

September 4, 2019

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

Sent via email: plastics@gov.bc.ca

Dear Minister Heyman,

Re: Formal Feedback Submission on the Clean BC - Plastics Action Plan

The Cariboo Regional District (Cariboo RD) commends you on the call for feedback on the Clean BC Plastics Action Plan and looks forward to improvements to the B.C. Recycling Regulation.

The Cariboo RD would like to take this opportunity to voice that significant amounts of plastics and other recyclable packaging could be diverted from landfills across B.C. by amending the Recycling Regulation to include Industrial, Commercial or Institutional (ICI) packing and printed paper. A June 2019 waste composition study for the Cariboo RD identified **12% of the Region's municipal solid waste as ICI packaging and printed paper (PPP) recyclables.**

Bans on Single-Use Packaging

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

Yes, a provincial level plastics reduction regulation or ban that targets plastic packaging and single use plastics could benefit the environment and solid waste systems across B.C., **so long as replacement products do not have a greater overall negative environmental impact.**

Non-recyclable items such as plastic utensils, stir sticks and straws, should be addressed first, followed by recyclable problematic items, like plastic "carry out bags" and polystyrene packaging.

2. *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)?*

Provincial regulation should focus on the ban of the use, free or purchased, of priority plastic items. In addition, the Province should be working with the Federal government to develop a strategy to reduce production of plastics produced with virgin fossil fuels in Canada. This should include suspending current subsidies for the plastics industry in Canada and re-directing them to facilities focused on recycled content.

Disposal bans do not prevent the production or use of specific waste types and are better suited for diversion of larger and easily visible materials for recycling, i.e. for electronics or cardboard.

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

Exemptions should be provided for care facilities and hospitals for use by individuals who require bendable straws or other banned plastic items as required for specific medical conditions. Exemptions should also be provided for accessibility needs.

4. 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?

For the sake of efficiency and consistency, the Province is best equipped to issue bans on the use or sale of specific items for the protection of the environment. If some municipalities wish to peruse additional bans, they can request Provincial approval.

Disposal bans are best implemented at a municipal or regional district level, as they should only be used in communities where viable alternative recycling options are available and there is enough staff to enforce bans at the disposal facility.

More Recycling Options (Dramatically Reduce Single-Use Plastics in Landfills and Waterways)

1. 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?

Packaging-like products are recyclable and are currently being included with PPP by many residents across B.C. because they cannot differentiate between "packaging" and "package-like" items. Yes, packaging-like products should be added to Schedule 5 of the Recycling Regulation, as should all recyclable ICI PPP.

Any packaging-like products that are not recyclable should not be included.

2. 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?

So long as a ban on priority single use plastics is implemented by the Province, in addition to adding recyclable single use plastics to Schedule 5 of the Recycling Regulation, then yes, the Cariboo RD is in support of this proposal. Again, ICI single use items should be included in Schedule 5 of the Regulation.

Non-recyclable or very difficult to recycle items should not be included; these may or may not include plastic cutlery, straws and stir sticks.

Expanding Plastic Bottle and Beverage Container Returns

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

The addition of all **single serving** sizes of milk and milk substitute containers is a welcome addition to the deposit-refund schedule, as these are the sizes of containers that are most often found as litter, and the ones that bottle depots are often left to manage on their own because consumers do not realize they are not part of the deposit program. Adding a deposit to non-single serving, or "family sized" containers may increase financial hardship on families who are already struggling and who may have barriers to collecting the refund deposit. In many rural areas of the province, local retailers do not have the capacity to store empty deposit containers, or the funds to ship containers to depots in urban centers and; therefore, do not offer refunds on deposit beverage containers they sell, even though they are supposed to accept 24 per person, per day by law.

Residential generated family sized milk and milk substitute containers are currently being recovered and recycled without issue by Recycle BC, it is recommended that ICI generated non-single use sized containers be added to Schedule 5 of the recycling regulation.

Many bottle depots across B.C. are currently struggling for staff and storage space, especially in urban centers where rental space is at a premium. Adding large volume containers such as family sized milk and milk substitute containers to the deposit-refund schedule will only exacerbate the issue.

If all sizes of milk and milk substitute products are added to the deposit refund schedule, the schedule should also be amended to increase the minimum number of containers accepted for return from retailers to at least 50 containers per person, per day, and include some means to enforce this requirement.

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

The uniform 10 cent deposit-refund for all beverage containers would also be a welcome improvement to the deposit-refund program. In the June 2019 waste audit for the Cariboo RD, 1.51% of total municipal solid waste disposed of was allocated to deposit beverage containers. The increased deposit may encourage more consumers to return their containers for recycling and reduce the number of littered beverage containers, the number going to landfill, and the number entering the Recycle BC program.

3. *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)?*

For urban populations this change could make returning deposit beverage containers more appealing and should therefore be allowed. The expansion of the "express" program to rural communities would be a welcome improvement and could be a solution to the current lack of access to deposit returns that many rural communities in B.C. face.

Reducing Plastics Overall

1. *What should B.C. consider in the development of a national standard on recycled content and any associated targets?*

B.C. should work with the Federal government to establish gradual incremental targets for recycled content at a national level. B.C. alone does not consume enough packaging to make an impact on packaging that is sold nationally or globally.

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

The Cariboo RD would like to see the B.C. Recycling Regulation updated to include: all hazardous wastes, including their empty packaging; veterinary medicines; all sizes of lithium-ion batteries; off-road tires and tires on rims; all electronic and electrical items; propane cylinders including single use canisters; fire extinguishers; plastic household/recreational products that are not included in the packaging and printed paper program; commercial packaging and printed paper; mattresses and box springs; textiles, books, bulky items/furniture, and construction and demolition waste.

Yours sincerely,

Margo Wagner
Chair

c: Donna Barnett, Member of Legislative Assembly, Cariboo-Chilcotin
Coralee Oakes, Member of Legislative Assembly, Cariboo North