

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:

RE: Clean BC - Plastics Action Plan Policy Consultation Paper – RDKB Submission

Thank you very much for the opportunity to provide feedback on this very important initiative. In response to the request for submissions on the Province’s Clean BC - Plastics Action Plan Consultation Paper, the RDKB is pleased to provide the following responses to questions identified in Paper:

Section 1 – Bans On Single-Use Packaging

Question 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: Bans on plastic packaging that do not have a viable recycling market would be beneficial to further support waste reduction and diversion. Bans on plastic packaging will reduce the amount of ‘unnecessary’ plastic packaging at the production level rather than the consumer level.

Plastic packaging products recommended as priority for BC to ban are:

- *Foam cups and foam take out containers*
- *Plastic straws, stir sticks, and plastic cotton swabs*
- *Single-use plastic utensils and plates*
- *Biodegradable and Oxo-degradable plastic material*
- *Multi-laminate packaging*

These items listed above are difficult to recycle and have limited viable recycling markets. In addition, the bans should work to phase out materials that cannot be recycled or composted. Instead, initiatives should promote the production of new materials that can be readily recycled or composted and are made from recycled content.

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 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: Bans on the sale, distribution and ultimately production of certain types of packaging is the preferred option as this prevents the material from being created in the first place. Disposal bans can be extremely difficult and impractical to implement or enforce at the local level resulting in varying degrees of effectiveness across the province based on resources available for enforcement.

In addition, implementation of disposal bans requires the existence of alternatives. Further, fines associated with bans are often considered as the “cost of doing business” rather than driving the desired behavioral change of waste reduction. Disposal bans can also encourage the export of waste to other jurisdictions which does not have the desired outcome of waste reduction.

It is imperative that any sale or distribution bans take into consideration the potential impacts of alternatives that may be used to replace the banned items, to avoid unintended consequences.

Question 3 – If a ban was applied, how should exemptions be considered?

Response: There should be no exemptions however it is understood that due to health/safety/hygiene considerations there may be more challenges with finding appropriate alternatives. For this and as long as a verifiable need is shown, provide timelines (reasonable) for meeting ban requirements to allow for an effective transition to alternative materials. Hardship or unwillingness to change from industry or business should not be a rationale for exemptions.

Question 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: Although several BC municipalities are considering or have already introduced bans or restrictions on the use of plastic grocery bags and other single-use plastic items it is felt that the Province is best equipped from the perspective of regulatory authority and for the ease of consistency, to impose bans on single use plastics that may end up in the environment and waste stream. Provincial and Federal level regulations allow large and small businesses to adapt with less disparity that might result from as bans introduced at a local level. Furthermore, the broader reach of provincial and federal programs allows for consistent messaging, common understanding by those affected and facilitates adoption of new programs.

Section 2 – More Recycling Options

Question 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 RDKB is supportive of the Province'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. 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 stir sticks and cutlery, as these items are not suited for collection and processing at

recycling facilities.

Question 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: 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 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: This change will create confusion on the part of the consumer where extensive education programs have directed these materials to Recycle BC programs (curbside collection). Changing to a depot required drop off will not necessary result in additional materials recycled due to perceived or real inconvenience levels. Many will still place these materials in curbside collection programs.

If this is to proceed, it would be essential to maintain or expand the current depot network to ensure adequate access to deposit refund options. There will be public backlash if a refund is not easy to obtain. Further, consideration should be made to the impacts to the bottle depot network and capacity for additional container volumes.

Question 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: This proposal will create simplicity and uniformity for consumers at both time of purchase and during return to depot and as such is supported. Deposit-refunds are an important source of income for many not-for-profit agencies and vulnerable communities and, therefore, a further recommendation would be to review the deposit level for potential increase in the near future.

Question 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 with consideration to negative impacts to existing partnering return depots. Further, cash refunds should be maintained as an option for those that do not have access to alternative systems.

Section 4 – Reducing Plastics Overall

Question 1 – What should BC consider in the development of a national standard on recycled content and any associated targets?

Response: Standards and associated targets should be set at levels that result in increased investment in recycling programs and associated infrastructure. A target that is easily achievable does little to spur investment and innovation, whereas a high target will push stewardship organizations to expand collection options, and create opportunities for investment in recycling infrastructure. Standards and targets that utilize recyclable content generated within Canada and/or North America may incentivize the development of local recycling infrastructure. For example, the implementation of fibre standards that include requirements for material recovered in BC/Canada will encourage investment in local recycling options and minimize shipping materials to overseas markets.

Question 2 – Do you have any comments or suggestions on any related provincial policies or actions?

Response: In amending the Recycling Regulation consider also amending the required collection/capture rate. Currently the 75% recovery requirement is calculated across all of BC, which has resulted in significant portions of rural BC underserved. Collection/Capture rates should be established at a Regional District Level. To offset increased costs for adequately servicing rural areas and achieve economies of scale the Recycling Regulation should also be amended to include materials generated from the Industrial, Commercial and Institutional sector.

Although BC is considered a leader in recycling and Extended Producer Responsibility Programs, more focus on policy and regulations surrounding reduce and reuse is required.

Thank you again for this opportunity to provide feedback and comments on the Clean BC Plastics Action Plan. The RDKB looks forward to continued dialogue and participation in any follow-up engagement opportunities.

Sincerely,

Roly Russell
Chair – Regional District of Kootenay Boundary