

September 30, 2019

Ministry of Environment and Climate Change Strategy
P.O. Box 9360, Stn Prov Govt
Victoria, BC V8W 9M2

Via email: Plastics@gov.bc.ca

Subject: Plastics Action Plan – Policy Consultation Paper

Dear Sir/Madam:

S. C. Johnson & Son, Inc. (SC Johnson) is pleased to submit the following comments to the British Columbia Ministry of Environment and Climate Change Strategy on the “Plastics Action Plan” policy consultation paper. We applaud the Ministry’s efforts to reduce plastic waste and seek to be a partner in helping BC achieve its goal of being a place “where plastic pollution becomes a thing of the past.” We also hope our views will be helpful as you develop regulatory proposals aimed at reducing plastic pollution and encouraging less plastic use overall.

About SC Johnson

SC Johnson is a family company dedicated to innovative, high-quality products, excellence in the workplace and a long-term commitment to the environment and the communities in which it operates. Based in the USA, the company is one of the world's leading manufacturers of household cleaning products and products for home storage, air care, pest control and shoe care, as well as professional products. It markets such well-known brands as GLADE®, KIWI®, OFF!®, PLEDGE®, RAID®, SCRUBBING BUBBLES®, SHOUT®, WINDEX® and ZIPLOC® in the U.S. and beyond, with brands marketed outside the U.S. including AUTAN®, BAYGON®, BRISE®, KABIKILLER®, KLEAR®, MR MUSCLE® and RIDSECT®. The 133-year-old company, which generates \$10 billion in sales, employs approximately 13,000 people globally and sells products in virtually every country around the world.

SC Johnson Canada was established in 1920. We have manufacturing operations in Varennes, QC and Brantford, ON where we make a number of iconic SC Johnson brands that are enjoyed by families throughout Canada and around the world. You can learn more about the company at www.scjohnson.com.

SC Johnson strongly believes the private sector has an important role to play in reducing plastic pollution and encouraging more material recovery and recycling. As a brand owner, we are very familiar with producer responsibility programs in BC and other Canadian provinces where we contribute financially to the end-of-life management of plastic products and packaging that we place onto the market. Such product stewardship programs are a vital component of the fight to reduce plastic pollution, but we believe more can and must be done to protect the environment from plastic pollution. According to the Canadian Council of Ministers of the Environment’s (CCME) Phase-1 action plan for getting Canada to zero-plastic waste, nearly 90 percent of Canada’s plastic waste is not recycled or recovered, representing an estimated economic loss of \$7.8 billion. This challenge presents a significant opportunity to shape meaningful policies that will advance plastic waste reduction – bringing together governments, industry, stakeholders, civil society, and the public to develop effective solutions. SC Johnson has deep roots in Canada – our Brantford-based subsidiary will celebrate its 100th anniversary next year – and we take our corporate responsibility to help protect the environment for all Canadians to enjoy very seriously. To that end, we welcome the opportunity to engage with the Ministry in the effort to keep plastics in the economy and out of the environment.

Boosting Plastic Recycling and Reuse

Around the world, SC Johnson has been working for more than a decade to reduce plastic waste and pollution. Last year we signed the New Plastics Economy Global Commitment to further reduce our plastic footprint, and in January of this year we became a Global Partner of the Ellen MacArthur Foundation, whose mission is to accelerate the transition to a circular economy – including by bringing together key industry stakeholders to create a circular economy for plastics, starting with packaging. Our commitment as a Global Partner encompasses several significant voluntary and proactive steps that we believe are very consistent with the goals and objectives of the Plastics Action Plan, for example:

- **100% of SC Johnson plastic packaging will be recyclable, reusable or compostable by 2025.** Currently, 94% of the company's plastic packaging is designed to be recyclable, reusable or compostable – *up from 90% in fiscal year 2017/18.*
- **Triple the amount of post-consumer recycled (PCR) plastic content in SC Johnson packaging by 2025.** We will continue to use more and more PCR plastic in our packaging – in North America and Europe, we will increase the percentage of PCR plastic we use in our plastic bottles from 20% today to 40% by 2025.
- **Expand the number of concentrated refill options for SC Johnson products by 2025.** We believe reusability presents a significant opportunity to innovate and drive transformative change. Since 2011, SC Johnson has been making concentrated liquid refills for its Home Cleaning trigger bottle products in the U.S. Each trigger bottle is designed to deliver 10,000 sprays so it can be refilled and reused an average of 13 times, every time avoiding a single-use alternative. The company will continue to expand its variety of concentrated refill options, enabling consumers to reuse packaging and reduce waste, including having launched mini-concentrated refills at retail in Canada this summer in the WINDEX®, SCRUBBING BUBBLES®, and FANTASTIK® product lines. Moreover, each concentrated refill bottle is made with 25% PCR plastic content.
- **Continue to remove excess plastics wherever possible.** SC Johnson has been relentlessly focused on designing unnecessary packaging out of its products. From 2011 to 2017, the company has removed 9.5 million kilograms of materials from its packaging. *During fiscal year 2018/19, SC Johnson removed more than 1.7 million kilograms of plastic from primary packaging.*
- **Champion curbside recycling of plastic film.** SC Johnson will continue its effort to make curbside recycling of flexible plastic film such as Ziploc® brand bags a reality. *In fact, we recently announced the launch of the State of New Jersey's first pilot program for curbside plastic film recycling through a partnership with the Borough of Bradley Beach.* Through a year-long pilot program slated to run from November 2019 to November 2020, Bradley Beach residents will be able to conveniently recycle their plastic bags, plastic film and plastic wrap as part of the community's curbside recycling program. To facilitate this initiative, SC Johnson is providing the borough with funding for a collection vehicle, curbside bins and community engagement materials to raise awareness.

SC Johnson and Plastic Bank

Canada clearly has established itself as a global leader in the fight to reduce the environmental crisis caused by ocean plastic. From the Ocean Plastics Charter championed by Prime Minister Trudeau at the 2018 G7 leaders' summit and the Canada-wide zero-plastic waste strategy action plan being led by the CCME, to successful provincial producer responsibility schemes in British Columbia and elsewhere, Canada at many levels of government has demonstrated a strong commitment – which we share – to plastics stewardship on land and in the oceans.

That's why we were very pleased to team up with the Vancouver-based organization *Plastic Bank* to open recycling centers in Indonesia to help keep plastic out of the ocean, while at the same time providing income to local families. According to a 2015 report by Ocean Conservancy and the McKinsey Center for Business and Environment, five Asian countries – China, Indonesia, the Philippines, Vietnam and Thailand – accounted for more than 55 percent of the plastic waste leaking into the ocean. Raising collection rates to an average of approximately 80 percent across those five countries would reduce plastic waste leakage into the ocean by nearly 23 percent.

Under the *Plastic Bank* model, local waste collectors can bring the plastic they collect to any center where they can exchange it for digital tokens. Using innovative Blockchain technology, they can then use the tokens to buy needed goods and services – reducing the risk of loss or theft. Our company was an early supporter of *Plastic Bank's* unique model that tackles ocean-bound plastic at its source, while also helping create opportunities for people living in poverty. In the last 12 months, we've opened nine recycling centers in Indonesia in partnership with Plastic Bank. With nearly 28 million Indonesians living below the poverty line, there's much more work to be done.

Below are our thoughts on a few of the policy approaches the Ministry is considering:

Bans on single-use packaging (Policy Approach #1)

SC Johnson agrees that some product bans or restrictions can be an effective policy tool to prevent plastic waste from occurring in the first place and help reduce the use of plastics that too often are found in the environment and littered in our communities. Plastic straw bans, for example, while not solving the overall waste problem, serve a useful purpose by bringing the issue to the forefront of people's minds. That, in turn, is important to companies like ours that want to provide product-based solutions to the challenge of reducing plastic waste, but also need consumers to recognize the importance of the issue when making purchasing decisions.

However, the term "single-use packaging" is not defined in the action plan. Examples of common "nuisance" plastics are given in the context of action taken by the European Union, such as plastic cotton swabs, cutlery, plates, straws, drink stirrers, and balloon sticks, as well as steps taken by a few U.S. states to ban plastic retail shopping bags and polystyrene foam. We believe the definition will be critical to an effective limit or restriction on single-use plastic products and/or packaging, as it will drive understanding and agreement among interested stakeholders toward a common goal – the eventual elimination of unnecessary and problematic plastic packaging and a greater shift to reuse models that reduce the need for single-use packaging.

When considering the scope of single-use plastics or packaging, SC Johnson strongly encourages the Ministry to craft a definition consistent with the principles of the New Plastics Economy Global Commitment led by the Ellen MacArthur Foundation – i.e., single-use plastics do not include products or packaging designed to be reusable, recyclable, or compostable. We encourage alignment with New Plastics Economy Global Commitment because the Ellen MacArthur Foundation has been so successful in bringing together more than 350 signatories across leading companies, cities, philanthropists, governments, academics, NGOs, and citizens to unite around a common vision of a circular economy for plastics and a common understanding of what constitutes single-use plastics – and what does not.

Further, we strongly believe that regulatory action should not target plastic products that play an essential role in food storage and preservation, and reducing food waste. Preventing food waste is a serious challenge. In January 2019, Second Harvest in Toronto, working with Value Chain Management International, released an eye-opening study about food loss and waste in Canada entitled, *The Avoidable Crisis of Food Waste*. While the study showed that a significant amount of food waste occurs within the food industry – across several elements of the food value chain like production, processing, manufacturing, distribution and retail – households still accounted for 5 million tons of food waste or roughly 14% of the total amount of food waste generated. In the United States, the U.S. Environmental Protection Agency (EPA) estimates that more food – over 75 billion pounds – reaches landfills and combustion facilities than any other material found in everyday trash, constituting 22% of discarded municipal solid waste.

There's also an important environmental benefit to be realized by reducing food loss and waste, as food that winds up in landfills releases methane gas, a greenhouse gas that contributes to climate change. As *Love Food, Hate Waste Canada* explains on its website, there's an environmental toll from food waste in terms of the wasted resources that are used to grow, produce, and distribute food to consumers – all of which contributes to Canada's greenhouse gas emissions. LFHWC estimates that reducing just one ton of household food waste is equivalent to taking one car off the road each year.

Reusable, recyclable plastic products like Ziploc® brand bags and containers offer consumers viable and affordable everyday solutions to reducing and preventing food loss and waste. They are designed to be reused multiple times and can be recycled in communities with recycling programs that accept plastic film and containers. If curbside recycling is not an option, consumers often can take their clean and dry bags to retail stores that participate in plastic film take-back programs.

When considering the scope of single-use plastic products, we encourage the Ministry to consider certain criteria that would clearly deem a product as single-use, such as:

- Usage pattern – This would include items not designed for reuse and items typically used by a consumer for one-off use prior to disposal.
- Usage period – This would cover items whose consumption often occurs directly after purchase or items normally intended to be used within a short period of time, often outside the home.
- Principal locality – Potential regulation should focus on items typically used outside the home or on-the-go in a clear single-use format.

More Recycling Options (Policy Approach #3)

While we understand the reasoning behind the Ministry’s desire to expand the scope of materials covered by BC’s province-wide extended producer responsibility program, we encourage the Ministry to conduct targeted consultation to specify how “packaging-like” products and “single use” items will be defined as distinct product categories so as to ensure fair distribution of costs and obligations for all affected producers. We are especially concerned with the proposal to include re-sealable storage bags and containers within the definition of packaging-like products. Re-sealable bags, like other more durable storage containers, are regularly re-used by consumers and for longer periods of time.

Reducing Plastics Overall (Policy Approach #4)

SC Johnson supports the goal of promoting effective ways to prevent plastic waste in the first place and ensuring recycled plastic is re-used effectively, such as through standards that require a minimum content of recycled plastic in new packaging or end-use products. Such a design-for-recycling approach will help stimulate demand for recycled plastic materials and keep more plastic in the economy, rather than going to landfill – thereby contributing to a closed loop model where these materials are not lost to the economy, but rather kept in productive cycles of use and reuse.

To that end, we encourage the Ministry to consider incentives for sustainable, eco-friendly packaging design innovations that will lead to reduced plastic use by incorporating reuse and recycling. Further, SC Johnson can support a reasonable minimum post-consumer recycled (PCR) content requirement for certain plastic products, where it makes sense to and where it is clearly demonstrated that markets for recycled plastic content actually exist – for example, HDPE or PET trigger spray bottles. This would help drive market demand for recycled plastic and reduce demand/use of virgin materials or feedstocks.

We also strongly support establishing credits toward reduced stewardship fees in British Columbia’s province-wide extended producer responsibility program for placing innovative, sustainable packaging and/or product designs on the market, for example:

- Use of concentrated refills in bottles that also incorporate PCR content. A new line of SC Johnson concentrates began rolling out in Canada and the U.S. last May in the Scrubbing Bubbles®, Windex®, and fantastik® product lines. By using a concentrate bottle, consumers use nearly 80% less plastic.
- HDPE and PET bottles made with a high percentage of PCR content, including bottles made from 100% recycled ocean plastic. Earlier this year, SC Johnson launched the first-ever industry product that uses 100% recycled ocean-bound plastic in a major home cleaning brand, Windex®. The bottle is made from plastic waste collected

within 30 miles of an ocean or waterway in countries that lack effective, formal waste collection systems. Also, our Windex® bottles have been made with 100% PCR plastic in North America since 2015.

- Boxboard cartons made with 100 percent PCR content. For example, our Ziploc® line of reusable, resealable plastic storage bags are packaged in cartons made with 100% PCR content.

Additional Issues Not Addressed in the Action Plan

- Infrastructure Development: SC Johnson supports and encourages government investments to improve, enhance, and expand solid waste management infrastructure. Investments can include direct investments, grants, or loans that incentivize the expansion of materials accepted or fund recycling innovations. New investments to modernize infrastructure will help meet the province's materials management needs and foster a more resilient solid waste system capable of withstanding pressures from disruptions like China's National Sword policy that has significantly affected many countries' ability to export plastic waste to China.
- Compostability: SC Johnson supports the goal of providing clear rules for compostable products to ensure they do not go to landfill. We can also support a requirement for products/packaging marketed as compostable to be certified using recognized and accepted standards, such as the U.S. Composting Council and Biodegradable Products Institute, or an applicable ASTM standard (D6400 or D6868).
- In-Store "Take Back" Programs: SC Johnson is committed to making it easier for consumers to recycle their Ziploc® brand plastic storage bags, going beyond curbside recycling. In the U.S., wording on the outer carton of Ziploc® bags encourages consumers to take clean, dry bags to participating retailers who operate in-store "take-back" programs that collect plastic bags and film for eventual recycling into other usable materials, often durable fencing and decking materials. We are actively exploring the feasibility of establishing a similar take-back program with a trusted retail partner in Canada and encourage consideration of a future credit against stewardship fees for HDPE and LDPE bags that are collected via in-store take-back programs and thus diverted from going to traditional landfills. We would be pleased to work with the Ministry and Recycle BC to structure such a credit in an effective and meaningful way.
- Consumer Education: SC Johnson believes that to be truly effective, any government-led effort to reduce plastic waste must include measures to raise awareness of recycling and encourage more consumers to dispose of their plastic products and packaging in a responsible manner. In that sense, we believe tackling the challenge of plastic pollution in the environment is a shared responsibility – it should not be left solely to producers and brand owners to drive waste prevention and diversion of recyclable materials from landfills. To that end, we support public awareness campaigns and other educational tools and resources, including robust use of social media channels, aimed at informing consumers about the importance of recycling and the environmental benefits of recycled plastics and sustainably-designed products – as well as communication recycling "know-how" to ensure that BC residents are recycling correctly and effectively.

SC Johnson appreciates the opportunity to participate in this public consultation and respectfully submits these comments for the Ministry's consideration. With the increased spotlight on the global plastic waste crisis, we believe manufacturers and brand owners like SC Johnson have an important role to play in developing effective solutions to plastic pollution in the environment – and we're pleased to share our efforts and insights with the BC Government. **We look forward to being an active, engaged partner in this conversation going forward and would be pleased to meet with Ministry staff in person.**

In the meantime, we invite you to read SC Johnson's 2018/2019 sustainability report, "Turning the Tide: Addressing the Plastic Waste Crisis," in which we detail our company's steps to accelerate progress toward reducing plastic waste, as well as other sustainability milestones – including achieving ahead of schedule our 2021 commitment of sending zero manufacturing waste to landfill and continuing to get one-third of the company's energy use from renewable sources. You can find the report online at SCJohnson.com/report.

If you have any questions about issues presented in these comments, please do not hesitate to contact me at (202) 331-1186 or by email at cppearce@scj.com.

Sincerely,

A handwritten signature in black ink that reads "Christopher P. Pearce". The signature is written in a cursive style with a long horizontal flourish at the end.

Christopher P. Pearce
Director – Government Relations