first place.

We hope these concerns are taken into consideration. We look forward to further engagement with the Ministry on this topic.

Sincerely,

A handwritten signature in black ink, appearing to read 'Lara Beckett', written in a cursive style.

Lara Beckett
Chair, Environment and Parks Standing Committee
Regional District of Fraser-Fort George