



# REGIONAL DISTRICT NORTH OKANAGAN

## MEMBER MUNICIPALITIES:

CITY OF ARMSTRONG

CITY OF ENDERBY

DISTRICT OF COLDSTREAM

VILLAGE OF LUMBY

CITY OF VERNON

TOWNSHIP OF SPALLUMCHEEN

## ELECTORAL AREAS:

"B" – SWAN LAKE

"C" – BX DISTRICT

"D" – LUMBY (RURAL)

"E" – CHERRYVILLE

"F" – ENDERBY (RURAL)

OFFICE OF: COMMUNITY SERVICES

OUR FILE No.: 4900.01.01

September 26, 2019

**VIA EMAIL: [Plastics@gov.bc.ca](mailto:Plastics@gov.bc.ca)**

Ministry of Environment and Climate Change Strategy  
Recycling Regulation Amendments

## **Re: CleanBC Plastics Action Plan**

Thank you for the opportunity to provide feedback on the path forward to reduce plastic pollution in B.C. Please find the submission from Regional District of North Okanagan (RDNO) Staff as follows based on the questions provided in the CleanBC Plastics Action Plan consultation paper:

### **1. Bans on Single-Use Packaging**

**Do you think bans on plastic packaging should be implemented in B.C.? What plastic packaging products are a priority for B.C. to ban?**

*Yes, RDNO Staff supports bans on single use plastics as one approach to reducing plastic pollution and has a bylaw waiting for provincial approval for single-use checkout bags. RDNO Staff supports bans for other single use plastics including takeout containers, utensils, straws, disposable cups, polystyrene foam.*

*RDNO Staff also suggests banning redundant packaging that is primarily used to market items rather than simply contain, protect or identify a product (for example excess packaging around tools and electronics).*

**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)?**

*RDNO Staff favours bans on the "sale of certain types of packaging" as the most effective type of ban for reducing the distribution of these materials. With reduced distribution for these materials resulting from bans from the "sale of certain types of packaging" there would be reduced need for disposal bans.*

*Disposal bans may produce increased barriers to disposal resulting in increased risk of the amount of materials being released as litter into the environment. Many of these materials are also supported by the Recycle BC program which is available for residents who choose to take these materials to a designated depot.*

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

*RDNO Staff suggests exemptions should be considered for health or safety needs where no alternative options are available.*

*Exemptions should be granted at federal or provincial level to ensure compliance and consistency.*

**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 plastic items in their community? What types of bans should be considered?**

*RDNO Staff considers bans for the “sale of certain types of materials” are best suited for implementation at the federal or provincial government level, to ensure consistency, successful enforcement and avoid confusion. Where applicable, disposal bans are best suited for local governments which often oversee waste facilities where they are enforced.*

*In addition to disposal bans, local governments should be given the authority to ban plastics that are seen to be problematic at disposal facilities and in the environment, if no active leadership is taking place at the federal or provincial level.*

*Disposal bans are a last resort and result in additional fees which RDNO Staff does not consider to be an effective diversion tool.*

## **2. More Recycling Options**

**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?**

*RDNO Staff suggests that more emphasis needs to be placed on Reducing and Reusing packaging-like products rather than just adding more products to Recycling Regulation. Recycling is preferable to landfilling materials, however it is an energy intensive process that often results in materials such as plastic being downcycled to a lower grade material that cannot be recycled and eventually results in a waste product.*

*Regulation and Plastic Action Plan resources should support moving towards a circular economy that keeps products and materials in use and assigns more value to products.*

*For including packaging-like products in the Recycling Regulation, RDNO Staff suggests more clarification within the Packaging and Paper Products category. Paper is quite clearly defined while packaging is not and specifics should be described. Recycling Regulation should also specify that both residential and ICI packaging are included.*

*Compostable and biodegradable plastic packaging should be exempt from Recycling Regulation because of the contamination they cause in the recycling streams.*

**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?**

*RDNO Staff supports significantly reducing single-use items. Recycling Regulation would not do this and may actually encourage more consumption of these low value products that consume resources, litter the environment and produce significant garbage. Single-use items are often low value and difficult to recycle products that are often contaminated with food residues.*

*Regulation should require and encourage alternatives to single-use items. In addition to considering bans, this may be done by assigning regulated fees to single-use items that discourage their use and reflect the full costs of the resources they consume and their liability as litter in the environment and waste in landfills. Regulation should encourage the reuse of durable products that replace the use of single-use items.*

*Compostable and biodegradable single-use items should be exempt from Recycling Regulation because of the contamination they cause in recycling streams.*

### **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?**

*RDNO Staff is in favour of the ministry's proposal to include milk and milk substitutes in the beverage container deposit-refund schedule though suggests exemptions for Formulas for Babies, Toddlers and Meal Replacements. This will ensure more clarity for this category which would then apply to all ready to drink beverages.*

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

*A uniform 10 cent deposit-refund is inadequate to increase recovery rates to an acceptable level. Larger containers over 1 litre currently have a 20 cent deposit so a reduced deposit-refund may reduce return rates for containers over 1 litre.*

*Alberta currently has a deposit-refund system with higher deposits than being proposed in BC: 10 cents for all beverage containers less than 1 litre and 25 cents for all beverage containers greater than 1 litre. Alberta's recovery rate is currently 86% which is higher than BC's current recovery rate of 77.4 and its Regulated Requirement of 75%.*

*The substantial amount of beverage containers sold in BC necessitates the need to have much higher return rates to ensure large numbers of these products do not get landfilled or litter our environment. To put things in perspective 1,350,852,403 beverage containers were sold in BC in 2018. If BC were to increase its return rate to match Alberta's 86%, it would result in 189,119,336 containers not being recovered in one year. This is an equivalent to 518,135 containers not being recovered each day.*

*With the very high quantity of beverage containers being sold, RDNO Staff is recommending the ministry make it a 95% recovery rate the Regulated Requirement. Considering a 20 cent deposit on all beverage containers less than one litre and a 30 cent deposit on all beverage containers greater than 1 litre would facilitate movement toward this higher standard. To put into perspective, in 2018 terms, a 95% recovery rate would result in 9,455,967 beverage containers not being recovered which is equivalent to 25,906 containers per day.*

*Also RDNO Staff suggests regular reviews and updates to the bottle deposit-refund amounts and adjusting the deposit rates for inflation.*

*Further, bottle caps (#4 on the Dirty Dozen list of list of litter found on shoreline cleanups - Great Canadian Shoreline Cleanup) needs to be identified as a priority for recovering. Either making it mandatory for caps to be attached to bottles or charging deposits on the caps themselves.*

*Also, if not banned, RDNO Staff suggests single-use hot and cold drink cups should be considered as deposit items.*

**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)?**

*RDNO Staff considers allowing refunds to be electronic and paid in alternative forms as acceptable and in line with current consumer preferences as this is an added layer of customer service. However this in no way should make cash refunds less available or convenient for those who prefer receiving cash refunds.*

#### **4. Reducing Plastics Overall**

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

*RDNO Staff suggests the following considerations in the development of a national standard on recycle content:*

- *Encourage plastic recycling over plastic recovery (such as a fuel).*
- *Establish high standards for percentage of required recycled content that increases market demand for recycled material.*
- *Subsidize the costs of recycled plastic at the cost of virgin plastics through EPR programs by making it significantly more expensive for producers to use virgin plastics compared to recycled plastics.*
- *Ensuring products with recycled content are still recyclable.*

- *Work to eliminate the risks of release of microplastics. For instance recycled plastics are used to produce clothing products which release microplastics in their fibers. Applications of recycled plastic that release substantial microplastics should be eliminated.*
- *Impose standards on designing products that are easier to recycle, again this may be done through EPR programs where producers pay significantly more for products that cannot be recycled or are difficult to recycle.*
- *Support research that is fully funded through EPR programs to devise ways to break plastic into its most basic units to increase the amount of times plastic can actually be recycled with the goal of the material being infinitely recyclable.*

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

*RDNO Staff has the following comments on related provincial policies:*

- *Recycling depot compensation from Extended Producer Responsibility programs requires a comprehensive review to ensure recycling depot owners and their employees are adequately compensated for the services they provide.*
- *Ban oxo-biodegradable plastics.*
- *Robust definitions of regulated products are needed for clarity.*
- *Increase communications between various ministries and levels of government potentially involved in the regulation of plastics (ie. The issue of Agricultural Plastics should be discussed between Ministry of Agriculture and MOE)*

If you have any questions, please contact Darren Murray at darren.murray@rdno.ca 250-550-3784.

Sincerely,



Darren Murray  
Environmental Coordinator, Community Services

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