



June 30, 2022

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Ministry of Environment and Climate Change Strategy
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Re: Preventing Single-use and Plastic Waste in British Columbia – Intentions Paper

Dear Ms. Nash,

I am writing to you today on behalf of the members of the Alberta Plastics Recycling Association (APRA). APRA is a not-for-profit association that has operated for 31 years, with a focus on the facilitation of sustainable plastics recycling and the diversion of plastics from landfill. Our members include participants in the full plastics value chain, including resin manufacturers, companies involved in manufacturing plastic products, as well as processors and recyclers of plastics. APRA and its members and partners are committed to finding solutions to manage and recycle plastics and to realize the value of the circular economy and keep plastics out of the environment.

Thank you for providing the opportunity for APRA to respond to the Government of British Columbia's [Preventing Single-use and Plastic Waste in British Columbia](#) intentions paper, published on April 22, 2022. Many of our members conduct business in the Province of British Columbia, thus our interest in responding to this to this paper.

APRA supports many of the comments from our colleague the *Chemical Industry Association of Canada (CIAC)* in their response to this discussion document, dated June 17, 2022. We emphasize key aspects in our comments below. APRA believes that it is important that the mind-set is shifted from single use to reuse to enable post-consumer plastics to be transformed into an ongoing resource in a circular economy.

[Investment in Plastics Recycling Innovation and Infrastructure](#)

Today in Canada, only nine percent of all post-consumer plastics are recycled due to a multiplicity of unharmonized recycling systems, inadequate access to collection and sorting, limited adoption of mechanical and advanced recycling technologies, and few end-markets for recycled plastics.

Even with the success of the province's Extended Producer Responsibility (EPR) program achieving a 52 percent recycling rate, B.C. still has a significant infrastructure capacity gap for recycling, as well as outdated recycling technologies and insufficient infrastructure to address ever-increasing demand. However, B.C. also has the unique opportunity to capitalize on the leadership it has already demonstrated through its EPR program. Rather than banning plastics that currently have low recycling rates, B.C. has

the opportunity to increase the recycle rate of those items through specific incorporation in the EPR program and to invest in advanced recycling opportunities in British Columbia.

Strengthening the EPR program rather than weakening it through bans, would position the province as a regional recycling hub capitalizing on access to post-consumer and post-industrial plastics from the U.S, leading to significant market expansion and greater market efficiencies, scale, and feedstock for innovative advanced recycling technologies.

Recommendation 1: British Columbia should not ban the items specified in the Intentions paper, instead include them in the provincial Extended Producer Responsibility programs ('blue box' programs) and incent clear provincial action and industry solutions to sustainably manage post-use of plastic items.

Innovative Technologies/Processes Already Exist to Effectively Manage Many Items Identified

The intentions paper identified priority items requiring action, in part, based on their ability to be effectively recycled or composted throughout B.C. In our view the approach taken only considered infrastructure currently deployed in B.C., rather than considering the existing technology innovations available, but not yet deployed in the province, to effectively manage recycling of these products. By supporting investment in recycling innovation and infrastructure a circular economy can be achieved. We provide comments on the following products specifically noted in the proposal.

Checkout Bags

APRA has concerns relating to the section on checkout bags. In our opinion the definition of reusable is not based on science and will not deliver better environmental outcomes than the single-use checkout bags they will replace. Additionally, the definition provided for plastic checkout bags includes all "plastic film". Plastic film is used for many products that can meet a range of performance criteria. There is no reason to exclude this material from meeting the re-usability goal that the Intentions Paper outlines.

The Intentions Paper also fails to account for secondary uses of checkout bags. Canadian studies¹ show that plastic checkout bags are not single use and have high re-use and recycle rates. Provincial Extended Producer Responsibility programs have recycling targets that will lead to improved recycling rates.

Problematic Plastic Food Packaging

Polystyrene is one of the most recyclable materials, either through mechanical recycling or through advanced recycling, which turns it into a monomer that can be reused repeatedly. Over the last decade, companies in Canada and the US such as Pyrowave, Polystyvert, Agilyx, and others have developed a circular economy for polystyrene. Increased collection, densification and technology advances have addressed past issues with the economics and logistics around polystyrene recycling. Recycled polystyrene is in high demand, and has a multitude of applications, including food and non-food packaging, durable goods, and insulation and construction materials.

A circular economy of polystyrene is already in being demonstrated in Québec where the demand for recycled polystyrene is estimated at 55 to 60 million pounds per year. It could reach up to 110 million pounds per year, within three years. In the absence of systematic collection of polystyrene in Canada,

¹ City of Toronto 2010/2011 Waste Audit.

companies must turn to the United States and South America to meet the demand for recycled polystyrene. Thus, it is not the material that is value-recovery problematic but rather the absence of insufficient local collection and sortation practices.

Recommendation 2: The Government should not ban products that are re-usable or recyclable and where processes, materials, and technologies are available that move us towards the goal of a circular economy (e.g., plastic checkout bags, aerobic and anaerobic compostable plastic products, polystyrene items, items that can be recycled through advanced recycling technologies).

Undermining B.C.'s Extended Producer Responsibility Program

In our view the proposed bans identified in the intentions paper serve to undermine the robust nation-leading EPR program in the province and is counter to the tenets of a circular economy. A circular economy, that has a world leading EPR program at its foundation will capture the inherent value of post-consumer plastics, without differentiation between single use and multi-use or durable applications.

Banning plastic products is counterproductive and undermines the significant investments that both industry and governments have put in place to develop and improve the technologies and systems to recycle plastics as well as build end-markets for the use of recycled plastic content. Bans, like those proposed, will challenge investment in innovative recycling technologies which are critical to advancing a circular economy and will remove value from Blue Box systems at a time when industry is taking action to effectively manage those systems.

Governments should be promoting the expansion of reuse, recycling, and recovery, the integration and development of end-markets, and investments in innovative infrastructure and projects to achieve a circular economy for plastics.

APRA does not support regulatory duplication as it creates inefficiencies and confusion, not only for the regulated entity, but also the regulating authorities. As such the duplication of pending federal regulation on single-use plastics and recycled content mandates only adds administrative burden without any increase in environmental benefit. Furthermore, by continuing to encourage municipalities to implement their own regulations on single-use and plastic items, B.C. is further eroding and undermining the EPR program and impeding the development of a circular economy for plastics.

Recommendation 3: Promote the expansion of reuse, recycling, and recovery, the integration and development of end-markets, and investments in innovative infrastructure and projects to achieve a circular economy for plastics.

Need For Life-Cycle Assessment of Alternatives

There are several considerations that need to be assessed before proceeding with alternative materials to plastics. The intentions paper does not consider, from a life-cycle perspective, the environmental costs of alternatives that would be selected in the event plastic products are banned.

Studies have shown that the environmental cost of using plastic in consumer goods is less than alternative materials. A life-cycle assessment of plastic products would ensure that both the societal costs of mismanaged plastic products and benefits of plastics are evaluated and compared to alternatives, helping avoid regrettable situations where alternatives selected have a larger overall environmental footprint.

Recommendation 4: Advance studies necessary to better understand the full lifecycle impact of single-use plastics and their alternatives.

CONCLUSION

APRA and its members and partners are committed to finding solutions to manage and recycle plastics and to realize the value of the circular economy and keep plastics out of the environment.

Thank you for the opportunity to share this response. We remain committed to ongoing collaboration as we work to build a sustainable future for plastics, and we would be happy to meet with you to continue the discussion.

Sincerely,

A handwritten signature in black ink that reads "Wendy Wright". The signature is written in a cursive, flowing style.

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