September 26, 2019

Clean BC Plastics Action Plan -Consultation Feedback from Zero Waste BC

Thank you for the opportunity to provide feedback on these positive actions. Please find our suggestions below.

1. Bans on single-use packaging

a) Great idea to both ban the release or use of specific items as well as their entry to landfills or disposal systems.

b) Follow the EU lead on including plastic cotton swabs, cutlery, plates, straws, drink stirrers and sticks for balloons), as well as cups, food and beverage containers made of polystyrene foam and all products made from oxo-degradable plastics. However, watch for other items made of plastic that can slip in if not "oxo-degradable" plastic. It may be better to include items made of all plastics at this time. In terms of bioplastics, keep them out of the production and waste streams at this time until clear standards and labelling can be developed. Once that is done, work with EPR programs to develop a collection stream for them that will not contaminate other materials streams but only if an analysis shows these to be significantly better than plastics and other available naturally-sourced materials.

c) Design policy so that there can be a substantial **reduction** in single use items made from all materials first before moving to replacement with better and renewable materials. Note that even a renewable material can still have a significant environmental footprint so work towards reusable items made of easy to reuse and recycle (at the end of the product's life), renewable materials such as glass or metal straws, cloth bags, refillable glass bottles, wooden or metal cutlery, etc. Work to phase out unnecessary items like drink stirrers, balloon sticks and most straws. Include a ban on magazines, reports, directories and newspapers being encased in plastic wrap.

d) Work to end the use of Expanded polystyrene foam in packaging (and for marine uses like docks).

e) Work with credible sources like the associations for Speech Language Pathologists, Dietitians and Occupational Therapists to determine the scope and prevalence of need for medically necessary straws.

f) Work to phase out types of materials that cannot be recycled or composted. The push towards multilaminate plastics are a significant problem and collecting them to burn as fuel wastes the embodied energy of the materials and releases GHGs and encourages further production of these materials.

g) Conduct research to see what other products are problematic (such as stickers on produce that contaminate compost) and can be eliminated or replaced by better systems.

h) Consider the full system impact of materials. One argument for plastics is that they are lighter for transport and thus save greenhouse gases. Another is that they may preserve food longer (though this claim should be independently studied). However, from a broader system-wide perspective, it may be better to refill pop bottles locally and drink local water instead of shipping it in from another country, for beverages, for example. With regard to food waste, looking at how some food producers then will waste a large amount of the production at the farm level for produce that does not fit nicely into the containers, leads one to think that a push for unpackaged food, grown locally and eaten seasonally would have more beneficial impact than allowing a global food system to produce a lot of unrecyclable and unrecycled packaging with concurrent impacts related to huge amounts of pre-consumer food waste, habitat loss, soil nutrient loss, loss of forest when converted to agricultural land, farm run off, etc. Another argument is that single use items are needed for

sanitation or food safety concerns. While some of these uses may be legitimate, many are related to a very low risk associated should the single use items not be used versus the much greater health risk associated with runaway climate change and other environmental impacts.

i) In addition to bans, consider supporting the kinds of activities that are desired such as unpackaged food in farmers markets, zero waste stores, pop refilling centers, an increase in refillable beer bottles and an expansion into the wine sector, ability to buy loose (unpackaged) items like nails so that one can purchase exactly what is needed, customers bringing their own refillable containers, etc.
j) When considering disposal bans, ensure plastics are not burned elsewhere so include production of alternative fuel and cement kilns and other locations that are burning waste as forbidden methods of disposal.
k) Exemptions to bans should be considered when there is clear, unbiased (as in independent, non-industry funded research) evidence that the ban will be problematic for individuals with unique health needs. Hardship or unwillingness to change for industry or businesses should not be a rationale for exemptions.
l) Key bans should be placed as soon as possible by the provincial government. Once the federal government puts in place their changes, efforts should be made to harmonize BC's rules with theirs but only if they are stronger (a race to the top). Local governments should be allowed to enact their own bans. For the sake of the environment, please amend the *Community Charter* so that local governments can enact bylaws to protect the environment. This is needed now more than ever with the climate emergency and could also help with problematic products that may be unique to some communities. For example, many communities work on invasive species while stores in their communities still sell the plants they are trying to curb. Most communities have climate plans in place while stores sell outdoor fireplaces and other fossil fuel based systems of heating the outdoors.

2. More Recycling Options

a) Regulate the missing packaging and printed paper (ICI) under the Recycling Regulation
b) Ban or work to add additional penalties for non-recyclable materials so they are phased out by producers using tools like differential fees or a poor material choice surtax.
c) Ensure the programs are meeting the intention of the Recycling Regulation -not just collection but actually reducing and reusing products.
d) Set escalating targets for collection or products by sub-category and consider financial penalties for uncollected products, verify this in multiple ways including industry funded waste audits in multiple jurisdictions.
e) Set targets for public awareness levels of their ability to return regulated products that increase over time and either require programs to improve it by spending a certain amount of money on marketing or impose an equivalent fine and have the province do it.
f) Include packaging-like products that are plastic such as freezer/sandwich bags, wrapping paper and moving boxes but look at the product: its lifespan and material. Products designed to be reused and that will last a long time such as a sturdy Rubbermaid/Tupperware product should be encouraged over a very thin Ziploc-type version of the same container that will last only a few uses. Products that come in glass canning jars which are from a renewable material and are designed to be used multiple times should be encouraged with incentives, not penalized. Even better if standard sizes were used for BC-made jams, sauces, etc. and a program set up to clean and redistribute them to manufacturers like the BC Beer bottle program. The same goes for companies that rent out moving boxes that can last multiple times versus those that will not. Set up clear standards for what

qualifies similar to what some jurisdictions have done when banning plastic bags to avoid situations like slightly thicker plastic bags being called reusable.

g) When considering plastics as a whole, also consider adding non-electric plastic toys, decorations and novelty items, safety equipment like helmets and car seats, plastic outdoor furniture, gardening equipment, construction waste, agricultural plastics, textiles, fishing gear, marine vessels, poorly designed plastic rafts (e.g. Explorer 200s) and cigarettes (often including plastic filters) to the Recycling Regulation. Look for other items that though considered reusable, are so poorly made that they are virtually single use.
h) For the oil container program, require all retailers of oil containers (marine and auto) also to collect the containers. There are numerous challenges to find drop off locations for these containers and when I was kayaking the north central coast, these were the third most common item on beaches after fishing gear and items lost from containers.

3. Expanding Plastic Bottle and Beverage Container Returns

a) The move to add milk and other beverages into the container deposit-refund schedule is a great idea long advocated for by zero waste adherents such as Ann Johnston and Helen Spiegelman. It will remove the confusion surrounding this and is important as this product range expands with a suite of nut milks. Exempt producers that already charge more and have a direct-to-producer return system like Avalon Dairy and others who charge $1 for each of their own branded milk bottles. Incentivize others to do this as it promotes reuse and local consumption of product (along with lower GHGs).
b) Ten cents was the amount proposed by the ministry in 2011, back when pennies were still circulating. Given the number of beer cans I have personally collected during numerous Pitch in and Lake clean up days in a community where many earn a minimum wage, I would advocate for a twenty cent amount for all. Studies on incentives show that they must retain their power so reducing the deposit on many of the larger containers is problematic. The commitment to review the impact in two years' time is a good one.
c) The suggestion to allow electronic payment sounds good but needs to be analyzed to ensure that this does not destabilize the existing bottle depot network, nor allow for new kinds of ways to game the system.
d) Deposits that are not returned should be kept in a fund outside of the beverage programs (possibly funding awareness campaigns for EPR programs and the system in general) so that there is not a perverse incentive to keep return rates low. Use of funds in this way also means that if awareness is high, there is less of a need for the education uses and more of the fund will be returned as deposits.
e) Design the system to support the refilling of containers such as growlers, the Beer Bottle program or the Pop Shoppes that BC used to have, both from a reuse over recycling and from a GHG reduction perspective.
f) Set up the system to make it easier to recycle beverage containers by banning container sleeves made of different material than the bottle, ensure only one kind of plastic and require container tops and tabs to remain attached to the container once open.

4. Reducing Plastics Overall

a) Overall, develop a zero waste strategy for BC to ensure a comprehensive material throughput and GHG reduction plan and to avoid unintended consequences of increasing environmental impacts through switching to other materials instead of actual material reductions. See details in the BC Intermunicipal Working Group on Waste's 2017 Discussion Paper.

b) Phase out all subsidies to fossil fuels and fossil fuel infrastructure (both direct and indirect).
c) Developing national standard content performance standards is a great idea. Work needs to be done to develop clear standards for each type of plastic, to keep the materials separate, to clearly label the type of plastic and to develop a system that does not foster the proliferation or down-cycling of more plastic but keeps the plastic in circulation for its original use as long as possible. If a national standard is taking too long to develop, consider a BC only standard in the interim to lead the way.
d) Involve the plastics industry in these discussions for their technical knowledge but ensure that the playing field does not become tilted towards industry at the expense of the environment and society.
e) Sustainable procurement policies should be pursued for the federal and provincial governments. The province should develop model bylaws and policies for municipalities, non-profits, etc. as well as access to a research library that provides background information, tools and analyses to aid purchasing decisions. Encourage purchasing collectives to increase capacity and impact.
f) Require the producers to fund marine clean ups to a degree proportional to the amount of their product collected.
g) Consider policies that keep products in use longer such as Right to Repair, requirements to publish repair manuals online, requirements to provide repair service, requirements to provide parts or plans for parts so that a repairer can make their own, mandatory five or ten year warranties, requirements for producers to actually repair returned items or use them for parts instead of destroying them and funding repair cafes. Make EPR programs really consider reduce and reuse in their program plans or add a fee to the programs to fund a provincial system.
h) Consider banning giveaway products that produce waste. This could be free samples in tiny containers or plastic wrap, small toys with fast food meals, schwag at conferences or events, or little bottles of liquor attached to bigger ones. These products are often wasted as the consumer usually gets them without consent. Exempt systems such as sampling food in a grocery store or farmers market where the waste can be minimized and the consumers are asking for the item from a person.
i) Work on consumer education to help consumers understand the complete impact of their purchasing decisions. Start in the schools and educate on quality over quantity, that cheap can be more expensive in the long haul and systems to share infrequently used or expensive items. Inform consumers of their rights. Work in schools to develop literacy of why people consume and how to avoid consumerism as a habit or addiction. Focus on determining values and paths to happiness over wealth. Develop curriculum based on the Living Planet Index or ecofootprint concepts and ensure students understand food systems, nutrient cycles, resource capacity, where their own food comes from, where their water comes from, where their waste goes and what impacts their choices make on all systems.
j) Ban advertising to kids under 18.
k) Develop a GHG reduction plan based on the “GHG by system” measurement. When looking at GHGs by system instead of sector, the importance of reducing food waste and product consumption is apparent. Too often the product/material component is overlooked. Address this and push for better GHG accounting systems to incorporate the full impact of BC-based demand for products and food instead of ignoring that impact.
l) Push for the federal government to incorporate many of the suggestions above in a national program and in trade agreements.
m) Start to consider that when reduce/reuse/recycle options are exhausted that landfilling of existing plastic (over waste to energy) is a form of carbon sequestration. The primary goal should be **reduce**

but the use of existing plastic for energy should be carefully weighed against the fact that it is a fossil fuel and that we have lost the privilege of time to add more carbon to the atmosphere while getting our systems in order. Do not pursue waste to energy systems for mixed waste or plastics.