

ATT: Dany Drouin  
Director General of the Plastics and Marine Litter Division  
Environment and Climate Change Canada  
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Gatineau, Quebec K1A 0H3  
Canada

9 December 2020

Dear Mr. Drouin,

Thank you for the opportunity to comment on your discussion paper on the proposed plastic ban. We commend your integrated approach towards addressing this complex issue and we hope to see the elimination of plastic “waste” and pollution within the next 10 - 20 years. We believe this can best be achieved through a collaborative approach between relevant stakeholders and ensuring plastics are managed within a circular economy framework.

**Sustainability Consultant Network (SCN)** is an environmental grassroots organisation in Toronto. Our mission is to help address environmental challenges faced in the communities that we live in and beyond. We would like to contribute the following recommendations, pooled from our collective knowledge of the plastic situation in Canada and our diverse experiences around environmental sustainability.

We recently hosted a webinar that featured key stakeholders in the plastic debate, specifically a representative from the Plastics Division at the Chemistry Industry Association of Canada, a progressive small business plastics recycler, and an expert on plastic litter from Western University. There were a lot of takeaways from the webinar which we have also used to inform our recommendations below:

1. The Federal Government should focus on reducing fossil fuel subsidies, including the fracking industry, to equalise the playing field between virgin and recycled plastics and thereby alleviate the problem at source.
2. Whilst we support the reduction of unnecessary plastic items as proposed by ECCC, we are concerned that using Schedule 1 of the Canadian Environmental Protection Act, 1999 (CEPA) may not be the most appropriate legislative tool for all plastics. It may be applicable for Plastics containing POPs (persistent organic pollutants) and other

hazardous chemical additives. To this end, perhaps producers should be mandated to label their products with the aim of phasing out toxic additives.

We suggest using Sustainable Materials Management or Extended Producer Responsibility (EPR) legislation for less or non toxic plastics. These plastics would be managed as a technical resource that becomes part of a circular economy. Use of EPR would ensure plastics producers are held accountable for what they produce, which will hopefully lead to standardized non toxic plastics that are capable of being continuously recycled or recovered.

Government should drive the industry to set realistic timeframes and goals to implement EPR. Products ending up as litter or in landfills/incinerators after a certain date should be traced back to the producer who will in turn be held accountable.

We urge the Government to work closely with the Provinces and plastic industry experts (industry representatives, recyclers and producers) to incentivise and leverage innovative technologies for reduction, reuse, recycling and advanced recycling with the aim of recovering all plastics within a given timeframe.

3. The Federal Government should work with relevant stakeholders to set the industry standards, and incentives, for recycled content in plastic products.
4. Increase subsidies to municipalities to upgrade technologies and capacities so as to facilitate an increased recycling rate for plastics.
5. Use local and international best practice tools to increase recycling and recovery rates of plastics throughout Canada. Examples include a standardised container deposit systems, standardised blue box systems, redesign of certain plastic products and incentives to support innovation and technological solutions.

We are grateful for this opportunity to voice our views and recommendations, and stand ready to engage in further dialogue. We will also be happy to discuss how we could use our organisation and network to contribute towards your plans to address the plastic issue.

Sincerely,

Efua Bamfo

Veronika Kosova

Patrick Metzger

Mark Takefman

Andre Chin

Charlotte McDevitt

Stephen Phoon

Yidan Xu