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INSPIRING CHANGE

August 27, 2018
Canadian Council of Ministers of the Environment
360-123 Main Street
Winnipeg, MB R3C 1A3

RE: CCME Draft Framework for Zero Plastic Waste

Environmental Defence is pleased to provide comments on *CCME Draft Framework for Zero Plastic Waste*. Thank you for taking this step to address the growing issue of plastic pollution in Canada.

In June of this year, Environmental Defence, along with more than 40 other environmental and civil society groups, released [Towards a Zero Plastic Waste Canada](#) – a declaration challenging the federal government to work with provinces, territories, municipalities and indigenous governments to ensure Canada achieves a zero-plastic-waste future by 2025. The declaration includes 18 priority actions, and will guide our evaluation of the CCME’s proposed framework for Zero Plastic Waste.

Engagement questions:

1. Framework –

While we agree in broad strokes that the framework captures the essential systems necessary to achieve zero plastic waste (prevention, collection & clean-up, value recovery), the specific actions within each system will determine the overall effectiveness of the framework. For example, “Prevention” must include overall reduction in the use of plastics – especially unnecessary uses. It should also include commitments to phasing out plastics and additives that are harmful, or challenging to reuse/refurbish, recycle or compost.

We are also concerned about the inclusion of Energy Recovery within the “Value Recovery” system. To ensure that Energy Recovery doesn’t become the default method of value recovery, we recommend that the CCME adopt the same position as Ontario: although energy from waste and alternative fuels are permitted as waste management options, these methods do not count towards diversion or recycling. Allowing Energy Recovery as a means of achieving diversion or recycling targets is inconsistent with a circular

economy, as materials that are incinerated are no longer available to manufacture new goods. That means new plastics would need to be manufactured from virgin resources, continuing the current linear economy.

Besides the proposed systems, the framework should include other key pieces to support a level of policy harmonization at the federal level. For example, the framework should establish consistent definitions, standards and measurement protocols, including definitions for circular economy, resource recovery, waste diversion, recycling, and Extended Producer Responsibility. It must also establish protocols for tracking and measuring progress toward targets and performance standards.

It's also essential that the framework itself includes a national plastic recycling target, and a national recycled content standard for single-use plastics. We propose: 100 per cent of single-use plastics are collected at end-of-life, and at least 85 per cent are diverted from landfill and incineration by 2025; a 75 per cent recycled content standard for single-use plastics. Recycling and recycled content targets and standards should be legally binding to ensure every possible action is taken to achieve them.

2. Priority action areas –

Once again, the effectiveness of the priority action areas, and whether they will achieve the targets in the Ocean Plastics Charter, will depend on the specific actions taken. While the draft framework references several actions we support and outlined in our declaration, they are described as only possible or potential avenues of action.

We believe that to be successful, the following actions must be taken:

1. Bans on plastics and additives that harmful, or challenging to recycle, reuse, remanufacture or compost
2. Enforceable Extended Producer Responsibility (EPR) legislation that makes companies financially and operationally responsible for collecting and recycling the materials they put on the market, and for reducing their resource consumption (full EPR)
3. Establishing a national recycling target to ensure 100 per cent of single-use plastics are captured and at least 85 per cent are recycled by 2025
4. Establishing a national 75 per cent recycled content standard for single-use plastics

5. Product performance standards for innovative materials and alternative feedstocks must be established, where evidence clearly shows they are more sustainable
6. The export of poorly sorted plastic waste must be phased-out
7. Incentives to reduce waste, and increase reusability of products and packaging, and investments into alternative delivery systems and reuse models
8. Build circularity into governments' procurement policies, requiring that vendors provide closed-loop solutions as part of providing goods and services; that products and packaging used by government contain 75 per cent recycled content; and, that government offices and buildings achieve an 85 per cent recycling target for single-use plastics.

Further to the above, we urge the federal government to follow the example of microbeads, and take priority steps to declare problematic plastics (such as single-use plastics, microfibers, and other microplastics) toxic under the Canadian Environmental Protection Act (CEPA), and take preventative action to minimize environmental and human health risk by 2020.

We encourage you to review our full declaration: [*Towards a Zero Plastic Waste Canada*](#) at www.environmentaldefence.ca/plasticsdeclaration, and in Appendix A.

3. Opportunities and Challenges –

Canada lacks a comprehensive, overarching plastic waste strategy. And it shows. Less than 11 per cent of all plastics are recycled in Canada.

- Provinces and territories are responsible for establishing waste reduction policies and programs, but there is no accountability to ensure they reach targets or achieve outcomes.
- Municipal governments often manage the collection, recycling, composting and disposal of household waste, but at a huge cost to taxpayers, and with no ability to influence the materials producers are putting into the market.
- Industrial, commercial, and institutional (IC&I) properties mostly manage their waste separately through private contracts with waste haulers and recycling/disposal companies. A lack of regulated performance standards and reporting requirements means there is little motivation for improvement.

Also problematic is that in many cases, recycling is simply a pit-stop on the way to the landfill, or incinerator. The polyethylene terephthalate (PET) industry has lauded the transformation of plastic bottles into performance fleece as a roaring success for waste diversion, but huge quantities of textiles end up in landfills every year. And we've recently discovered that before they get there, these fabrics shed millions of microfibers into our rivers, lakes and oceans through laundering processes.

Previous ad-hoc commitments made by various levels of government and industry have been fragmented, and have not achieved goals or objectives. For example, in 2009 the CCME approved a Canada-wide Action Plan for Extended Producer Responsibility (CAP-EPR), and a Canada-wide Strategy for Sustainable Packaging. Unfortunately, according to the 2014 progress report on CAP-EPR, only 5 out of 10 provinces have some form of producer requirements for packaging and printed paper, and British Columbia is the only province to have a full EPR program. If we want to achieve the level of standardization required to reach zero plastic waste, we need a comprehensive national plastics strategy that includes legislative tools.

On the upside, public concern is growing, and industry engagement is high. There is huge opportunity for governments to take meaningful action on plastics, and every opportunity must be taken to leverage this momentum.

4. Roles, Responsibility and Leadership –

As mentioned previously, we believe government action is required to achieve the goal of zero plastic waste. A national plastics strategy would level the playing field, and ensure governments from coast-to-coast-to-coast are advancing action on plastic pollution.

The federal government must establish strong and enforceable legislative frameworks in order to drive high recycling rates, and incentivize the creation of reliable end-markets for recycled materials. They must also establish national recycling and recycled content targets, and define standards. Government should be responsible for enforcement. However, we believe producers should be financially and operationally responsible for collecting and recycling the materials they put on the market.

The actions we believe government should take have been articulated elsewhere in this submission, and are listed in [Towards a Zero Plastic Waste Canada](#) at www.environmentaldefence.ca/plasticsdeclaration, and in Appendix A.

5. Multi-Stakeholder Engagement –

The multi-stakeholder engagement exercise for a Canadian Zero Plastic Waste Strategy should involve: all levels of government, producers, brand owners, plastic manufacturers and recyclers, waste haulers, environmental and civil society groups, and the public.

We appreciate the opportunity to provide these comments, and we urge careful consideration of them as well as our full declaration: *Towards a Zero Plastic Waste Canada*. All responsible governments must work diligently to address plastic pollution from coast-to-coast-to-coast.

Kind Regards,

A handwritten signature in black ink, appearing to read 'AWallis', written in a cursive style.

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Appendix A

Towards a Zero Plastic Waste Canada

In Canada, nearly 90 per cent of plastics end up incinerated, or in our landfills, lakes, parks and oceans. Once in the environment, they contaminate ecosystems, kill wildlife, and leach toxic chemicals. It's time for Canada to deal with its plastic production, waste, and pollution problem. It's time for government action.

Less than 11 per cent of all plastics are recycled in Canada. Voluntary, industry-led initiatives aren't going to cut it. As long as making new plastics from fossil resources is cheap, the costs of collecting and recycling plastics is high, and dumping plastics into the environment is "free", the problem will get worse.

Canada needs strong waste policies that hold producers responsible, keep problematic plastics out of Canada, and dramatically increase the reuse and recycling of plastics.

Now is the time for a national waste reduction strategy. One that harmonizes performance standards, measurement protocols, and definitions from coast-to-coast-to-coast, and gets Canada to zero plastic waste by **2025**.

We the undersigned, call on the Canadian Government to:

1. Work with provinces, territories, municipalities and Indigenous governments to develop policies that keep plastics out of the environment:
 - i. Ban plastics and additives that are harmful, or challenging to recycle.
 - ii. Establish product performance standards for innovative materials and alternative feedstocks where evidence clearly shows they are more sustainable.
 - iii. Harmonize provincial recycling targets to ensure 100 per cent of single-use plastics are captured and at least 85 per cent are recycled by 2025.
 - iv. Incent the reduction of waste and reusability of products and packaging, and invest in alternative delivery systems and reuse models
 - v. Establish a national 75 per cent recycled content standard for single-use plastics.
 - vi. Require enforceable Extended Producer Responsibility (EPR) legislation that makes companies financially and operationally responsible for collecting and recycling the materials they put on the market, and reducing resource consumption.
 - vii. Phase-out the export of poorly sorted plastic waste.

- viii. Take remedial action against plastics already accumulated in the environment.
2. Establish consistent definitions, standards and measurement protocols:
 - i. National definitions for circular economy¹, resource recovery, recycling and Extended Producer Responsibility to harmonize waste policy across Canada
 - ii. Protocols for measuring and tracking progress towards targets and performance standards
 3. Following the example of microbeads, take priority steps to declare problematic plastics (such as single-use plastics) toxic under the Canadian Environmental Protection Act (CEPA), and take preventative action to minimize environmental and human health risks by 2020.
 4. Build circularity into the federal government's public procurement policies:
 - i. Require that vendors provide closed loop solutions as part of providing goods and services
 - ii. Lead by example and ensure products and product packaging contains 75 per cent recycled content, and that vendors achieve a 100 per cent capture rate, and 85 per cent recycling rate for single-use plastics
 5. Demonstrate international leadership by championing a global treaty, built on the successful precedent of the Montreal Protocol:
 - i. Set an ambitious and inspiring goal of a circular economy with zero plastic waste by 2030.
 - ii. Establish guiding principles including prevention and precaution, the right to a healthy environment, and polluter pays.
 - iii. Establish product design standards including that all plastic must be recyclable, reusable, or compostable, and banning harmful additives and problematic products.
 - iv. Adopt global targets for reducing plastic pollution.
 - v. Build a global fund to support building a circular economy in the developing world.



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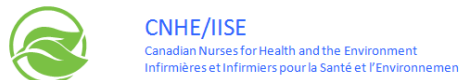
David
Suzuki
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¹ Per Baungart/McDonough a Circular Economy is an economy wherein products and materials should be designed with life cycles that are safe for human health and the environment and that can be reused perpetually through biological and technical metabolisms. This definition therefore does not consider incineration or waste-from-energy to be a form of resource recovery or recycling.



Chemical Sensitivities Manitoba



Friends of the Earth





Ontario
Headwaters



Ontario
Zero Waste
Coalition



PACIFICWILD



Registered Nurses'
Association of Ontario

L'Association des
infirmières et infirmiers
autorisés de l'Ontario



YORK REGION
ENVIRONMENTAL ALLIANCE



Wellington Water
Watchers

WCS
Canada