

Consultation Paper: Towards Canada-Wide Rules to Strengthen Recycling and Composting of Plastics Through Accurate Labelling

Overview

Oxford County is a regional municipality in Ontario with a population of approximately 125,000 and serves as the waste management operating authority delivering municipal solid waste management services to eight (8) area municipalities.

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) including 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 Hazardous and Special Products (HSP).

As identified by the federal government, plastic waste is 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 IC&I sector are managed (landfilled) at the OCWMF.

In 2020, the County removed film plastic (checkout bags, plastic wrap, film packaging) from its blue box collection program and implemented drop off depots for this material as an alternative. Due to processing challenges and potential for contamination of other recycling material streams, collection of film plastic through the blue box program was considered no longer viable. Collection through drop off depots ensures material is clean, improves marketability, and reduces contamination of other recycled material processed through the blue box program.

The County supports introducing labelling rules that prohibit the use of the Mobius loop (chasing-arrows) on plastic products unless 80% of recycling facilities in Canada accept and have reliable end markets for these products. Furthermore, introducing rules that would require producers to assess and label their packaging or single-use plastic items based on recyclability is strongly supported by the County as it takes the decision out of the consumer and places it on the producer to identify what can be recycled in current-day recycling markets.

Comments

The County appreciates the opportunity to provide comments and feedback on ECCC's discussion paper and offers the following for consideration. Many of the questions posed in the consultation paper are technical in nature and pertain to producers and their ability to provide requested data. The County's responses have been limited to discussion questions that are applicable to municipal operations and waste diversion/resource recovery efforts.

1. Are there any other objectives the Government should be seeking to achieve as it develops labelling rules for recyclability?

The use of standardized labelling, allowing for consistent messaging will provide opportunities for improved and consistent educational campaigns across Canada. This improved communication will help consumers understand what can and cannot be recycled, and what happens to the material when it gets recycled.

2. Is there more granular data the Government should be aware of regarding outcomes of specific kinds of plastic items or packaging in the recycling stream?

The reporting system used by Statistics Canada to quantify plastic tonnage sent to landfill and/or to be recycled is comprehensive, regularly updated, and will provide a good benchmark for comparison. It would be beneficial to know plastic contamination levels pre-processing and post-processing. This data will help identify opportunities for improvement (e.g. improved consumer material handling or improved processing systems).

3. Is the “chasing arrows” symbol commonly used for any other product categories beyond packaging? If so, which product categories?

Children’s toys, office supplies like storage bins, plastic garbage lids, etc. are just a few items/categories that contain the chasing arrows symbol. As mentioned in the consultation paper use of the chasing arrows symbol is confusing for consumers as the symbol is interpreted by the consumer as being recyclable instead of communicating the product was made out of. This widespread use of the chasing arrows symbol coupled with consumer misunderstanding of what the symbol means has resulted in much consumer frustration.

Are there special challenges to affixing a label on some type of packaging (for example, films)? What are they?

The County recommends that printing directly onto the film plastic may be a viable option for the labelling of this material.

4. Is there any data (for example, market data) the Government should be aware of regarding the use and prevalence of the “chasing arrows” symbol on packaging and other plastic product categories?

NA

5. What is the process and timeline for designing and implementing changes to labelling (for example, lifespan, costs, marketing considerations, and implementation timelines)?

It would take years to phase out products with the current chasing arrows symbol on them. The County recommends developing a new symbol/label accompanied by an education campaign to explain its relevance and raise awareness about the outdated chasing arrows symbol.

6. Is there any other data the Government should be aware of regarding the accuracy of recyclability labelling on plastic packaging or other product categories?

The County encourages all labelling to include both symbols and terms. Terms such as “recycle this product” with an associated symbol will be easy for the consumer to interpret, assuming that the use of such a term/symbol can only happen if the producer/manufacturer meets the required standards.

The County has no comment on other available data.

7. Are there any other factors that can impact a plastic item’s recyclability, beyond the factors listed above?

Multi-material packaging also makes recycling difficult. Consumers are either unaware that they need to separate the various materials or choose not to do so, resulting in the item being handled through the waste stream, even if the consumer attempts to recycle it. For example, an envelope with a clear window or a bottle with a partial plastic sleeve, all present issues during the sorting and processing phase of a material’s end-of-life cycle.

Recycling processing of certain plastic items (eg film) with other material collected through municipal blue box programs may not be viable and can result in processing equipment failures and contamination of other material streams i.e. fibre/paper. Drop-off depots are a more viable option for recycling of some plastic items.

8. What kinds of information would make it easier for individuals to prepare and sort plastics for recycling adequately?

The consultation paper states that consumers look for the recycling symbol to see if the item can be diverted. The County recommends that information on the product’s recyclability, reusability, etc., should be more prominent making it easier to locate for those individuals less likely to search for the information.

Any information provided on a product’s recyclability and how to prepare it for collection must be easy to find, simple to interpret, and consistent. Consumers will not invest a lot of time to prepare a product for recycling. Any effort exceeding a simple rinse (if needed) and toss is often considered too time-consuming.

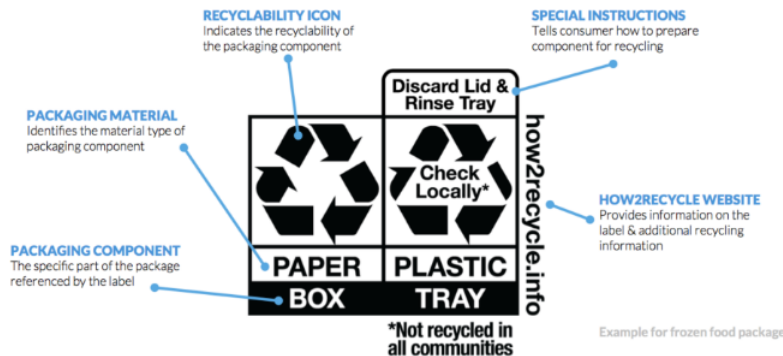
9. Is there any other information the Government should be aware of regarding levels of public trust or confidence in recycling systems, links between recyclability labelling and public trust, or links between public trust and levels of participation in recycling systems?

The County is unaware of any formal information which has surveyed consumers on this issue. However, anyone overseeing the curbside collection blue box program can confirm that interaction with residents indicates that there is low confidence in the amount of material that gets recycled if recycled at all. Education is key to addressing this perception. Clear and concise messaging needs to be shared about the recycling process in Canada. This message should also explain how to prevent your recycling from ending up in the landfill (i.e. by rinsing out the material so there is no contamination).

10. What kind of design features on plastic items or information on labels would be most effective in helping strengthen public trust in recycling systems?

The County recommends implementing a labelling system similar to what has been produced by How2Recycle. Their label contains both symbols and terms and are easy to interpret.

It's a smarter label system.



11. Could more accurate labels be used in sorting facilities to improve outcomes? If so, how?

Given the pace that sorters must work at, the County assumes that there would be little to no time available for the sorters to read labels and in a fully automative facility, labels would be of no use.

12. What are the major differences between what is accepted in public recycling programs and what is collected for recycling from ICI locations that the Government should consider?

Public recycling programs typically accept paper products and packaging materials for commonly used residential household items. In addition to items accepted in public recycling programs the ICI sector also produces plastic waste specific to their business. This means that unless the manufacturer of these items has a take-back program, the items end up in the waste stream.

13. Does the regional market breakdown reflect the current situation in Canada? Are there alternative ways to establish 80% population thresholds?

The regional market breakdown appears reasonable, however, it should be noted that there are a lot of inconsistencies in how materials are recycled; usually, it's based on what a contractor can arrange with end markets, and if transportation costs are feasible – a potential deterrent for northern/rural communities.

14. Do companies currently identify what is collected for recycling when developing recyclability labels? If so, how?

NA

15. How could labelling rules provide accurate information to residents of rural, remote or Northern communities where recycling programs may operate on different models (for example, drop-off depots) or may not be present at all?

Labelling should remain as consistent as possible and consideration should be given to adding recycling information for communities with drop-off depots. Many municipalities operate both curbside and drop-off depots for recycling, so adding this information to a nationwide label would apply to any community with some form of a recycling program.

16. How often do acceptance rules for public recycling programs change, and why?

Acceptance rules for recycling programs may change based on discontinued or new end markets and when collection and processing Vendors change that have different processing capabilities.

17. What kinds of information should be sought as part of the initial survey and assessment of what is accepted for recycling across Canada?

Details of how a recycling program operates will be important to understand and items collected at a depot may not be safe to collect with a compaction curbside collection vehicle. Things for consideration include:

- Acceptable materials (detailed list with subcategories)
- Collection method, curbside vs drop-off depot
- Curbside program - single stream vs two stream
- Audit reports/contamination rates
- Collection vehicle types (compaction vs non compaction)
- Other program requirements/restrictions/limitations

18. Are there any other factors the Government should consider in developing an approach to determine whether a North American end market exists for a particular plastic item?

NA

19. Are there any particular categories of plastics that likely do or do not have North American end markets? Why?

NA

20. Are there any other factors the Government should consider in developing an approach to determine whether a North American end market for a particular plastic item is reliable?

Tolerance levels for contamination and material quality should be assessed if possible. Supply and demand often dictate material quality acceptable for the end market and understanding these tolerance levels will help confirm if viable end markets are available.

21. Is there any data on end-of-life outcomes for compostable plastics and other types of biodegradable or degradable plastics, the Government should be aware of as it develops labelling rules?

NA

22. Are there any other objectives the Government should be seeking to achieve through compostability labelling rules? If so, what are they and why are they important?

The County recommends that the federal government consider a public education objective. Public outreach will be needed to increase the diversion of organic waste from landfill and to decrease contamination. The general public needs to have a better understanding of what is meant by a contaminant.

23. Are there any limitations or exclusions or additional elements that should be incorporated into these categories included in the scope of application? If so, why?

NA

24. Which of the above approaches for the kinds of recyclability claims that should be subject to labelling rules (1, 2, 3) should the Government adopt, and why? Is there another approach the Government should adopt instead?

Oxford County supports Approach 3 as it will communicate greater information to the consumer about the recyclability of a product, therefore increasing the chance of the product being diverted from the waste stream.

25. If an obligatory system is adopted, what should the Government consider in order to minimize burden on industry while maximizing environmental outcomes (for example, appropriate timelines, cumulative impacts of different labelling requirements)?

Oxford County supports the implementation of an obligatory system and recognizes that to do so will require time to achieve full implementation. A phase-in period of no more than 3 years would be appropriate. This would all manufacturers/producers to plan for the new labelling regime without having to re-label existing inventory.

26. Are there any other kinds of plastic items that may warrant special rules or exemptions from labelling rules under an obligatory system? Why?

NA

27. What should be the minimum standards to ensure consumers can easily access and use information on a label (e.g., size, font, location on the package, text size, required symbols)? Why?

Oxford County supports using Approach 1 as consistency in the label design, overall look, font used, font size, etc, will ensure that all required information is included on the label and consumers know what to look for, similar to the requirements for WHMIS labelling. By using Approach 1 the government can regulate font size, label size, symbols used, etc. which will address the need for labelling consistency.

28. Are there any other considerations besides components and regions that may require qualified recyclability information?

NA

29. Would there be any unintended consequences of prohibiting the use of the “chasing arrows” symbol for any purpose other than to refer to recyclability?

NA

30. Should there be any criteria for determining whether a third-party certification is adequate to ensure compostability in Canadian composting facilities? If so, what should be the criteria and why?

Oxford County recommends that the federal government review the Compostable Products/Packaging: Towards Common Ground, November 2002 report which discusses third-party certification and compostable labelling requirements.

31. Are there existing third-party certification programs that would ensure compostability in Canadian composting facilities? If so, which?

Oxford County recommends that the federal government review the Compostable Products/Packaging: Towards Common Ground, November 2002 report which discusses third-party certification and compostable labelling requirements.

32. Are there any other principles or other important considerations the Government should take into account in developing rules for compliance and compliance verification?

NA

33. Are there any other kinds of potential compliance mechanisms the Government should be aware of as it develops rules for labelling?

NA

34. What kinds of changes would be needed to existing tools, guidelines and programs to meet the new labelling rules? How could the Government help facilitate these changes to ensure existing tools, guidelines and programs can continue to be used?

NA

35. Are there any other kinds of tools and guidance the Government should consider developing to support industry and facilitate compliance with labelling rules?

NA

36. If a technical committee of experts is established, what should be its composition and what should be its role in the development of tools and guidance?

NA

37. How should the Government work with partners and stakeholders to spread awareness and promote compliance with labelling rules, including disclosure requirements?

Spreading awareness and promoting compliance with labelling rules can be done by partner and stakeholder categories (e.g. producer; provincial/territorial/municipalities; etc.) through webinars, consultation sessions, surveys, requests for written feedback on approaches, etc.

38. Are there any other performance metrics the Government should consider in tracking progress and evaluating success?

The objectives listed in the consultation document cannot be achieved without a significant public outreach campaign. Documenting public outreach and education on the new labelling regime and reporting on any feedback that may alter approaches for the better should be considered.

Prepared for:

Tracey Spack, Director, Plastic Regulatory Affairs Division, Environment and Climate Change Canada
(plastiques-plastics@ec.gc.ca)

Further Information:

Frank Gross, Manager of Transportation and Waste Management (fgross@oxfordcounty.ca)