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December 8, 2020

Dany Drouin
Director General
Plastics and Waste Management Directorate
Environment and Climate Change Canada
351, boul. Saint-Joseph, 9th Floor
Gatineau, Quebec K1A 0H3

Re: Discussion Paper on a Proposed Integrated Management Approach to Plastic Products to Prevent Waste and Pollution

Dear Mr. Drouin:

The Region of Peel welcomes the federal government's commitment to prioritize the reduction of plastic pollution and appreciates the opportunity to provide comments on the Proposed Integrated Management Approach to Plastic Products to Prevent Waste and Pollution. The comments attached to this letter are provided by the Region as input into the development of the proposed approach.

The Region is interested in continuing to engage with the federal government as it finalizes the integrated management approach to plastic products and welcomes opportunities for ongoing dialogue.

Sincerely,

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Proposed Integrated Management Approach to Plastic Products

**Submission to Environment and Climate Change Canada
on a Proposed Integrated Management Approach to Plastic Products to
Prevent Waste and Pollution**

Regional Municipality of Peel

December 8, 2020

The Region of Peel appreciates the opportunity to provide feedback on the Discussion Paper: a proposed integrated management approach to plastic products to prevent waste and pollution, and is pleased to continue to be an engaged stakeholder in the implementation of the *Strategy on Zero Plastic Waste (2018)* and transition to a circular economy where reduction, reuse, and repair are prioritized and materials stay in the economy and out of landfills and the environment.

In general, the Region of Peel welcomes the overall intent of the proposed integrated management approach to plastic products, as collective action is a necessary and important step towards zero plastic waste and a circular economy. The following comments and constructive suggestions are submitted for your consideration as you develop the integrated management approach to plastic products. These comments will be presented to Peel's Regional Council for endorsement and if there any amendments to these comments made by Council, they will be forwarded to you as soon as possible.

Proposed Management Framework for Plastics

The Region of Peel (Region) has established and implemented programs to reduce waste generation and increase resource recovery. However, one of the most significant challenges that we face today is the recycling of plastic and plastic composite products and packaging. Plastic products and packaging are becoming more difficult to manage at the end-of-life. To make matters worse, messages from manufacturers and producers often confuse consumers about the recyclability of their products and packaging resulting in municipalities carrying the costs of managing these materials in their waste streams.

The Region is pleased that the federal government is taking an evidence-based structured approach to reduce plastic waste and keep it out of the environment. In finalizing the proposed management framework, the Region recommends including consideration of:

- Availability and sustainability of end-markets.
- Environmental footprint of existing or innovative alternatives.
- Quantity of products and packaging being generated and prioritizing products and packaging that have the highest quantities.
- Whether the costs of monitoring, enforcement and market development are proportional to the benefits of a ban or restriction of a plastic product or packaging.

- Refining the definitions of recyclable, compostable, and biodegradable based on municipal processing capabilities that are in practice and at scale.

Compostable and Biodegradable Alternatives for Single-Use Products

The Region does not support the consideration of compostable or biodegradable plastics as alternatives to single-use plastic products until proven technologies are in place to compost them and producer responsibility programs are in place to fund their end of life management. These items are not compatible with existing composting infrastructure; they add unnecessary and significant costs to municipal composting programs; and can degrade the value and quality of produced or recovered materials.

Encouraging the use of compostable or biodegradable products as an alternative or as an exemption for single-use plastic products does not address the root causes of plastic pollution; rather it merely replaces one form of disposable product for another. The federal government should promote the use of reusable or recyclable products as alternatives to single-use plastic products.

If compostable or biodegradable alternatives are in fact the best evidence based option for a particular single-use plastic product, it is imperative that the conditions under which the item is compostable or biodegradable (industrial or home composting) are clearly and legibly written on the packaging or in a document accompanying the item. The Region urges the development of national standards or a certification program for compostable and biodegradable products and packaging that is in line with municipal processing capabilities in practice and at scale. Further, the federal government should invest in waste management infrastructure to ensure consistency and capacity for municipal governments to accept more of these types of materials.

Single-Use Plastic Bans

The Region supports the proposal to ban harmful single-use plastic items, and not through a phased in approach, including plastic checkout bags, stir sticks, six-pack rings, cutlery, straws, food service ware made from problematic plastics. The Region recommends consultation on any future bans.

The Region understands the need to accommodate accessibility through exemptions and recommends that exemptions within the framework be subject to time limitations enabling the review of any new available alternatives or innovations.

Recycled Content

The Region supports the development of minimum recycled content targets as it signals a commitment to promoting recycling, improving quality and efficiency, and increasing capacity by stimulating increased investment in recycling infrastructure while reducing the use of primary raw materials.

As one of the largest municipal recyclers in Ontario, the Region appreciates the importance of a viable end-market for recyclable materials and is encouraged by the proposal of minimum recycled content targets for plastic products. The driver needs to be the optimization of the value of recycled materials through clean high value material streams in order to ensure market demand for collected materials. The federal government should:

- Set high and enforceable minimum recycled content targets by resin type (PET, HDPE, PVC, LDPE, PP, PS) that are ever increasing until the product is made of 100% recycled content.
- Set minimum recycled content targets at each stage of the plastics life cycle encouraging circular design, improved collection and recycling systems, and expanded markets for recycled materials.
- Consult with industry stakeholders to establish the best minimum recycled content target to make a meaningful impact on secondary markets.
- Develop a monitoring and enforcement system to verify compliance and ensure manufacturers are integrating recycled content into their new plastic products and packaging.

Procurement is a strong stimulus to the growth of domestic end-markets. Government procurement of recycled content will play a key role in the ability to reach targets. The Region recommends establishing a circular procurement community of practice to enable all levels of government to include recycled content considerations as part of their procurement practices.

Further, it is important to note that recycled content targets are one piece of the puzzle. The federal government should consider how consumer behaviour, collection and recycling infrastructure, and business model redesign (i.e. service, sharing, reuse) play a role in the solution.

Extended Producer Responsibility

The Region is a strong proponent of extended producer responsibility (EPR) and has advocated for the implementation of EPR provincially and nationally. Central to the proposed integrated management approach should be the implementation of a national harmonized EPR framework with a focus on individual producer responsibility. This is essential to deliver the investment that is needed in the current recycling infrastructure to grow the quality and value of recycled materials and incentivize the use of recycled content in plastics products and packaging.

The Region's experience in the transition and implementation of EPR in Ontario has revealed the need for a more comprehensive approach. To ensure EPR systems are comprehensive, consistent and transparent, the federal government should provide guidelines or principles on the following:

- Designation of a broad range of materials including compostable and biodegradable products and packaging. Consideration should also be given to designating durable bulky plastics such as toys, kiddie pools and baskets which are extensively found in municipal systems and difficult to manage.
- Inclusion of Industrial, Commercial and Institutional (IC&I) and other sources, such as long-term care facilities, childcare facilities, public spaces, schools, parks, and municipal buildings (community centres, libraries) that generate similar materials to residences.
- Establishment of aggressive collection and management targets that increase progressively over time.
- Continued improvement of services through accessibility standards and provisions to expand accessibility and ensure increase in service levels.
- Implementation of a robust monitoring and enforcement system to ensure compliance including the creation of an oversight body and development of administrative penalties.
- Flexibility to adapt to local conditions.

Canada's Leadership Role to Reduce Plastic Waste

To make a circular economy a reality in Canada, the federal government should take bold action, invest in infrastructure and innovation, and meaningfully engage with all stakeholders through collaborative forums.

The federal government can show leadership in this regard by:

- Establishing and enforcing high targets for the reduction of virgin plastics, reuse, recycling, and recycled content both for the manufacturing of domestic and exported plastic products to support Canada's transition to a circular economy.
- Setting deadlines for the implementation of EPR in provinces and territories that have not yet introduced an EPR a system.
- Considering final direction taken with the integrated management approach as the minimum bar and reviewing the approach regularly, in consultation with stakeholders, to progressively increase targets.

The Region of Peel would like to see the Government of Canada lead the way, commit to a circular economy, and set an example for other countries to follow. We are prepared to work collaboratively with Environment and Climate Change Canada, the Plastics and Waste Management Directorate, and other stakeholders as we continue to support the federal government's efforts to keep plastic within the economy and out of disposal and the environment.

For any questions regarding the Region's submission or for more information, please contact:

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