

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

Re: Clean BC Plastic Action Plan Submission

Congratulations to the Plastics Action team. the paper you have prepared is outstanding.

Introduction... who we are and what we do

My name is Phil Ragan from EcoSafe Zero Waste and some of you may recall meeting informally after your presentation at the CWMA conference at the Black Bear last year. At that time we talked a little about advances in the industry and zero waste solutions and you indicated that we would have the opportunity to participate in the next phase of your project which we are pleased to do with this submission.

EcoSafe is a Surrey based company; we are one of the top three suppliers of certified compostable can liners in North America. And while our EcoSafe~6400 Compostable Liners are well known, our reputation is as a Zero Waste advocate and developer of innovative industry leading “collection and recycling solutions” for the Residential, Commercial, Institutional and Industrial sectors. Our programs are unique in that the primary focus is on supporting and overcoming the challenges of “waste-generators” and “Compost and Recycling Processors” in their pursuit of maximum diversion with near “0” tolerance for contamination. “EcoSafe supports the Zero Waste Canada, Zero Waste Hierarchy 7.0 <https://zerowastecanada.ca/zero-waste-hierarchy/>



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By contrast and unlike BC EPR system, most waste management programs in North America are driven by waste haulers using systems that evolved from “garbage collection” and while they may have served society well when everything was landfilled, they have not risen to the challenge of meeting the needs for source separation and collection of recyclables and particularly organics, as valuable resources without contamination. In todays world all too often the Hauler responds to an RFP and is granted a Contract while the Processors are forced to compete with one another for the feedstocks. An impossible circumstance that drives the process to the lowest common denominator and leaves the Processor to deal with the costs and the mess.

Critical to the success of the EcoSafe Zero Waste solutions is the roles of the Hauler and the Processor (recycling and composter) are reversed. The processor sets the Standards for what materials they can and cannot process and the levels of visible contamination and based on their standards have the discretion to accept, reject or charge processing fees for unacceptable loads. In an ideal world, rejected loads that arrive at the Landfill are charged punitive fees that act as a deterrent and incentive for haulers to work with their customers. Using our innovative zero waste solutions EcoSafe, works to educate the haulers customers, allowing them to divert contamination free organic waste and recyclables from landfill using high-quality products purchased from our distribution partners.

EcoSafe solutions is collaborative process...

EcoSafe often acts as a catalyst in serving our customers in a collaborative process that supports State, Provincial and local regulators, composters and recyclers, haulers and the upstream supply chain (local distributors). In an ideal world, senior governments set the regulations that are then adapted at the regional and local level based on the available infrastructure. Increasing the Washington State approach to regulation is being supported, leaving supply chain stakeholder to develop innovative solutions to areas that may be viewed as exemptions and once legislated are near impossible to reverse.

<http://lawfilesexternal.wa.gov/biennium/2019-20/Pdf/Bills/House%20Bills/1569.pdf>

Our Mission is to design and manufacture products and innovative solutions that help waste generators maximize organic waste and recyclable diversion from landfill.” At no cost EcoSafe offers to technology-based solutions and collateral that includes customizable graphics-based signage, bin labels, posters, announcements, letters to residents and employees and where appropriate supporting compostable products to replace ordinary single use plastics in support of the emerging circular economy.

The following are responses and comments to specifics in the CleanBC document.

PROPOSED AMENDMENTS TO THE RECYCLING REGULATION

Add `packaging-like products’ and `single-use items’ as obligated products to the Recycling Regulation to be recovered and recycled by producers.

Add all single-use beverage containers to the deposit-refund system.

Amend the refundable deposit amount to 10 cents for all beverage containers.

Allow electronic refund options for beverage containers in addition to cash.

We support these proposed amendments and further suggest that they be further segment into those pertaining to the Food Service Sector and general merchandise packaging.

<p>1 BANS ON SINGLE-USE PACKAGING</p> <p><i>Determining which types of plastic packaging to phase out altogether, as well as any necessary exemptions, such as those for health, safety and accessibility to keep products available for the people that need them.</i></p>	<p>Generally speaking, we do not favour entrenching exemptions in legislation as they tend to inhibit innovation and encourage lobbying by industry group. One only has to view the recent action of the CPIA to understand... that corporate bottom line issue trump benefits to the environment.</p>
<p>2 DRAMATICALLY REDUCE SINGLE-USE PLASTIC IN LANDFILLS & WATERWAYS</p> <p><i>Requiring producers to take responsibility for more plastic products, ensuring more single-use items like sandwich bags, straws and cutlery get recycled.</i></p>	<p>We favour the Washington State legislation that set the parameters and regulations and leaves it to the competitive market to find innovative solutions and alternative methods to gain their competitive advantage.</p> <p>http://lawfilesexternal.wa.gov/biennium/2019-20/Pdf/Bills/House%20Bills/1569.pdf</p>
<p>3 PLASTIC BOTTLE AND BEVERAGE CONTAINER RETURNS</p> <p>PLASTIC BOTTLE AND BEVERAGE</p> <p><i>Expanding the deposit-refund system to cover all beverage containers — including milk and milk-substitutes — with a 10-cent refundable deposit, keeping millions more containers out of landfills and waterways.</i></p>	<p>Absolutely</p>
<p>4 REDUCING PLASTICS OVERALL</p> <p><i>Supporting effective ways to prevent plastic waste in the first place and ensuring recycled plastic is re-used effectively.</i></p>	
<p>Do you have comments or suggestions regarding the ministry's proposal to include packaging-like products in the Recycling Regulation?</p>	<p>Generally speaking, we do not favour entrenching exemptions in legislation as they tend to inhibit innovation and encourage lobbying by industry group. One only has to view the recent action of the CPIA to understand... that corporate bottom line issue trump benefits to the environment.</p>

<p>Are there any packaging-like products you believe should be exempt from the Recycling Regulation? » 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?</p>	
<p>Other Resources we would recommend</p>	<p>The compost Manufacturers Alliance. A NA industry association. Membership is free for composters. The provide testing protocols for the testing of “compostables” in four types of composting systems... Static Piles, Aeriated Static pile and In-vessel. The program is used by more than 80 jurisdictions as the source for establishing nationally accepted list of “YES” and “NO” items. www.composterapproved.com</p>
	<p>LEED – Green Business Council certification program called TRUE Zero Waste www.usgbc.org</p>

Respectfully submitted,

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