

Proposed Single-Use Plastics Prohibition Regulations **Canada Gazette, Part 1, Volume 155, Number 52**

Overview

Oxford County is a regional government in the Province of Ontario with eight (8) Area Municipalities and serves as the waste management Operating Authority.

Residential curbside garbage and recycling material is collected through contracted services and municipal service agreements. Municipal solid waste from residential and industrial, commercial, and institutional sectors (IC&I) is received and managed at the Oxford County Waste Management Facility (OCWMF) that includes landfill waste disposal and waste diversion programs such as blue box recyclables, yard waste composting, construction and demolition waste recycling, scrap metal, municipal biosolids, electronic waste collection, and Municipal Hazardous or Special Waste (MHSW).

As identified by the federal government, single-use plastics are a problematic material managed by all levels of government, having an estimated recycling rate of 9%, with the remaining material either ending up in landfills or as pollution. In Oxford County, approximately 2% of waste material generated annually by residential households are non-recyclable plastics which are managed through the curbside garbage and blue box collection programs. Another 13% of non-recyclable plastic materials generated by the Industrial, Commercial, and Institutional (IC&I) sector is managed (landfilled) at the OCWMF.

The County and its municipal service providers - City of Woodstock, Township of South-West Oxford - and the community advocacy group Zero Waste Oxford support product bans to address this problematic material. Through manufacturing bans and aggressive recycling targets, producers of single-use plastics will be encouraged to explore new and innovative options for finding suitable alternatives to single-use plastics. To achieve these targets the federal government must consider a fair and balanced approach with the implementation of this regulation as it is anticipated that such an approach will yield the best results for reducing plastic waste and litter.

The County, Zero Waste Oxford, the City of Woodstock, and the Township of South-West Oxford support the federal government's Single-Use Plastics Prohibition Regulations as released in the Canada Gazette, Part 1, Volume 155, Number 52 on December 21, 2021. The County and its partners further support the development of an IC&I guidance document that will help the business sector achieve the targets and goals of this regulation by eliminating unnecessary single-use plastics.

Comments

Oxford County appreciates the opportunity to provide comments and feedback on the federal government's Single-Use Plastics Prohibition Regulations and offers the following comments.

The Oxford County Submission, in response to the Canada Gazette, Part 1, Volume 155, Number 52, was endorsed by County Council at the February 23, 2022, Council meeting and a copy of the Council resolution has been attached to this submission.

Materials Bans

Recognizing that the federal government is moving forward to ban single-use plastics as part of a long-term plan to address plastic pollution, Oxford County and its partners approve of the six federally-targeted categories (i.e., checkout bags, cutlery, food service ware made with/containing problematic plastics, ring carriers, stir sticks, and straws) designated for elimination and/or significant reduction under this regulation. The targeted materials not only contribute to the overall plastic pollution issue but they are costly to manage. Municipal recycling programs cannot process most, if not all of the materials identified under the ban due to their low material quality, lack of available markets, and low material value. Further, most of the subject materials are not captured during the sorting process at material recovery facilities due to their size and thus end up in the waste stream destined in most cases for landfill.

Exceptions to Material Bans

The proposed regulation shows clear thinking combined with compassion to accommodate individuals who may benefit from the use of such things as flexible straws and other such items for their day-to-day needs.

Producer Focused

The proposed regulation demonstrates clear support for producer responsibility and end-of-life management of single-use plastics which supports the Province of Ontario's producer responsibility efforts under the *Resource Recovery and Circular Economy Act, 2016*.

Establishing viable regulatory standards which include attainable targets to increase the use of recycled content in plastic products as well as increasing the amount of recycled content in plastic packaging by 2030 gives producers of these materials something tangible to work towards. The enforcement of these regulatory standards and targets will be critical in ensuring that producers are held accountable for their products and modify the type of products entering the market and ultimately the environment.

Implementation of a consistent approach nationwide of this proposed regulation and targets will increase the chances of success through uniform messaging and promotion and education. This includes prohibiting misleading recycling labels and manufacturing products not supported by recycling facilities.

Enforcement and Funding

The proposed regulation does not speak to how businesses will need to comply with the regulation and who will be responsible for enforcement and associated cost. It is assumed that compliance with the proposed regulation will be outlined in detail in the Guidance Document yet to be drafted for the IC&I sector. The County and its partners hope that the federal government will provide opportunities for all levels of government to comment on the development of this Guidance Document. Recognizing that all levels of government will play a role in the management of these materials, insight from all stakeholders (government, producers, etc.) will be key in developing a viable guidance document that the IC&I sector can successfully follow.

Support for Remote and Rural Communities

To achieve the goal of 90% diversion of plastic beverage containers and other recycling targets consideration should be given to assisting remote and rural communities with their diversion efforts. The higher costs of recycling programs in these areas often negatively impact the sustainability of these programs. Federal support for innovation and the development of sustainable material recovery programs in more remote and rural areas should be explored.

Promotion and Education

Through this proposed regulation there is a need to develop nationwide publicity programs which educate the public on the benefits of non-plastic solutions as well as a need for proper disposal. In addition to regulatory oversight, market demand will drive change which will ultimately affect the type of products and packaging produced by manufacturers.

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