9 December 2020

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RE: A proposed integrated management approach to plastic products to prevent waste and pollution

Recycling Council of Ontario (RCO) is a multi-stakeholder, not-for-profit organization committed to minimizing society's impact on the environment by eliminating waste. Members include municipalities, retailers, manufacturers, material management companies, brand owners, industry associations, schools, academics, and individuals. We are an independent organization that develops policy positions based on research, experience and unfettered discussion with stakeholders.

Policy positions are taken with a focus on environmental outcomes based on a hierarchy that prioritizes waste prevention, resource reutilization, and conservation. Our mission is to inform and educate all members of society about the generation of waste, the avoidance of waste, the more efficient use of resources, and the benefits and/or consequences of these activities.

Recommendations in Brief:

- Set a national plastic waste reduction and recycling target for Canada.
- Create a national registry that is capable of tracking plastic production, sales, and end of life management.
- Ensure that information and data collected through the registry is shared publicly to all
- interested and affected stakeholders.
- Ban packaging and products from sale as they are set out in the discussion paper; designed for single use; difficult to manage through recycling or composting applications; and where market alternatives exist to support avoidance, reuse, or improved recycling or composting options.
- Expand the list of banned single-use plastics where there is evidence that they are found in the environment, are often not recycled, and have readily available alternatives.
- Under the *Canadian Environmental Protection Act* mandate the use of PCR content for plastics in the manufacturing of new products.
- Set a 50 per cent minimum baseline by 2030 and use an economy-wide approach for its implementation.
- Develop a national strategy to guide PCR implementation and work with a cross-section of stakeholders and jurisdictions to identify priority sectors and/or products; develop use standards and specifications; and identify verification processes and protocols.

- Create a national reporting repository to track adoption and impacts, and make all related information accessible for public consumption.
- Government of Canada should leverage its leadership position and buying power to advance all policy objectives outlined in the discussion paper starting in 2021.
- Increase PCR content, ban single-use items, and ensure responsible end of life management by implementing circular procurement practices.
- Use convening powers to coalesce governments at all levels and develop a circular procurement strategy that targets the elimination of plastic waste.
- Create a set of national standards to support effective provincial and territorial circular procurement policies and practices.
- Create national standards, based on best practices, that include standardization for regulatory scope; regulatory terms and definitions; performance targets; and reporting protocols that guides implementation and expands EPR policies across Canada.
- Utilize the national registry for plastics production and end of life management to track all advancements in EPR regulations applied to products and packaging that contain plastic.
- Dismiss outright any form of incineration, thermal treatment, or energy-from-waste as an acceptable approach to support and advance a circular plastics economy for Canada.

Recommendations in Full

On behalf of RCO I would like to commend the Government of Canada for prioritizing plastic waste, and engaging with stakeholders to solicit feedback on an integrated management approach to plastic products to prevent waste and pollution. Plastic waste is a serious global threat to environmental and human health, and the Government of Canada is taking much-needed and long overdue action on pervasive waste stream at an opportune time.

The initiatives and ideas outlined in the integrated management approach to eliminate plastic pollution are critical to the economic, environmental, and social well-being of Canada, and should be put into motion starting in 2021. There is also prodigious support throughout the country to create and implement solutions to plastic waste from global and national corporations, small- and medium-sized enterprises, provincial and municipal governments, First Nations, non-profits and charities, and individuals.

As we know, plastic, with its broad utility and application, is used in virtually every product and sector. However, the economic, environmental, and social consequences and costs associated with plastic waste is a global threat recognized by the majority of national governments. The low cost of producing virgin plastic resin and the high cost of diverting plastic from disposal to recycling applications disincentivizes and demotivates market investments and innovations.

Currently, without financial subsidy or regulation, plastic waste retains its chronically low value, exacerbated by Canada's generally low cost of disposal. Consequently more than 90 per cent of plastics produced and sold are lost to disposal and the environment.[1]

[1] *Economic Study of the Canadian Plastic Industry, Markets and Waste*. September 2019

While efforts are being made to improve data and information regarding the amount of plastics supplied into Canada's markets and ultimately its management at end of life – which leads to significant economic loss and environmental costs – these are unco-ordinated and incomprehensive. This makes it difficult for governments to take concerted action and industry to make investments that would improve market conditions and lift the value of plastic discards.

While there have been some investments made by Canadian municipalities to improve collection of some plastic waste, particularly for packaging, local processing is still limited. Plastic recycling markets heavily rely on regulatory interventions, such as extended producer responsibility (EPR) policy, that exists in many provinces and territories. While EPR is a crucial mechanism to support investments to expand collection and local processing it is largely applied provincially, and scoped predominantly to packaging and electronics. There is no EPR, nor any other waste reduction regulation in Canada, for other sectors where plastic is used heavily, such as automotive and construction sectors.

There are also a variety of factors that lead to plastic waste and, therefore, require corresponding actions to address it. Solutions to plastic waste are embedded in Canada's ability to accelerate its transition from a linear model of consumption and production – take-make-waste – to a circular economy. Plastics in a circular economy are produced and utilized in order to increase their value by addressing need; creating demand for improved product designs and business delivery systems; and improving end of life management to support reintegration into production.

The following comments outline actions necessary to holistically reduce plastic waste in Canada and are offered in response to the discussion paper.

National Plastic Waste Reduction and Recycling Target

Setting plastic waste reduction and recycling targets for Canada is pivotal to support objectives tied to publicly stated commitments. Targets are central to measure and track progress on plastic waste, and adds important context to harmonizing efforts of governments, industry, and civil society. Given the diversity of use for plastics, and ultimately what makes up plastic waste streams, tracking and reporting on all of the activities in each targeted product sector is essential to providing context to objectives and facilitating collaboration between sectors.

A national target also requires the creation of a domestic data and information registry that will track progress toward objectives, and fill existing data gaps to inform new policy supports and investments.

Recommendations:

> *Set a national plastic waste reduction and recycling target for Canada.*
>
> *Create a national registry that is capable of tracking plastic production, sales, and end of life management.*

Ensure that information and data collected through the registry is shared publicly to all interested and affected stakeholders.

Single-Use Plastic Bans

In the discussion paper the Government of Canada identified products and packaging that are designed or intended for single use that are commonly found in disposal and litter streams; difficult to collect and recycle; and have inherently low market value for recyclers. Bans from sale are an effective and necessary regulatory approach to single-use plastics and products where market alternatives are available to avoid their use, that support reuse, and improve recycling or composting outcomes.

The six items included for an initial ban – straws, stir sticks, six-pack rings, cutlery, checkout bags, and food packaging and service ware made from problematic plastics – are justified and should be put into place in 2021. The list should be continually expanded to include additional items according to established criteria and where evidence supports it.

Banning items that have limited management options also aligns with the approach of other progressive jurisdictions.

Recommendations:

Ban packaging and products from sale as they are set out in the discussion paper; designed for single use; difficult to manage through recycling or composting applications; and where market alternatives exist to support avoidance, reuse, or improved recycling or composting options.

Expand the list of banned single-use plastics where there is evidence that they are found in the environment, are often not recycled, and have readily available alternatives.

Post-Consumer Recycled Content

The underutilization of recycled materials as part of the production of new products and packaging is directly influenced by the low cost of virgin plastic and high cost of collecting and processing plastic discards for manufacturing. Where plastic recycling in Canada succeeds is predominantly due to municipal governments that provide taxpayer subsidized collection and sorting.

A central tenet to improve current market conditions and the value of plastic discards is increasing its reintegration into production cycles. Growing the use of post-consumer recycled (PCR) plastics is a critical measure found in the European Green Deal, and is becoming a more common commitment of global brands in the consumer goods, information technology, and automotive sectors. Requiring use of PCR plastic through circular public procurement and circular supply chain specifications increases demand and, therefore, value of recycled plastic materials that in turn creates incentive for improved collection and processing.

Creating new demand will bring about new investments throughout supply and value chains; reduce reliance on virgin plastic inputs; avoid the environmental impacts of its production; and create favourable and stable market dynamics to nurture the domestic plastic recycling sector.

In order to accelerate and support effective integration of PCR content, markets also require standards that can inform procurement and supply chain specifications. Standardized specifications provide important benchmarks for buyers and sellers. Verification criteria protocols, and processes ensure fairness and transparency in the marketplace.

Recommendations:

> *Under the* Canadian Environmental Protection Act *mandate the use of PCR content for plastics in the manufacturing of new products.*
>
> *Set a 50 per cent minimum baseline by 2030 and use an economy-wide approach for its implementation.*
>
> *Develop a national strategy to guide PCR implementation and work with a cross-section of stakeholders and jurisdictions to identify priority sectors and/or products; develop use standards and specifications; and identify verification processes and protocols.*
>
> *Create a national reporting repository to track adoption and impacts, and make all related information accessible for public consumption.*

Circular Public Procurement

Government spending in Canada also represents 20 per cent of the country's Gross Domestic Product. Through buying power the Government of Canada possesses significant leverage to lead the transition from a linear to circular plastics economy. Through greening government initiatives, departments have successfully collaborated internally and externally with suppliers and vendors to meet its greenhouse gas (GHG) emission reduction targets, which demonstrates the ability and influence of public procurement.

Through this same mechanism and process the Government of Canada can identify priority areas; leverage its buying power to incent improved product development, alternative product use, or environmentally superior business delivery systems or models; and extend supplier responsibility to fulfill plastic waste reduction objectives and commitments. By using its leadership position, the federal government can also transfer and co-ordinate similar procurement changes to provincial and municipal counterparts.

By using procurement as a lever governments can advance objectives outlined in the discussion paper and other public commitments, including the simultaneous increase of PCR plastic to replace virgin plastic, ban of single-use items, and responsible end of life management.

Recommendations:

> *Government of Canada should leverage its leadership position and buying power to advance all policy objectives outlined in the discussion paper starting in 2021.*

Increase PCR content, ban single-use items, and ensure responsible end of life management by implementing circular procurement practices.

Use convening powers to coalesce governments at all levels and develop a circular procurement strategy that targets the elimination of plastic waste.

Create a set of national standards to support effective provincial and territorial circular procurement policies and practices.

Extended Producer Responsibility

EPR is a cornerstone policy to improve waste reduction objectives. While many provincial jurisdictions have adopted it, the scope and design varies. This patchwork approach and lack of co-ordination causes a disparity in performance; lack of clarity on definitions; inconsistency in market investments and material values; administrative burden for obligated parties, in particular producers that operate in multiple jurisdictions; and inability to compare and contrast effectiveness between jurisdictions.

The proposal to expand use of EPR as a policy tool and standardize regulations at provincial and territorial levels to further a national goal to reduce plastic waste is essential.

Recommendations:

> *Create national standards, based on best practices, that include standardization for regulatory scope; regulatory terms and definitions; performance targets; and reporting protocols that guides implementation and expands EPR policies across Canada.*
>
> *Utilize the national registry for plastics production and end of life management to track all advancements in EPR regulations applied to products and packaging that contain plastic.*

Thermal Treatment and Energy-from-Waste

Thermal treatment and energy-from-waste facilities require a constant stream of material to burn, and competes with the recycling industry that depends on the availability of the same feedstock. Furthermore, these applications maintain a linear approach to resource efficiency by taking fossil fuels used to create virgin plastic and completely remove its value by incapacitating the reintroduction of plastic waste into the economy as PCR.

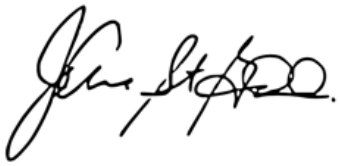
Converting plastic waste into energy does nothing to reduce demand for new plastic products, and impedes expansion and success of a viable domestic recycling industry.

Recommendation:

> *Dismiss outright any form of incineration, thermal treatment, or energy-from-waste as an acceptable approach to support and advance a circular plastics economy for Canada.*

Thank you for your consideration of these recommendations, and we are pleased to discuss the contents of this submission at your convenience.

Yours Sincerely,



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