



City of Richmond

Report to Committee

To: General Purposes Committee **Date:** August 8, 2019
From: Suzanne Bycraft **File:** 10-6370-01/2019-Vol
 Manager, Fleet and Environmental Programs 01
Re: **CleanBC Plastics Action Plan - Policy Consultation Paper**

Staff Recommendation

That the City of Richmond response to the *CleanBC Plastics Action Plan – Policy Consultation Paper*, as outlined in the staff report dated August 8, 2019 from the Manager, Fleet and Environmental Programs, be approved and forwarded to the B.C. Ministry of Environment and Climate Change Strategy.

Suzanne Bycraft
 Manager, Fleet and Environmental Programs
 (604-233-3338)

Att. 2

REPORT CONCURRENCE		
ROUTED TO:	CONCURRENCE	CONCURRENCE OF GENERAL MANAGER
Sustainability	<input checked="" type="checkbox"/>	
REVIEWED BY STAFF REPORT / AGENDA REVIEW SUBCOMMITTEE	INITIALS: 	APPROVED BY CAO

Staff Report

Origin

On July 25, 2019, the B.C. Ministry of Environment and Climate Change Strategy (the “Ministry”) launched consultation on a plan to reduce plastic waste through the *CleanBC Plastics Action Plan – Policy Consultation Paper* (the “*Policy Consultation Paper*”). Feedback is being accepted until September 18, 2019 on new policy opportunities and proposed amendments to the Recycling Regulation of the Environmental Management Act.

This report presents information and comments for Council’s consideration as Richmond’s proposed response to the *Policy Consultation Paper*. The feedback comments as outlined in this report have been formulated to align with Council’s actions taken to date on the issue of single-use plastics.

This report supports Council’s Strategic Plan 2018-2022 Strategy #2 A Sustainable and Environmentally Conscious City:

Environmentally conscious decision-making that demonstrates leadership in implementing innovative, sustainable practices and supports the City's unique biodiversity and island ecology.

2.1 Continued leadership in addressing climate change and promoting circular economic principles.

2.2 Policies and practices support Richmond's sustainability goals.

Background

At the May 21, 2019 Council meeting, Council resolved to request the provincial government’s support to address single-use items by adopting a comprehensive single-use item reduction strategy. A resolution to this effect was also forwarded to the 2019 Union of British Columbia Municipalities convention. The action being undertaken through the *Policy Consultation Paper* is, therefore, consistent with Council’s request of the province in this regard.

Council has taken further steps in regard to the issue of reducing plastic waste by giving first three readings to *Single-Use Plastic and Other Items Bylaw No. 10000*, which was sent to the Ministry for approval on July 23, 2019. In accordance with Council direction, community engagement on proposed Bylaw 10000 has commenced.

As part of employing further strategies to promote overall waste reduction, reduce greenhouse gas emissions, and incorporate circular economy principles into policy approaches, on February 25, 2019 Council directed staff to review the City’s current purchasing practices for ways to support the circular economy. At their May 27, 2019 meeting, Council approved a work plan whereby staff and vendors would be engaged over the course of a year to develop new criteria for City procurements. The new policy amendments are being formulated to include requirements which align with Council’s objective in this regard.

Analysis

CleanBC Plastics Action Plan

The Ministry has indicated that comments and feedback on the *Policy Consultation Paper* will be received through public survey, formal submission, email, or regular mail until September 18, 2019. After that time, the Ministry will compile and review all comments and publish a *What We Heard Report*, to be posted publicly in late 2019. Public feedback will be considered as part of developing a new regulatory framework for plastic waste in the Fall 2019/Winter 2020.

Staff have proposed feedback comments (Attachment 1) for submission to the Ministry regarding questions posed in the *Policy Consultation Paper* (Attachment 2). The proposed feedback that follows focuses on the four key theme areas, with the overarching recognition that waste prevention is the highest priority:

1. ***Bans on single-use packaging:*** *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.*

This area requests feedback on the issue of whether bans should be implemented on plastic packaging in the province, the types of bans to be considered, those plastic items that should be priority considerations and whether exemptions should be considered.

The comments outlined in Attachment 1 indicate support for bans on plastic packaging to align with that considered by Council per *Single-Use Plastics and Other Items Bylaw No. 10000*, as well as past direction from Council to urge the province to consider an Extended Producer Responsibility (“EPR”) program for cigarettes (January 14, 2019). The opportunity to include other plastics, such as plastic utensils and plastic balloons has also been identified, should Council support inclusion of these items in the feedback provided.

Information and comments concerning banned biodegradable and compostable plastics and establishing appropriate certification standards (per Council resolution of May 21, 2019), have also been included. Feedback on exemptions to address accessibility issues, and health and safety matters, food protection, etc. is also included.

Comments are included in support of granting local governments the authority to pass appropriate bylaws to help mitigate problematic waste in their communities.

2. ***Dramatically reduce single-use plastic in landfills & waterways:*** *Requiring producers to take responsibility for more plastic products, ensuring more single-use items like sandwich bags, straws and cutlery get recycled.*

This area requests feedback on including packaging-like products and single-use items in the Recycling Regulation and whether exemptions should be permitted. The feedback in Attachment 1 identifies support for ensuring these items can be readily recycled, and for including items such as stir sticks, straws, etc. The comments provided suggest that life

cycle considerations and externality costs also be embedded into the Recycling Regulation for these items as part of building circular economy principles.

Suggested exemptions relate to health and safety as well as food preservation considerations.

3. *Plastic bottle and beverage container returns:* *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.*

This area seeks input on the Ministry's proposal to include milk-type beverage containers as a component of the deposit-refund schedule in the Recycling Regulation, as well as establishing a uniform 10 cent deposit-refund amount for all beverage containers. Additionally, feedback is sought on allowing electronic refunds in alternative forms of cash.

The feedback presented in Attachment 1 reflects support for inclusion of milk-type beverage containers as part of the deposit-refund schedule, as well as a uniform 10-cent fee for all beverage containers. In relation to milk containers, there have been past concerns about affordability impacts, which are noted for the province's consideration. In relation to electronic refunds, the comments outlined reflect support for this change, as it is likely to increase program participation through convenience.

4. *Reducing plastics overall:* *Supporting effective ways to prevent plastic waste in the first place and ensuring recycled plastic is re-used effectively.*

This area explores support around development of national standards for recycling content as well as targets. There is also a general feedback opportunity on other provincial policies and actions.

As outlined in Attachment 1, the feedback presented highlights the importance of standards to create market demand for recycled plastic materials by requiring a minimum amount of recycled content in new packaging and products. This will help create a shift toward circular economy concepts. Promoting recycled content standards at the highest level of governmental policy is suggested. Methods to help create the required recycling infrastructure, such as through subsidies, are also suggested.

Comments have also been included to identify current challenges within the Province's EPR program, such as those relating to scope. For example, it can be confusing for residents to understand that only plastic packaging is included in residential recycling programs vs. other plastic materials, etc. The opportunity to promote other problematic materials which are not currently captured in the Province's EPR program (e.g. propane tanks, etc. – which will be the subject of a separate report) are also included.

The B.C. government has initiated consultation on potential regulatory changes to address the issue of plastic waste. This presents the opportunity for the City to provide feedback to support the priority items Council has identified. These items and other feedback are included in Attachment 1 for Council's review and submission on behalf of the City.

Financial Impact

None.

Conclusion

This report presents an overview of the *CleanBC Plastics Action Plan* and provides City of Richmond feedback recommendations on the *Policy Consultation Paper* for Council's consideration for submission to the B.C. Ministry of Environment and Climate Change Strategy.



Suzanne Bycraft
Manager, Fleet and Environmental Programs
(604-233-3338)

SJB:kn

- Att. 1: *CleanBC Plastics Action Plan: Policy Consultation Paper* – City of Richmond
Comments
- 2: *CleanBC Plastics Action Plan: Policy Consultation Paper*

City of Richmond Comments:

CleanBC Plastics Action Plan: Policy Consultation Paper.
 Ministry of Environment and Climate Change Strategy

1 Bans on single-use packaging Determine which types of plastic packaging to phase out altogether, as well as any necessary exemptions.	
Province Questions	City of Richmond Comments
<p>a) 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?</p>	<p>Yes. A provincial strategy to ban single-use plastic is needed to harmonize policy and reduce confusion and barriers for the public. A provincial strategy would also provide clarity and a level playing field for business.</p> <ul style="list-style-type: none"> • Priority single-use plastics should include, but not be limited to, items such as plastic checkout bags, polystyrene foam, plastic straws, and plastic utensils. • Other priority items that should be regulated and/or prohibited are those having the most significant impact on the environment, i.e. plastic filters from cigarettes, plastic balloons, etc.
<p>b) 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)?</p>	<ul style="list-style-type: none"> • Biodegradable and compostable plastics should be banned outright as these are not compatible with current commercial composting facility processes and could result in microplastics in the finished compost product. • A mandatory certification program should be introduced at the provincial level for standards which align with recycling and composting processing operations. • Oxo degradable plastics of all types should be banned outright since these are only designed to fragment (not fully decompose) when exposed to sunlight and have the same negative environmental impacts as a traditional plastic bag when littered (i.e. in the ocean). • Disposal bans need careful consideration as they can have the unintended consequence of creating an increase in the amount of materials being illegally dumped, creating even greater environmental risk and additional costs for governments. • Bans on sale will force the reduction of unnecessary plastic waste and will promote/encourage consumer behaviour change. It will be important to delineate when the ban on the sale of these items will be applicable – i.e. at point of sale - allowing the bulk sale of the items as products, or an all-encompassing ban on the sale restricting use at homes and businesses as well. • Bans on use are not suggested as these will be difficult to enforce and this will conflict with needed exemptions for health and safety reasons.

City of Richmond Comments CleanBC Plastics Action Plan: Policy Consultation Paper (cont'd)

	Province Questions	City of Richmond Comments
c)	<p>If a ban was applied how should exemptions be considered?</p>	<ul style="list-style-type: none"> • Exemptions for disability and accessibility needs should be considered for all items – specifically plastic straws. • Exemptions for hospitals and licensed care facilities under the <i>Community Care and Assisted Living Act</i>, and charitable societies in good standing with the <i>Society Act</i>. • Exemptions should also be considered for items that may not have suitable recyclable, reusable or compostable alternatives readily available on the market i.e. produce bags. • Exemptions for health and safety considerations (particularly relating to the medical environment); food safety and preservation considerations, etc.
d)	<p>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?</p>	<ul style="list-style-type: none"> • Federal government – should hold the authority to ban the use of certain problematic materials across the country that have far-reaching impacts, e.g. the federal ban on the manufacture, import and sale of toiletries that contain plastic microbeads, issues that impact the marine environment (i.e. fishing industry, cruise ship industry, marine industry, etc.). • Provincial government – as each province and territory has their own environmental management regulations, the power to implement province wide bans and other restrictions on the sale of single-use items should remain with the provincial government. Bans at this level will ensure uniformity and clarity for residents across the province. • Local government – should be given the authority to enforce the provincial ban within their communities. Local governments should also be given the authority to implement bans on items that the local authority considers problematic and that are not already regulated by the province. • Standards are also needed (at either the federal or provincial levels) to guide compostable, recyclable and reusable environmental claims to avoid product green-washing.

City of Richmond Comments CleanBC Plastics Action Plan: Policy Consultation Paper (cont'd)

2 More recycling options Expanding producer responsibility for packaging-like products and single-use items	
Province Questions	City of Richmond Comments
<p>a) 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?</p>	<ul style="list-style-type: none"> • Packaging-like items should be regulated to be readily recyclable.
<p>b) 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>	<ul style="list-style-type: none"> • Single-use items that serve a one-time purpose should be considered for inclusion in the Recycling Regulation, i.e. plastic straws, stir sticks and cutlery are examples. • Items that should be excluded from the Recycling Regulation are those that are needed for health and safety reasons and/or for food/product preservation. • Life cycle considerations and externality costs should be embedded into the Recycling Regulation to incorporate circular economy principles.

City of Richmond Comments CleanBC Plastics Action Plan: Policy Consultation Paper (cont'd)

3 Expanding plastic bottle and beverage container returns Expanding recovery and recycling of beverage containers	
Province Questions	City of Richmond Comments
a) Do you have comments or suggestions on the ministry's proposal to include milk and milk substitutes in the beverage container deposit-refund schedule?	<ul style="list-style-type: none"> • Support to decision to include milk containers and milk substitutes in the beverage container deposit-refund schedule. • Acknowledge this has been a challenge due to potential social impacts (affordability issues) for some sectors of the population.
b) Do you have comments or suggestions on the ministry's proposal to create a uniform 10 cent deposit-refund for all beverage containers?	<ul style="list-style-type: none"> • Support the decision to increase the deposit-refund to 10-cents for all beverage containers. • Increase the availability and ease of refund centres to encourage their return – implement refund vending machines
c) 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)?	<ul style="list-style-type: none"> • Good opportunity to increase participation in the program and remain relevant in the market today.

City of Richmond Comments CleanBC Plastics Action Plan: Policy Consultation Paper (cont'd)

4	<p>Reducing plastic overall Development of national recycled content performance standards</p>	
	<p>Province Questions</p>	<p>City of Richmond Comments</p>
<p>a)</p>	<p>What should B.C. consider in the development of a national standard on recycled content and any associated targets?</p>	<ul style="list-style-type: none"> This is likely the single biggest and most impactful policy initiative that will help create product demand and encourage growth in the recycling processing sector. Strongly support policies which create such a standard on a national level. Offer subsidies or grants for new recycling infrastructure to encourage the creation of processing locally to reduce GHG output.
<p>b)</p>	<p>Do you have comments or suggestions on any related provincial policies or actions?</p>	<ul style="list-style-type: none"> The EPR program in British Columbia is an excellent program. However, there are challenges with issues relating to the scope and breadth of what is included in this program. For example, not all pesticides are included, leaving residents (and invariably, local governments) to fill the void to avoid negative environmental impacts. There are similar challenges with the Recycle BC program and what is captured in the scope of these programs (i.e. institutional and commercial items of the same make/type are not included). There have also been challenges within the Recycle BC mandate for managing materials in the public realm. These challenges are making it confusing for residents to know what and how to recycle different materials and is invariably pushing costs onto taxpayers/local governments to address. There are other materials not captured in product stewardship programs including compressed gases (fire extinguishers, propane tanks, butane cylinders, etc.) that are creating challenges and added cost burdens for local governments. Robust programs relating to prescription and non-prescription (natural health care products) medications are needed to avoid improper disposal (landfill, sewage systems, etc.).



Plastics Action Plan

POLICY CONSULTATION PAPER



The ministry is seeking feedback on new policy opportunities and proposed amendments to the Recycling Regulation of the Environmental Management Act by September 18, 2019 to address plastic waste.

Instructions on how to provide comments are provided on the last page of this consultation paper.



Introduction

British Columbians want action on plastic waste. Too often plastic packaging and single use items end up as litter in our communities, waste in landfills or debris in lakes, rivers and oceans. Plastic pollution hurts wildlife and harms ecosystems, and it is increasing year after year. The Ministry of Environment and Climate Change Strategy recognizes that new steps are needed and is proposing action in four connected areas.

1 BANS ON SINGLE-USE PACKAGING	
<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>	
2 DRAMATICALLY REDUCE SINGLE-USE PLASTIC IN LANDFILLS & WATERWAYS	
<i>Requiring producers to take responsibility for more plastic products, ensuring more single-use items like sandwich bags, straws and cutlery get recycled.</i>	
3 PLASTIC BOTTLE AND BEVERAGE CONTAINER RETURNS	
<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>	
4 REDUCING PLASTICS OVERALL	
<i>Supporting effective ways to prevent plastic waste in the first place and ensuring recycled plastic is re-used effectively.</i>	

Through the release of this consultation paper, B.C. is engaging on the development of new policy options and seeking feedback on proposed amendments to improve existing programs.

B.C. has been actively involved in the development of a Canada-wide Strategy and Action Plan on Zero Plastic Waste (Strategy and Action Plan), and will continue to support and align with longer-term proposed federal initiatives to ban harmful single-use plastics.

Dramatically Reducing Plastic Use

DEVELOPING A PATH FORWARD WITH NEW POLICY OPTIONS

The Ministry of Environment and Climate Change Strategy (the ministry) recognizes that waste prevention is the highest priority. Plastic bans have been adopted in different forms in different jurisdictions to address the growing problem of plastic pollution — for British Columbia, it's critical that we solicit public input on what forms potential bans on plastic packaging could take. For instance, there may be items of interest to British Columbians which are not covered by the proposed federal ban and that are within B.C.'s jurisdictional authority, or that are a priority due to B.C.'s coastal and remote geography.

There are also actions being taken by local governments in B.C. that could be supported by a provincial harmonized approach. B.C. proposes to collaborate with all levels of government both to avoid duplicating regulatory initiatives, and to progress actions that would have an immediate impact and protect B.C.'s environment. In addition, B.C. proposes to work with the federal government to develop national recycled content standards to ensure that in the longer term any new plastics and packaging produced contain recycled plastic.

NEW POLICY OPTIONS

- » Consider provincial bans for plastic packaging under the *Environmental Management Act*.
- » Support the development of recycled content performance standards being led by the federal government.



More than 40% of plastic is used only once. We can do our part to change this, and we want your thoughts and ideas on how to do it best.

Expanding Recycling and Recovery

AMENDMENTS TO THE RECYCLING REGULATION

By expanding recycling and recovery of plastics that are in use, we can significantly reduce the waste that accumulates in landfills and waterways. By doing this as efficiently as possible, we can improve the supply of clean recycled plastics for re-manufacturing. When this strategy is combined with higher recycled content standards for products, it can reduce the need for new plastics to be created.

Both expanding producer responsibility and expanding B.C.'s beverage container return system can be achieved through changes in existing regulations. B.C. currently regulates Extended Producer Responsibility (EPR) for many products, requiring producers (manufacturers, distributors and retailers) of designated products to take responsibility for the life cycle of their products, including collection and recycling. This shifts the responsibility from taxpayers, local government or Indigenous communities to the producers and consumers of a product.

By requiring producers to be accountable, EPR programs reduce waste by incentivizing producers to design products that are recyclable and durable in order that they can be recovered for future use instead of going to disposal. This further supports a circular economy approach to waste management where resources are continually conserved and reused as raw materials.

B.C. proposes to expand existing EPR by including single-use items and packaging-like products under the Recycling Regulation¹ to ensure that these items are being managed responsibly through EPR programs prior to any potential federal bans coming into force (estimated for 2021 and beyond).

B.C. is able to move quickly in this regard as the North American leader with more than twenty-two EPR programs already in place. Expanding EPR to cover these items enables B.C. to capture any items that are beyond the scope or exempted from any federal ban.

¹ <https://bit.ly/2Oaqi5n>

The proposed amendments also include an update to the beverage container deposit system that would reduce the prevalence of littered single-use bottles in the environment and landfills by an estimated 50 million bottles per year.

As these actions would result in an increase in plastic items to be recycled, the Province would work with the federal government to develop national recycled content standards — ensuring that new single-use plastics and packaging-like products are produced using recycled plastic content.

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.

Too often plastic packaging and single use items end up as litter in our communities, waste in landfills or debris in lakes, rivers and oceans. Plastic pollution hurts wildlife and harms ecosystems, and it is increasing year after year.



We Want Your Input

HERE ARE SOME SOLUTIONS WE ARE CONSIDERING

1 BANS ON SINGLE-USE PACKAGING



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.

The *Environmental Management Act*² (EMA) governs the management of waste in British Columbia, to protect public health and the environment. The EMA allows for the banning of packaging by prohibiting, regulating or restricting the use or sale of packaging materials. British Columbia is considering bans as a policy option for plastic packaging and would like input on viable approaches.

Bans can be an effective policy tool to prevent plastic waste from occurring in the first place and help reduce the use of plastics that are commonly found in the environment and littered in our communities. Bans can also be used to divert recyclable plastics away from landfills to recycling facilities. They are also used to stop the use of plastics that are not recyclable or are considered difficult to recycle and manage.

Plastic packaging includes items such as plastic films (e.g., plastic bags, pouches or wraps) and containers (e.g., bottles, cups, tubs, and other hard plastics) that are used to package food and beverage products, consumer goods, cosmetics and personal care items.

Recent studies have shown that plastic packaging accounts for approximately 47% of all plastic waste discarded, and the majority of single-use plastics are used as packaging³.

² <https://bit.ly/1FETB2d>

³ <https://bit.ly/3Z0HP0J>

EXAMPLES OF BANS

» The European Union will ban single-use plastic products (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 by 2021.

» Many US states such as Maine, Vermont, California, and New York have enacted bans on plastic packaging including plastic bags and polystyrene foam.

B.C. Local Governments:

» The City of Vancouver single-use item reduction strategy includes bans for plastic straws, foam cups and foam take-out containers beginning in 2020.

» More than 23 communities in B.C. have been actively working on developing bans for single-use plastic items such as bags and straws.

Plastic packaging bans are typically implemented through the following approaches:

- » **Bans to regulate the sale or use:** regulate the supply of certain plastic packaging into the marketplace or prevent or restrict the use of certain plastic packaging — e.g., a ban on the use of polystyrene foam in packaging and takeout containers and cups, or a ban on an identified type of packaging, such as a ban on plastic bags to contain or transport goods at the point of sale.
- » **Disposal bans:** prohibit the disposal of plastics that instead can be readily recycled. These bans are typically implemented at the disposal site located within the jurisdiction applying the ban — e.g., an energy-from-waste facility or landfill — and at transfer facilities where wastes are aggregated for transport to a final disposal facility. Bans on the disposal of materials, such as plastics, are implemented after systems are in place to collect and recycle the banned materials (such as those created under EPR programs).

Globally there are a number of new regulations banning plastics. Bans on the sale of plastic bags have been introduced in 65 countries, as well as many regional and local jurisdictions. The federal government recently announced their intention to ban harmful single-use plastics as early as 2021 to reduce pollution from single-use plastic products and packaging, such as shopping bags, straws, cutlery, plates, and stir sticks.

British Columbia communities have also taken significant steps to implement strategies, including bans, levies or fees on plastic bags. Beyond plastic bags, many B.C. communities are pursuing single-use plastic bans on items including plastic bags and straws, polystyrene foam, disposable cups and takeout food containers.

The City of Victoria was the first municipality in B.C. to ban plastic bags in July 2018 through a business licensing bylaw. Municipalities may regulate in relation to a number of areas under the *Community Charter*. On July 11, 2019 the B.C. Court of Appeal ruled, however, that the intent of the bylaw was for the *protection of the natural environment* and therefore under the *Community Charter*, municipalities wishing to exercise their regulatory authority for protection of the natural environment are required to obtain Provincial approval. The Province is currently reviewing all aspects of the decision and recognizes that local governments need clarity on what their authorities are and the process for acting on those authorities should they so desire. Feedback from this engagement process will inform actions and processes moving forward.

Recent studies have shown that plastic packaging accounts for approximately 47% of all plastic waste discarded, and the majority of single-use plastics are used as packaging.



When policy tools, such as a ban, are evaluated, it is important to consider all impacts and to ensure that viable alternatives are available. For example, research has shown that switching from single-use plastic bags to single-use paper bags results in simply trading one set of environmental costs for another. A single-use paper bag can require up to four times as much energy to manufacture and produces two times the greenhouse gas emissions when compared to a single-use plastic bag; however, they are bio-degradable and do not persist in the environment like plastic bags do. Successful policies have included the use of bans, generally in combination with levies and fees to decrease unnecessary single-use consumption and to encourage the reuse of bags and other sustainable alternatives. It is critical to find the right policy approach that results in the fewest unintended consequences.

In addition, exemptions to the ban are often required where no viable alternative is found, or to ensure that the essential safety, health, and wellness of all individuals is maintained. For the remaining plastic packaging and single-use plastics, EPR programs are necessary to ensure these materials can be collected and recycled back into new packaging and products.

- » **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?**
- » **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)?**
- » **If a ban was applied, how should exemptions be considered?**
- » **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?**

2

**MORE
RECYCLING OPTIONS**



Dramatically reduce single-use plastic in landfills and waterways: requiring producers to take responsibility for more plastic products, ensuring more single-use items like sandwich bags, straws and cutlery get recycled.

EXPANDING PRODUCER RESPONSIBILITY FOR PACKAGING-LIKE PRODUCTS AND SINGLE-USE ITEMS

British Columbia is a national leader in recycling with the widest range of regulated items collected — its existing province-wide Extended Producer Responsibility (EPR) program regulates recycling of packaging and paper products. The inclusion of packaging-like products and single-use items in the Recycling Regulation would expand the type of plastic products that producers are required to collect for recycling from sectors that may include, but are not limited to, residential and municipal properties province-wide.

Packaging-like products are materials that are sold as a product but are in turn used as packaging. This includes re-usable plastic containers, freezer/sandwich bags, canning jars, wrapping paper, and moving boxes. Single-use items are materials that are not necessarily packaging but similarly serve a one-time purpose. This includes plastic straws, stir sticks, cutlery and 'disposable' items purchased in multiples, such as plates, bowls, cups, and party supplies that could be easily diverted in a manner similar to packaging and packaging-like products. This change would require an amendment to the Recycling Regulation.

- » **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?**
- » **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?**

3 EXPANDING PLASTIC BOTTLE AND BEVERAGE CONTAINER RETURNS



Improving 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.

EXPANDING RECOVERY AND RECYCLING OF BEVERAGE CONTAINERS

Expanding the EPR deposit-refund system to cover all beverage containers and standardizing the refundable deposit to 10 cents, as well as modernizing the system, would capture and recycle millions more single-use containers, while reducing consumer and retailer confusion over what is and is not covered under a deposit-refund program.

Beverage containers that are currently excluded from the deposit-refund system would now be included, such as milk and milk substitutes (e.g., rice milk, soya milk, flavoured milk, and the array of milk-like products including energy drinks and caffeinated milk beverages). Milk and related products are currently under the residential packaging and paper products schedule of the Recycling Regulation. Obligating these products under the beverage container deposit-refund schedule would provide the needed incentive for greater returns from residents and would capture all containers from commercial generators (e.g., restaurants, schools, offices) that are currently exempted from the Recycling Regulation.

This change would require an amendment to the Recycling Regulation, which currently has a range of deposit-refund amounts from 5 to 20 cents depending on the container type. Creating a uniform 10 cent deposit-refund for all beverage containers translates into an estimated additional 50 million beverage containers diverted from landfills and our environment. Most plastic beverage containers sold today have a 5 cent deposit and are frequently discarded, yet beverage containers with a 10 cent deposit, such as beer cans/bottles, are returned more often by consumers.

The Recycling Regulation currently requires all refunds for returning beverage containers to be paid in cash. Modernizing the Recycling Regulation to also allow refunds to be electronic and paid in an alternative form of cash (e-transfer, cheque, in-store credit, charitable donation, or similar alternatives), would increase ease and efficiency for the consumer. An example includes convenience options such as drop-and-go systems where customers set up an account, tag their mixed bag of containers and drop it in an automated receiving system. Bags are later picked up and sorted, and credit is applied to the customer's account. The existing depot network and cash refunds would still be maintained as an option to ensure those individuals and communities depending on cash refunds continue to have access to this immediate source of income.

Other jurisdictions have seen success with raising deposit-refund rates, expanding to more products and modernizing return systems. Oregon's recovery rate was stagnant at 65% in 2016 until a doubling of deposit-refunds from 5 to 10 cents (for all beverage containers), coupled with enhanced return options such as drop-and-go bags, resulted in an overall return rate of 90% in 2018. In 2008, Alberta increased deposit-refunds to a minimum 10 cents and expanded the program to include milk and related products, resulting in total recovery rates since increasing from 75% to 85%.

In two years' time, B.C. would review the impact of the deposit rate changes to determine if further increases to the beverage container deposit rate are required to improve the recovery rate.

- » **Do you have comments or suggestions on the ministry's proposal to include milk and milk substitutes in the beverage container deposit-refund schedule?**
- » **Do you have comments or suggestions on the ministry's proposal to create a uniform 10 cent deposit-refund for all beverage containers?**
- » **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)?**

4 REDUCING PLASTICS OVERALL



Supporting effective ways to prevent plastic waste in the first place and ensuring recycled plastic is re-used effectively.

DEVELOPMENT OF NATIONAL RECYCLED CONTENT PERFORMANCE STANDARDS

Recycled content performance standards (standards) go hand in hand with extended producer responsibility programs. EPR programs collect and recycle the materials, turning them into recycled plastic commodities. Standards create the demand for recycled plastic materials by requiring a minimum content of recycled plastic in new packaging and products.

Standards help producers of plastic products to design products with recyclability in mind, which helps to eliminate products that are hard to recycle. Having a common national standard provides clarity and avoids a patchwork approach across provinces and territories for producers. National standards also incentivize and complement government procurement policies and targets requiring purchased plastic products to contain recycled plastic. Procurement policies at all levels of government can stimulate and support market development in this area.

Increasing the levels of recycled plastic content in products can also result in greenhouse gas emissions reductions to help meet the goals set out in CleanBC⁴, the Government's plan to reduce carbon pollution. The production and manufacturing of packaging and products, including the increasing use of plastics, generates greenhouse gas emissions. These emissions can be substantially mitigated by ensuring that packaging and products are reused and, once they reach the end of their life, are collected to be recycled back into new packaging and products. This reduces the need to produce more plastic from virgin materials and fossil fuels.

Recycling plastic beverage containers, for example, has been shown to reduce greenhouse gas emissions by almost 70% compared to producing plastic from virgin resources⁵.

As noted earlier, B.C. has been actively involved in developing the Canada-wide Action Plan on Zero Plastic Waste⁶ which identifies the federal government as leading the development of national performance requirements and standards for plastics. British Columbia has a significant opportunity to collaborate and influence the development of these standards, in particular with the proposed recycled content standard.

- » **What should B.C. consider in the development of a national standard on recycled content and any associated targets?**
- » **Do you have comments or suggestions on any related provincial policies or actions?**

Recycling plastic beverage containers, for example, has been shown to reduce greenhouse gas emissions by almost 70% compared to producing plastic from virgin resources.



⁴ <https://cleanbc.gov.bc.ca/>

⁵ <https://bit.ly/30UDrkd>

⁶ <https://bit.ly/2Q0QVtP> and <https://bit.ly/2XbqmAx>

Implementation

The actions proposed in this consultation paper will further advance the reduction, diversion and recyclability of plastics and other single-use items in B.C.

Feedback received will help B.C. determine other potential actions that should be developed or further consulted upon at the provincial level. Your input is welcomed regarding other potential products for inclusion in the Recycling Regulation, or other policy initiatives to minimize plastic waste.

All comments received through webinars, meetings, mail or email by 18 September 2019 will be compiled for review by ministry staff before final drafting of the regulatory amendments. This is expected to be completed in 2019.

By expanding recycling and recovery of plastics that are in use, we can significantly reduce the waste that accumulates in landfills and waterways.



Additional Information Sessions

The ministry will conduct a series of webinars on the proposed revisions. The webinars will review the information contained in this consultation paper and provide an opportunity to ask questions and provide comments.

If you are interested in participating in a webinar, please contact the email below:
Email: Plastics@gov.bc.ca

Providing Feedback

The ministry welcomes comments on the information and proposals outlined in this consultation paper, and has provided the following opportunities for feedback:

1. **Complete the public survey at:**
<https://cleanbc.gov.bc.ca/plastics>
2. **Send a formal submission to:** Plastics@gov.bc.ca
Read the guidelines for formal submissions at:
<https://cleanbc.gov.bc.ca/plastics>
3. **Email your comments to:** Plastics@gov.bc.ca
4. **Mail your comments to:**
*Ministry of Environment and Climate Change Strategy –
Recycling Regulation Amendments
PO Box 9341 Stn Prov Govt
Victoria, BC V8W 9M1*

All comments received through the public survey, formal submission, webinars, mail or email by September 18, 2019 will be compiled for review by ministry staff before final drafting of the amendments to the Recycling Regulation or other policy changes. This is expected to be completed in 2019.

Please note that each organization's submission with opinions and identifiers could be made public either through a decision by the Ministry or if a Freedom of Information request is made under the *Freedom of Information and Protection of Privacy Act*.

Thank you for your time and comments.