



Public Works

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February 24, 2022

Tracey Spack

Director, Plastics Regulatory Affairs Division

Environment and Climate Change Canada

351 St. Joseph Blvd., Place Vincent Massey, 9-064

Gatineau, Quebec K1A 0H3

Dear Ms. Spack:

Re: Proposed Single-Use Plastics Prohibition Regulation, Regulatory Impact Analysis Statement in the Canada Gazette, Part I, December 25, 2021 and Draft Guidance for Selecting Alternatives to the Single-Use Plastics in the proposed Single-use Plastics Prohibition Regulations

The Region of Peel appreciates the opportunity to provide feedback on the Proposed Single-Use Plastics Prohibition Regulation, Regulatory Impact Analysis Statement in the Canada Gazette, Part I, December 25, 2021 and Draft Guidance for Selecting Alternatives to the Single-Use Plastics in the proposed Single-use Plastics Prohibition Regulations.

Overall, the Region of Peel supports the proposed Single-Use Plastics Prohibition Regulation banning six harmful single-use plastic items as it is a necessary and important step towards achieving zero plastic waste and a circular economy. The following comments and constructive suggestions are submitted for your consideration as you finalize the regulation and guidance document. These comments will be presented to Peel's Regional Council for endorsement and if there are any amendments to these comments made by Council, they will be forwarded to you as soon as possible.

General Comments

Managing Compostable Alternatives

The Region does not support the promotion 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. Furthermore, national standards should be developed for compostable and biodegradable plastics, so all actors have the same understanding of what is and is not compostable or biodegradable. Municipal composting infrastructure was not designed to manage items labelled as compostable and biodegradable. These items add unnecessary and significant costs to municipal composting programs and can degrade the value and quality of produced or recovered materials. If compostable or biodegradable alternatives are 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



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(industrial or home composting) are clearly and legibly written on the packaging or in a document accompanying the item.

Recommendation 1: 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.

Recommendation 2: The Region strongly recommends funding support for investment in waste management infrastructure to ensure consistency and capacity for municipal governments to accept more compostable or biodegradable alternatives within their composting programs.

Ban Additional Items

The Region supports the six items included in the proposed prohibition regulation: plastic checkout bags, stir sticks, six-pack rings, cutlery, straws, food service ware made from problematic plastics. However, it is important for this list to be expanded with more single-use plastic items, where evidence supports it, as it is insufficient to achieve zero plastic waste by 2030.

Recommendation 3: The Region recommends that the list of banned items be continually expanded to include additional harmful single-use plastic items based on evidence and that consultations be held on future bans.

Comments on the Proposed Single-Use Plastics Prohibition Regulation, Regulatory Impact Analysis Statement in the Canada Gazette, Part I, December 25, 2021

Definitions

The current definitions focus on the proposed six single-use plastic items to be banned. However, the Regulatory Impact Analysis Statement states that the non-conventional plastics such as compostable or biodegradable options will be treated the same as conventional plastics under the regulation.

Recommendation 4: The Region recommends including a definition of single-use plastic alternatives that are covered under the regulation, such as compostable or biodegradable.

Exemptions

The Region understands the need to accommodate accessibility through exemptions, however as technology advances so do options for accessible single-use plastic alternatives.

Recommendation 5: The Region recommends that exemptions be subject to time limitations enabling the review of any new available alternatives or innovations.



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Record Keeping and Reporting

The federal government could leverage existing reporting databases or develop a centralized database in alignment with producer responsibility reporting requirements to reduce administrative burdens on affected parties.

Recommendation 6: The Region recommends exploring the potential to align with existing Extended Producers Responsibility requirements and reporting mechanisms where available.

Comments on the Draft Guidance for Selecting Alternatives to the Single-Use Plastics in the proposed Single-use Plastics Prohibition Regulations

The Region appreciates that businesses will be encouraged to check with local recycling and composting facilities to see if their alternative of choice is indeed recyclable or compostable. However, many businesses will only check when compelled to. Others may check but ignore the advice of the local service provider. In these instances, the items will either become contamination in the recycling or compost or simply end up in the garbage.

Recommendation 7: The Region recommends strengthening the wording from encourage to shall so that all businesses ensure their alternative of choice is recyclable or compostable with the local service provider before it is implemented.

The Region of Peel looks forward to continued engagement with Environment and Climate Change Canada as we continue to support the federal government's efforts to keep plastic within the economy and out of disposal and the environment.

Regards,

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