

September 30, 2019

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

Re: Response to the CleanBC Plastics Action Plan Policy Consultation Paper

Please accept this letter as our formal response to the Plastics Action Plan Policy Consultation Paper released July 25, 2019. After reviewing the consultation paper, we have provided feedback on the proposed amendments to the Recycling Regulation of the Environmental Management Act below on behalf of Rexall Pharmacy Group Ltd.

1) Ban on single use plastic packaging

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

We do not think a ban on plastic packaging should be implemented in British Columbia and do not have any specific products that are a priority to ban.

What types of bans should be considered? Examples include a ban on the sale/use of certain types of packaging or a ban on disposal.

We do not support a ban on plastic packaging but instead support incentives being offered to businesses to produce more environmentally friendly packaging. Any ban on plastic packaging should be complimented with an incentive for industry to transition to a preferred form of packaging.

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

Exemptions should be granted for the following items:

- a) Food safety – Plastic packaging is an integral part of the current food safety system. It is used to ensure that products are not tampered with prior to purchase, to extend a product's shelf life, avoid theft, reduce spillage and limit

cross contamination. In many cases, there currently is not a viable alternative to the plastic packaging that is being used. Removing single use plastic packaging on food products without feasible alternatives would reduce the effectiveness of current safeguards put in place to protect consumers.

- b) **Pharmaceutical safety** – Similar to food safety above, plastic packaging is currently used to ensure that pharmaceutical products are not tampered with prior to purchase, that items are sealed and tamper proof evidence exists, that products have child proof locks or security measures, that medicines are kept in properly segregated quantities (e.g. pill bottles and blister packs) and that tools used to administer the medicines (e.g. syringes) are sanitary prior to use. Removing single use plastic packaging on pharmaceutical related products would impact the current safety measures put in place to protect patients.
- c) **Transportation concerns** – Plastic wrap and other packaging is currently used in the shipping of products. Viable cost-efficient alternatives for plastic transportation packaging, especially plastic wrap, do not currently exist. Banning plastic packaging used in the transportation of goods would immediately increase spillage and damage to products incurred during transport. Current shipping practices would not be feasible, and time and money would be required to perform testing on new product packaging and transportation methods.

Aside from the above exemptions, businesses are currently faced with numerous pieces of legislation that compete with the goal of reducing plastic packaging. For example, effective in 2021, Health Canada has implemented new plain language labelling requirements. As part of these changes, it is expected that the size of current packaging may increase due to additional disclosures required. This change contradicts the environmental initiatives currently in place in Canada. Manufacturers and producers are being told to reduce packaging and the impact on the environment but are having to balance that with increased regulation on the disclosure and product safety surrounding goods. When considering the ban on plastic packaging, all other currently enacted provincial and federal laws should be considered.

Overall our business is open to reducing plastic usage in packaging as long as there is limited or no impact to product stability and performance. For example, in-store plastic bags can be replaced with 100% plant based renewable materials or paper bags. Paper boxes can be replaced with boxes containing 100% recycled paper content. However, this transition requires longer testing to ensure product quality is not affected and also requires our suppliers to invest substantial capital in developing new packaging.

As a result, we are looking for guidance on which way the Ministry would like the business community to proceed. What type of plastic is preferred? Should specific plastics, such as black plastic, be avoided? What type of recycled plastics is there a market for? Which plastics are easier to recycle? What products outside of plastic would be preferred? Will there be incentive

for manufacturers to change their packaging away from plastics? What overall time period would the transition away from plastics occur? When considering the new plastics framework, we believe consultations and information sessions with businesses would be vital to allowing the business community to effectively plan and respond to the revised proposals.

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?

Where possible, bans should be implemented at the federal level. Having different framework at provincial or local level is very difficult for a national entity to manage and it contributes to misaligned or contradictory bans. In addition, implementing independent programs at lower levels will result in duplication complexity and excessive costs for all stakeholders. This would create challenges for national product listings for manufacturers, distributors and retailers and others engaged in trade across different provinces. Having a consistent framework on the national level would allow manufacturers and producers to focus on one set of rules and to develop products that meet those rules and requirements.

2) Expanding producer responsibility for packaging-like products and single-use items

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?

Plastic packaging-like products that should be exempt would be anything that can be reused. For example, plastic containers, totes and bins should be exempt as they can be used on multiple occasions.

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?

The Ministry will need to clearly define the term 'single-use' as this term can be interpreted differently. For example, plastic cutlery may be a single-use item in certain situations, but it may be a re-useable item in other situations.

3) Expanding Recovery and Recycling of Beverage Containers

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

We support adding milk and milk substitutes to the beverage container deposit refund schedule as it would allow for all beverage containers to be included in the program. It would eliminate the need for businesses to have two separate processes based on beverage container type and the requirement to segregate beverages by type.

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

We support having a uniform deposit refund for all beverage containers as it would simplify the deposit refund processes for business, avoid any ambiguity on what deposit rate should be applied to a container, make the deposit program easier for the consumer to understand and hopefully increase the rate that beverage containers are recycled.

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, etc.)

These programs need to be designed to be easy for businesses to manage and the flow of funds should be done electronically as much as possible to eliminate unnecessary added cash transactions which can be costly for businesses.

4) Reducing Plastics Overall

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

In developing a national standard on recycled content, British Columbia should consider the impact of such a change on the Canadian economy. More specifically, will the changes put Canada at a competitive disadvantage when compared to other competing markets? Will the changes force manufacturers and producers to move their facilities elsewhere or to avoid the Canadian market all together? This could create sourcing issues for other Canadian companies and could in turn have a significant impact on the quantity or quality of Canadian jobs.

The provinces need to work together with the Federal government and industry to develop national standards that are based on global best practices. This could include minimum recycled content in certain products, banning certain plastics that are not easily or economically recyclable as well as mixing of some plastics that make them non-recyclable. Standards need to be at a National level and should align to international standards where possible especially EU and US. Incentives should be considered for the innovation of use cases and processes to reduce and eliminate use of plastics in an environmentally and economically sustainable way.

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

No additional comments at this time.

Sincerely,
Rexall Pharmacy Group Ltd.