

**DATE:** September 4, 2019

**FILE:** 5360-01

**TO:** Chair and Directors  
Comox Strathcona Waste Management Board

**FROM:** Russell Dyson  
Chief Administrative Officer

Supported by Russell Dyson  
Chief Administrative Officer

*R. Dyson*

**RE: Single-Use Items Reduction Report**

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### **Purpose**

The purpose of this report is to provide information and recommendations supporting a reduction to the distribution of single-use items in the Comox Strathcona Waste Management (CSWM) service area in response to the CleanBC Plastics Action Plan Policy Consultation Paper.

### **Recommendation from the Chief Administrative Officer:**

THAT the Comox Strathcona Waste Management Board submit a formal response to the CleanBC Plastics Action Plan Policy Consultation Paper;

AND FURTHER THAT the Comox Strathcona Waste Management Board recommend to member municipalities to exclude compostable and biodegradable plastics as allowable substitutions within single-use item reduction bylaws;

AND FURTHER THAT the Comox Strathcona Waste Management Board encourage visitors, residents and all businesses within the service area to restrict the use of single-use items by allocating \$8,000 in communication and educational resources from the 2020 budget from 391, general education and advertising;

AND FINALLY THAT the Comox Strathcona Waste Management Board direct staff to track the impact of the material bans for the purposes of reporting in the next Solid Waste Management Plan using business outreach and waste audit tools.

### **Executive Summary**

The impact of single-use plastics on the environment and water systems is well understood and documented. Single-use plastics are now widely regarded as an ecological danger, leaching into soils, groundwater, and the ocean, and harming marine wildlife as well as entering our food systems. In response to this crisis, all levels of governments have passed plastic reduction initiatives and laws, including local member municipalities. The Comox Valley Regional District (CVRD) Chair submitted a letter on May 3, 2019 to the Minister of Environment and Climate Change Strategy, requesting support for province-wide regulations of single-use bags.

Regional Districts do not have the authority to regulate the sale and use of single-use items, but can support member municipalities and the province in initiatives to reduce single use plastics, and to support our Solid Waste Management Plan (SWMP) goals.

- The City of Courtenay and the Village of Cumberland adopted bylaws prohibiting businesses from providing plastic checkout bags and plastic straws to customers, effective July 1, 2019.
- The Town of Comox has not adopted their bylaw, and the City of Campbell River is not pursuing a bylaw at this time.
- Residents of the CSWM service area cross-border shop and education of all residents and visitors will assist businesses in meeting customer expectations and reducing plastic consumption in the CSWM service area.
- Supporting municipalities and the province to reduce single-use items will reduce our overall waste generation rate, result in less plastic litter, and lower demands on CSWM facilities.
- The nine CSWM Recycle BC depots accepted 15 tonnes of plastic film and overwrap for recycling in 2018. This includes plastic carryout bags as well as bread bags, overwrap and other soft plastics.
- Promoting compostable and biodegradable plastics would increase operational costs at the proposed CSWM Regional Organics Processing Facility to remove contaminants, and would reduce the quality of the final compost produced.
- The federal government has committed to working collectively with other levels of government toward a common goal of zero plastic waste, including a proposed ban on single-use items by 2021.
- CleanBC has released a Plastics Action Plan, with consideration given to banning single-use items and expanding Extended Producer Responsibility to reduce plastic waste.

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**Stakeholder Distribution (Upon Agenda Publication)**

Comox Valley Nurses for Health and the Environment and Comox Valley Nurses and Nurse Practitioners of BC	✓
Council of Canadians – Campbell River Chapter	✓

**Background/Current Situation**

The impact of single-use plastics on the environment and water systems is well understood and documented. Single-use bags and other items are now widely regarded as an ecological danger, leaching into soils, groundwater, and the ocean and harming marine wildlife as well as entering our food systems. Plastics do not biodegrade and remain in the environment for hundreds of years. Single-use and disposable items make up an estimated 43 per cent of marine litter worldwide, and in Canada, are among the top twelve most collected items during Great Canadian Shoreline Cleanups<sup>1</sup>.

In response to this crisis, numerous local and provincial governments have passed or are working to pass bylaws or regulations to ban single-use items including: Prince Edward Island, Newfoundland and Labrador, Cumberland, Courtenay, Comox, Victoria, Esquimalt, Colwood, Saanich, Sooke, Tofino, Ucluelet, Qualicum Beach, Vancouver and Montreal.

<sup>1</sup> Canadian Council of Ministers of the Environment, Strategy on Zero Plastic Waste, PN 1583 (2018)

The City of Victoria passed a Checkout Bag Regulation Bylaw (No. 18-008) which came into effect July 1, 2018, whereby businesses in the City of Victoria could no longer provide customers with single-use plastic checkout bags. The bylaw allowed for paper checkout bags and reusable checkout bags to be sold for a minimum charge, and made exceptions for some plastic bags, those used for putting produce into for example. City staff visited over 200 Victoria businesses and observed that 97 per cent of businesses successfully stopped distributing single-use plastic checkout bags, and in less than one year, they estimate they eliminated 17 million plastic bags from their community.

Following the lead of Victoria and other communities, local delegations advocating for change presented to local municipal councils and both the Strathcona Regional District CVRD Boards. At the March 12, 2019 CVRD Committee of the Whole meeting, a delegation from Helen Boyd and Meghan Leahy, Comox Valley Nurses for Health and the Environment and Comox Valley Nurses and Nurse Practitioners of BC, presented information regarding the banning single-use plastic bags and straws throughout the CVRD.

Three motions were carried during the April 30, 2019 CVRD Board meeting:

*THEREFORE BE IT RESOLVED THAT the Comox Valley Regional District Board encourages its member municipalities and all businesses within the region to restrict the use of single-use plastic bags.*

*THAT the Comox Valley Regional District write to the Province of British Columbia to request province-wide business regulations to reduce single-use plastic bags and disposable plastic packaging.*

*THAT the matter of restricting single-use plastic bags be referred to the Comox Strathcona Waste Management Board for consideration of further action.*

Addressing the second motion, a letter was sent from the CVRD Chair on May 3, 2019 to the Minister of Environment and Climate Change Strategy requesting support for province-wide regulations.

This same delegation also presented to CVRD member municipalities which contributed to the passing of Single-Use Item and Single Use Plastic Regulation Bylaws in the Village of Cumberland and the City of Courtenay respectively, banning plastic carry-out bags and plastic straws. Both the Village of Cumberland and the City of Courtenay bylaws came into effect on July 1, 2019. On June 19, 2019 the Town of Comox Council also passed third reading of Bylaw No. 1923 on the banning of single-use plastic bags and straws. No bylaws have been proposed in municipalities within the Strathcona Regional District to date, but the City of Campbell River did receive a delegation in 2018 and is monitoring other communities' progress on their ban of single-use plastic bags to determine the best course of action. Details about member municipalities' specific bylaws can be found in Appendix A.

The Canadian Plastic Bag Association (CPBA), a national plastics industry lobby group, challenged the City of Victoria's bylaw in 2018 and the BC Supreme Court ruled in favor of the City. The ruling was appealed, and on July 11, 2019 the BC Court of Appeal ruled in favor of the CPBA. The Court of Appeal judges concluded that the Community Charter governing cities in BC requires that the environment minister sign off on bylaws that deal with environmental protection, and concluded the environment was the intent of the City of Victoria's bylaw.

Since the July 11, 2019 ruling, the City of Victoria's Bylaw 18-008 is of no force and effect now, and the bylaws passed by the Village of Cumberland and City of Courtenay are at risk of being challenged legally without approval from the province.

On June 10, 2019 the federal government announced initiatives to reduce plastic pollution, including supporting bans on single-use plastics as early as 2021 under the *Canadian Environmental Protection Act*, following a State of the Science assessment on plastic pollution in the environment. They will also work in collaboration with the provinces and territories to support extended producer responsibility programs for plastic packaging, which we have in BC for residents but not for packaging from industry, commercial or institutional facilities.

In response to the swell of municipal bylaws, demands from the local governments for a harmonized provincial approach, and the federal government announcement, the BC Ministry of Environment and Climate Change Strategy released a Plastics Action Plan on July 25, 2019. They are seeking feedback on new policies and proposed amendments to the Recycling Regulation to address plastic waste. The four pillars of their proposed changes are:

- Bans on single-use packaging;
- Reducing single-use plastic in landfills and waterways through expanded extended producer responsibility;
- Expansion of the plastic bottle and beverage container return program; and
- Reducing plastics overall through recycled plastic content standards.

CSWM staff have been leading a conversation on single-use items with other local governments from across the province and have engaged the Recycling Council of British Columbia to support information sharing on this topic moving forward. Consultation by member municipalities conducted in 2019 was also drawn on to support the policy approach proposed to the province. The City of Courtenay conducted an online survey on the banning of single-use items in the spring of 2019, over 1000 residents and 45 businesses responded. 46 per cent of respondents felt that expanding the ban beyond bags and straws was the most effective way to reduce the use of single-use plastics. The Village of Cumberland interviewed impacted businesses before implementing their bylaw on bags and straws, and found that five of seven food and beverage businesses were already successfully utilizing non-plastic straws, utensils and food packaging in their operations, and the other two were working to seek alternatives to their inventory. A response to the request for comments from the Ministry of Environment and Climate Change Strategy has been prepared for consideration by the Board as Appendix B.

To quantify the impact of the initiatives being proposed, it is suggested that the CSWM service reach out to select businesses in early 2020 to determine a baseline number of plastic, paper and reusable bags and plastic straws sold or distributed in 2019, for reporting within the SWMP and to follow up annually to monitor the change. An estimate of waste stream quantities for plastic bags and straws has been provided as Appendix C.

Alternatives to plastic bags, cutlery, foodservice ware and straws, such as compostable and biodegradable plastics, need to be considered when developing policy, information on unintended consequences is provided in Appendix D. Managing compostable and biodegradable plastics within the CSWM proposed Regional Organics Processing Facility would increase operational costs to remove contaminants, and reduce the quality of the final compost produced. Participation rates and diverted tonnes have been shown to increase if customers can place all wasted food and compostable food service ware into the same bin. However, if the food service ware is not compatible with the composting technology used, and if it cannot be distinguished from non-compostable plastics, then it will be removed and ultimately landfilled. A working group of regional and municipal staff have agreed on the types of organic waste to be processed in this new facility, including that compostable plastic bags used as kitchen pail liners will not be acceptable in the curbside organics collection program. This ban would extend to other compostable or biodegradable plastics within the organics collection program. CSWM staff have reached out to municipal staff

developing single-use plastic bylaws to support a coordinated approach within the region, and to engage on the issue of compostable and biodegradable plastics.

Hornby Island Co-op chose to stop using plastic bags over a decade ago, and is an example of a successful voluntary approach taken by businesses that could be effective in reducing single-use plastics in the electoral areas. Many rural residents shop in the urban centres, and most residents shop across municipal boundaries, education to all residents in the CSWM service area is important to support success for cross boundary shoppers. Collaboration between municipal governments, the respective Chamber of Commerce, and the CSWM staff will improve acceptance of the change by residents. Additionally, if member municipalities or the province chose to expand the list of single-use items targeted to include take-out containers, the CSWM service could assist in discussions with the Vancouver Island Health Authority on overcoming challenges with allowing refillable containers.

A durable reusable bag used frequently and washed regularly will perform as well as a single-use bag in keeping food safe from contamination, and will decrease landfilling and littering of plastic bags. In support of existing bylaws banning carry-out bags and straws, the education of visitors and residents within the entire service area will be important to the reduction of plastic consumption in the service area.

### Policy Analysis

The Comox-Strathcona SWMP identifies “Reduce” as the highest priority action on the waste management hierarchy. Waste reduction avoids the unnecessary use of resources such as materials, energy and water, and will contribute to a lower disposal rate per capita for the region. This initiative supports two of the main objectives of the 2012 SWMP for the CSWM service, paraphrased as:

- To work towards a goal of zero waste and aim to minimize the amount of waste buried in landfills; and
- To improve the solid waste management system to reduce greenhouse gas emissions from solid waste management activities.

Focussing on the reduction of single-use items as well as the recycling of these materials, supports both of these objectives.

Under the *Environmental Management Act*, neither the CVRD nor the CSWM service have the authority that municipalities have to regulate the distribution of single-use items to residents in the CSWM service area. Municipalities regulate business within their power under section 8(6) of the Community Charter. Regional Districts have the ability to regulate the disposal of materials. CVRD Bylaw No. 170 Tipping Fees and Charges, prohibits the disposal of product stewardship items, including packaging and printed paper. Expansion of the Recycle BC Product Stewardship program for recycling to include packaging like products such as straws, stir sticks, and utensils will increase the number of plastic items prohibited from landfill.

Only one regional district within BC has proposed a single-use item regulating bylaw, the Regional District of North Okanagan gave third reading to their proposed Checkout Bag Regulation Bylaw, No. 2826, 2019, on July 17, 2019. They have forwarded the Bylaw to the Ministry of Environment and Climate Change Strategy for their consideration. They acknowledge that they would not be able to enforce this Bylaw, as they do not issue business licences, but they see it as a model bylaw that their member municipalities could use to create a harmonized regional approach.

With a proposed provincial and federal ban on single-use items forthcoming, and model bylaws for our region in place with those passed by the Village of Cumberland and City of Courtenay, at this time no bylaw is proposed to be developed by the CSWM service.

## Options

The Board has the following options to consider:

- CSWM staff to dedicate staff resources to track the impact of the material bans for the purposes of reporting in the next SWMP using business outreach and waste audit tools.
- CSWM Board encourages its member municipalities, residents and all businesses within the service area to restrict the use of single-use items by dedicating communication and educational resources within the 2020 general education budget.
- CSWM staff to support member municipalities where requested in the development and harmonization of municipal bylaws regulating the use of single-use items within the service area.
- CSWM Board to recommend to member municipalities to exclude compostable and biodegradable plastics from single-use item reduction bylaws.
- CSWM Board to provide a written response to the policy consultation on the BC Plastic Action plan.

## Financial Factors

Advertising and public education efforts specific to this issue were not budgeted for in 2019, but \$20,000 in resources for general education advertising are available within the CSWM budget. Spending on education and communication for this initiative could be planned for within the 2020 budget.

A waste composition audit will be completed for the region after the regional organics facility is operational. Including categories specific to single-use items would complement the efforts made by member municipalities, and be a useful tool in evaluating the effectiveness of this reduction effort. This can be included within the budgeted amount for the next waste composition audit.

## Legal Factors

Section 8(6) of the Community Charter is not applicable to a Regional District, and therefore the CVRD does not have the authority to regulate and enforce the distribution of single-use plastics in member municipalities, or the Electoral Areas.

As demonstrated in the July 11, 2019 ruling by the BC Court of Appeal, a municipality must first seek provincial approval prior to enacting a bylaw that regulates the distribution of items from businesses for environmental purposes.

No legal advice was sought by the CVRD on the authority of a regional district to restrict the sale and use of single-use items within the region. Metro Vancouver and the Regional District of North Okanagan have indicated they do not have the authority to enforce a regulation on the sale and use of single-use items.

The educational, data management and collaborative options proposed to the Board do not pose an identified legal risk.

## Intergovernmental Factors

A Union of BC Municipalities' (UBCM) resolution (B126) requesting the Province of British Columbia engage the packaging industry to develop a provincial Single-Use Item Reduction Strategy as part of a provincial Zero Waste Strategy was presented at the September 13, 2018 UBCM Annual Convention and endorsed.

The BC Ministry of Environment and Climate Change Strategy has released a policy consultation paper on their proposed Plastics Action Plan, and submissions will be accepted until September 18, 2019. A response to this request has is attached as Appendix B to this report. [BC Action Plan](#)

MP Gord Johns' (Courtenay-Alberni) put forward a private member motion (M-151) advocating for a national strategy to combat plastic pollution in and around aquatic environments, including regulations aimed at reducing single-use plastics. This motion was passed unanimously in the House of Commons on December 5, 2018.

Canada has led and is a signatory to the G7 2018 Ocean Plastics Charter, and the Canadian Council of Ministers of the Environment (CCME) have agreed to work collectively toward a common goal of zero plastic waste. A Canada-wide action plan on zero plastic waste, Phase I, was released in 2019 by the CCME. [Canada Wide Action Plan](#)

### **Interdepartmental Involvement**

Research on this issue is being led by the engineering services branch of the CSWM service. Project support is provided by a number of branches as required, including but not limited to Financial Services, and Corporate Services.

### **Citizen/Public Relations**

If the Board gives direction to move ahead with an education and communications strategy, Corporate Services will be engaged to assist in developing a detailed communications plan for 2020.

Attachments: Appendix A – “Member Municipality Bylaws Introduced to August 1, 2019”  
Appendix B – “BC Plastic Action Plan Response for Ministry of Environment and Climate Change Strategy”  
Appendix C – “Plastic Bags and Straws Waste Stream Estimates”  
Appendix D – “Unintended Consequences”

Appendix A – Member Municipality Bylaws Introduced to August 1, 2019

	Cumberland	Courtenay	Comox	Notes
Bylaw Name	Single-Use Item Regulation Bylaw No. 1098, 2019	Single Use Plastics Regulation Bylaw No. 2970, 2019	Single Use Plastic Regulation Bylaw No. 1923, 2019	
Status	Adopted	Adopted	Passed 3 <sup>rd</sup> Reading June 19, 2019	<b>Subsequent to the ruling on Victoria, Comox has not adopted their Bylaw</b>
Effective Date	July 1, 2019	July 1, 2019	Proposed for <i>January 1, 2020</i>	
Enforcement Date	January 1, 2020	March 1, 2020	Proposed for <i>January 1, 2020</i>	Allows for businesses to use up old inventory
Applies To	Businesses	Businesses	Businesses	
Banned Materials	Plastic checkout bags Plastic drinking straws	Plastic checkout bags Plastic drinking straws	Plastic checkout bags Plastic drinking straws	
Materials with a Fee	None.	Paper checkout bags <i>minimum \$0.25 charge</i> Reusable bags <i>minimum \$1.00 charge</i>	Paper checkout bags <i>minimum \$0.25 charge</i> Reusable bags <i>minimum \$1.00 charge</i>	Adding a fee to paper bags reduces dependence on other single-use alternatives.
Additional Requirements	None.	Customer must first be asked whether they need a bag	Customer must first be asked whether they need a bag	Reduces overall distribution of bags, free or for a fee.
Allowed	Customers may bring in and use their own checkout bag or straw.	Customers may bring in and use their own checkout bag or straw.	Customers may bring in and use their own checkout bag or straw.	Promotes reuse and waste reduction of non-plastic items.
Exemptions	If a customer returns a used plastic checkout bag to a business, it may be provided to another customer free of charge.	If a customer returns a used plastic checkout bag to a business, it may be provided to another customer free of charge.	If a customer returns a used plastic checkout bag to a business, it may be provided to another customer free of charge.	Promotes reuse of bags.
	Does not apply to bags used to a) Package loose bulk items such as fruit, vegetables, nuts, grains and candy; b) Package loose small hardware items such as nails and bolts; c) Contain or wrap frozen foods, meat, poultry, or fish, whether pre-packaged or not; d) Wrap flowers or potted plants;	Does not apply to small paper bags or plastic bags used to a) Package loose bulk items such as fruit, vegetables, nuts, grains and candy; b) Package loose small hardware items such as nails and bolts; c) Contain or wrap frozen foods, meat, poultry, or fish, whether pre-packaged or not; d) Wrap flowers or potted plants;	Does not apply to small paper bags or plastic bags used to i) Package loose bulk items such as fruit, vegetables, nuts, grains and candy; j) Package loose small hardware items such as nails and bolts; k) Contain or wrap frozen foods, meat, poultry, or fish, whether pre-packaged or not; l) Wrap flowers or potted plants;	



	<ul style="list-style-type: none"> <li>e) Protect prepared foods or bakery goods that are not pre-packaged;</li> <li>f) Contain prescription drugs received from a pharmacy;</li> <li>g) Transport live fish;</li> <li>h) Protect linens, bedding, or other similar large items that cannot easily fit in a reusable bag;</li> <li>i) Protect newspapers or other printed material intended to be left at the customer’s residence or place of business; and</li> <li>j) Protect clothes after professional laundering or dry cleaning.</li> </ul>	<ul style="list-style-type: none"> <li>e) Protect prepared foods or bakery goods that are not pre-packaged;</li> <li>f) Contain prescription drugs received from a pharmacy;</li> <li>g) Protect linens, bedding, or other similar large items that cannot easily fit in a reusable bag; and</li> <li>h) Protect clothes after professional laundering or dry cleaning.</li> </ul>	<ul style="list-style-type: none"> <li>m) Protect prepared foods or bakery goods that are not pre-packaged;</li> <li>n) Contain prescription drugs received from a pharmacy;</li> <li>o) Protect linens, bedding, or other similar large items that cannot easily fit in a reusable bag; and</li> <li>p) Protect clothes after professional laundering or dry cleaning.</li> </ul>	
	Does not limit the sale of bags or straws sold in packages of multiple items.	Does not limit the sale of bags or straws sold in packages of multiple items.	Does not limit the sale of bags or straws sold in packages of multiple items.	Allows for the sale of garbage bin liners for example.
Penalties	If a corporation, \$100-\$10,000 If an individual, \$50-\$500	If a corporation, \$100-\$10,000 If an individual, \$50-\$500	If a corporation, \$100-\$10,000 If an individual, \$50-\$500	

**Office of the Chair**

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File: 5360-06/CV

September , 2019

Sent via email only: [Plastics@gov.bc.ca](mailto:Plastics@gov.bc.ca)

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

Dear Minister:

**Re: BC Plastics Action Plan – Policy Consultation Paper**

I am writing in response to your request for feedback to the CleanBC Plastics Action Plan – Policy Consultation Paper. The impact of single-use plastics on the environment and water systems is well understood and documented, and we are pleased to see province-wide regulatory changes brought forward to reduce single-use plastic items. As a coastal community, the Comox Strathcona Waste Management (CSWM) service area is deeply connected to the natural environment economically, ecologically, socially and culturally. A reduction in plastic waste generated would create a healthier environment for the well-being of all local residents.

Our comments on the proposed actions in four connected areas are below.

**1. Bans on Single-Use Packaging**

Some of our member municipalities have enacted bans on single-use plastic carryout bags and straws, while others have not. This has created a patchwork of regulations across our service area and the province that will impact our ability to collectively reduce this harmful plastic waste. The CSWM Board is advocating for uniform regulations that would apply across the Province of British Columbia, for an initial phase of bans to regulate the sale or use of single-use plastic items for which viable alternatives exist and the implementation will not inhibit economic activity, such as:

- Carry-out bags
- Straws (with the exception of those needed for accessibility purposes)
- Polystyrene foam cups and take-out containers
- Eating utensils
- Drink stir-sticks

The implementation of a disposal ban, rather than a ban on sales could have the impact of pushing the cost of diversion on to taxpayers where an Extended Producer Program (EPR) program does not exist, does not cover the full cost of collection, or in a community that the EPR program deems it not necessary to service due to the remote location and low population.

Banning all take-out containers or take-out cups at this time would require a huge shift in the culture of our residents. Take-out cups may be best addressed through EPR, and more research on the presence of per- and polyfluoroalkyl substances (PFAS) in the alternative fibre based take-out containers is necessary at this time to prevent the contamination of organic compost streams from food scraps.

In addition to the exemptions considered in the City of Victoria's ban on plastic bags, our member municipalities also considered exemptions for the transport of live fish and to protect newspapers or other printed material intended to be left at the customer's residence or place of business.

## **2. More Recycling Options**

The CSWM Board supports the inclusion of packaging-like products such as re-usable plastic containers, freezer/sandwich bags, canning jars, wrapping paper, and moving boxes as it will reduce consumer confusion and challenges for CSWM staff. Plastic storage totes and boxes, including recycling bins are another material that can cause confusion and are perceived by the public as highly recyclable.

For small plastic items that are not well sorted at mechanical recycling facilities, and are often found in litter surveys such as straws, stir-sticks and cutlery we feel that a ban is the most effective option. Larger single-use items that are not necessarily packaging such as plates and bowls sold in multiples should be allowable within the Recycling Regulation to reduce consumer confusion. Plastic cups sold in multiples should be treated the same as other take-out drink containers.

Another area of expansion to reduce plastic waste within the EPR framework is the inclusion of industrial, commercial and institutional (ICI) printed paper and packaging. The main driver for participation by businesses in diversion is the cost of participation relative to disposal. As changes in global markets drive down the revenue potential of these diverted materials, and with high costs of hauling to recycling markets, the segregation and recycling of materials such as plastic containers, plastic film and expanded polystyrene are challenging to justify for many businesses. The segregated collection and diversion by the CSWM for these plastic materials is also cost prohibitive and options are currently only provided for ICI metal and cardboard recycling in most of our service area. Inclusion of ICI packaging, aligned with the Recycle BC materials currently accepted, into the Recycling Regulation would create efficiencies within the transportation network from remote communities and prevent landfilling of recyclables by the ICI sector.

## **3. Expanding Plastic Bottle and Beverage Container Returns**

The CSWM Board supports the proposed suggestion to expand the beverage container return program to include all beverage containers such as, milk, milk substitutes, and milk related products like energy drinks and caffeinated beverages. In addition, we would support the inclusion of other beverage containers such as hot and cold take-out cups currently included in the printed paper and packaging category, and the above mentioned plastic cups sold in multiples within the beverage container return program. Many residents want to recycle their take-out cups before reaching home, and are challenged by the lack of recycling opportunities in the public realm. Local governments and Recycle BC have made efforts to improve street-scape and parks recycling but contamination can be high, and servicing bins is costly. A return-to-retail supported program for take-out cups would improve accessibility and involve the businesses that create the waste stream in the management of the materials, and incentivize their involvement in promoting alternatives.

A uniform 10 cent deposit-refund for all beverage containers to improve recovery rates, and modifying the Recycling Regulation to allow for an alternative form of cash are positive steps-forward to modernizing a successful established program. A drop-and-go style system would serve our remote and seasonal communities well and could also be implemented in our existing depots to expand the services and offer a revenue stream for local charities.

#### 4. Reducing Plastics Overall

When considering the development of a national standard on recycled content the recyclability of the recycled plastic needs to be considered, it should not require a separate stream or segregation from other like plastics if possible. Another consideration to support recycled content would be requiring EPR programs to report on the amount of their waste material that was directly incorporated into making new products or packaging for their obligated materials.

With the initiatives being led by the federal government on an improvement to the standardization of EPR across Canada, the requirement for recyclable plastic packaging to have an identifiable mark or symbol on them that indicates acceptance in a curbside or depot program would be recommended. Historically, local governments often referred to the resin identification codes (numbers inside a mobius triangle) when communicating to residents if a plastic was acceptable or not. With EPR for packaging in BC residents can no longer use this as a reliable way to determine inclusion, and it causes a lot of frustration for staff and consumers. An example would be the green-dot mark used in Germany.

As it aligns with the BC Organic Matter Recycling Regulation, a standard on the marketing of “compostable/bio-degradable and oxo-degradeable” plastics within the province is recommended. Businesses try to meet the needs of their customers, and move away from plastics, which leads them to seek more “environmentally friendly alternatives” – which sometimes come with unintended consequences. Inclusion of compostable plastics within many approved composting technologies in the province will lead to contamination and operational challenges, and research should be done at the provincial level to support an appropriate path forward for these materials.

Recognizing that not all plastics are well suited for mechanical recycling, the Economic Study of the Canadian Plastic Industry, Markets and Waste (Deloitte, 2019) completed for the federal government indicated that chemical recycling of plastics from diverted and disposed waste is a piece of the puzzle in the expansion of plastics recycling from the current 9 per cent. The CSWM service has investigated options related to advanced technologies for waste management, and in particular plastics, and would recommend that the ministry reconsider the categorization of chemical recycling within the waste management hierarchy. Providing for the recovery of hard to recycle plastics through grant opportunities for advanced technologies to divert plastics from landfills would be supported by the CSWM Board.

Reducing single-use plastic items is vital for protecting our oceans, lakes, waterways and natural environment and appreciate your ministry taking a leadership role in this matter.

Yours sincerely,

Bob Wells  
Chair

Enclosure (if required)

cc: Gord Johns, MP, Courtenay-Alberni

## Appendix C – Plastic Bags and Straws Waste Stream Estimates

Detailed data is not available to calculate the potential impact of banning single-use bags and straws within our region, or even Canada, but a summary of estimates with best available data is provided below for context.

- Generated
  - Based on an estimate of 198 bags per person annually<sup>2</sup>, the CSWM population is consuming more than 23.7 million plastic bags per year.
  - Data on the consumption of straws is not readily available, the A&W Restaurant chain reported their switch to paper straws would result in a reduction of 82 million plastic straws per year, they are Canada’s second-largest hamburger chain<sup>3</sup>. That would equate to 265,000 straws per year by the CSWM population from just A&W restaurants.
- Recycled
  - 14 Recycle BC depots and retailers offer drop-off recycling opportunities for plastic bags.
  - The 9 CSWM Recycle BC depots accepted 15 tonnes of ‘soft plastics’ for recycling in 2018, this includes plastic carryout bags as well as bread bags, overwrap and other soft plastics.
  - Depots handled 561 Super Sacks<sup>®</sup> and 42 bales of soft plastic film.
  - No specific rate of recycling for our area for this material is available. In 2017 Recycle BC reported 20% of all ‘flexible plastics’<sup>4</sup> sold were recovered for recycling.
  - ‘Flexible plastics’ is a very broad category that includes soft plastics and crinkly plastic film packaging.
  - Plastic straws are not accepted for recycling.
- Disposed
  - A larger category of “flexible film plastic packaging” was evaluated in the CSWM 2017 Waste Audit, of which grocery and retail carry-out bags are included. This category comprised 1.62% of all waste, and 1.93% of waste excluding construction and demolition.
  - Based on a comparable Metro Vancouver waste audit<sup>5</sup>, plastic retail and grocery carry-out bags represent between 0.7-1.0% of the total waste stream excluding construction and demolition waste.
  - Within the 0.7-1.0% of bags disposed in the landfill, 50% - 77.7% were used for a secondary purpose before disposal such as bagging dog waste or as a kitchen catcher.<sup>5</sup>
- Littered
  - The European Union estimates 8% of carrier bags end up as litter.<sup>2</sup>
  - In the CSWM area that would equate to 1.9 million bags per year littered.
  - Plastic straws and stir sticks make up about 2% of shoreline litter in Vancouver<sup>6</sup>, and straws were the 9<sup>th</sup> most common item picked up in the 2018 Great Canadian Shoreline Cleanup.<sup>7</sup>

2. European Commission Memo, *Questions and answers on the proposal to reduce the consumption of plastic bags*, (Brussels, 2013)

3. Abedi, M. (2018, June 8). *A&W Canada set to ditch plastic straws at all locations*. Retrieved at <https://globalnews.ca/news/4263032/aw-canada-plastic-straws-ban/>

4. Recycle BC, *Packaging and Printed Paper Extended Producer Responsibility Plan*, (North Vancouver, 2018)

5. Tetra Tech for Metro Vancouver, *2016 Waste Composition Monitoring Program*, (Vancouver, 2016)

6. City of Vancouver, *Single-Use Item Reduction Strategy 2018-2025*, (June 5, 2018)

7. Ocean Wise, *Great Canadian Shoreline Cleanup 2018 Annual Report*, (2019)

<https://www.shorelinecleanup.ca/storage/resources/gcsc-2018annualreport-190416.pdf>

## Appendix D – Unintended Consequences

There can be unintended consequences of banning plastic bags, such as a sharp increase in paper bag and reusable bag consumption, or a move to compostable or biodegradable plastics.

Recognizing the unintended consequences of banning plastic bags, the City of Vancouver in their Zero Waste Strategy has proposed to allow businesses to be flexible in how they reduce single-use bags by requiring business license holders to have reduction plans for plastic and paper shopping bags, and to report the amount of bags they distribute each year to show improvement.

The positive outcomes of a ban on single-use plastic items are that fewer items would be consumed, reduced costs for recycling and or disposal in the landfill, and a reduction of plastic littering the environment. Replacing a single-use bag comprised of any material, paper or plastic, with a reusable bag or tote will achieve these results. However, these are only a few metrics to consider when evaluating ‘success’ with an initiative such as this.

For example, numerous Life Cycle Assessment’s (LCA) have been completed by government and industry and are a tool used to evaluate the environmental impacts of different carry-out bags. LCAs are a standardized methodology that takes into account the potential environmental impacts associated with resources necessary to produce, use and dispose the product, and also the potential emissions that may occur during its disposal. The results of these LCAs are not consistent on the specific quantifiable outcomes, but the trends and findings are aligned; a lightweight single-use plastic bag shows an overall lower environmental impact than either a paper bag, a reusable plastic bag or a cotton reusable bag.

Factors that weigh heavily though on the results of LCAs include the bag material, the volume and weight of the bag, and the production method. A durable cotton tote is quite heavy, and the production of cotton uses significant quantities of water, fertilizer and pesticides which results in a higher environmental impact as an example. The results of an LCA exclude littering however, and LCA methods are not currently able to assess the potential impacts on human health and ecosystems as a result of plastic dispersion in the environment due to litter. This is an emerging scientific field, but there is growing evidence of the harmful ingestion and accumulation of micro plastics in the marine environment, and this impact is not included in the published results.