



Front commun québécois
pour une gestion écologique
des déchets

7 May 2018

The Honourable Catherine McKenna, P.C., M.P.
Minister of Environment and Climate Change
House of Commons
Ottawa, Ontario K1A 0A6

Re: Canada's leadership to reduce plastic waste and marine litter

Dear Minister McKenna,

The undersigned environmental organizations have long been champions of waste elimination in our provinces, working co-operatively and independently to develop effective policies, conduct research, and undertake educational campaigns to engage and empower Canadians to adopt mindful lifestyles and consumption behaviours.

As agents of change we work in partnership with provincial and local governments, businesses, schools, and individuals with focus on markets-based solutions that result in measurable environmental gains. Our broad mandates and diverse memberships span entire supply and value chains: manufacturers, sellers, recyclers, and consumers. Our expertise in waste elimination spans decades and we value our reputations for supporting policies that translate to sustainable solutions for all Canadians.

Though waste and recycling policy in Canada is administered provincially and managed locally, material management has national and international implications. The amount of discarded material generated in Canada and abroad grows unabated, and our ability to manage it has global health, environmental, and economic repercussions. For instance, according to a report produced by the World Economic Forum and Ellen MacArthur Foundation, 95 per cent of plastic packaging material value, estimated at US\$120 billion annually, is lost to the economy after its first use. A United Nations-commissioned report found that the overall natural capital cost of plastic use in the consumer goods sector each year is US\$75 billion, and plastic waste causes US\$13 billion in annual damage to marine ecosystems.

For these reasons we are united in support of the Government of Canada taking prescient action by tabling a zero-plastics waste charter at the 2018 G7 Summit. As holder of the G7 Presidency, Canada can advance global and national plastic waste reduction strategies that offer immediate and long-term solutions. Canada has already led by example in banning microbeads in cosmetic products.

Our consortium understands that solutions to mitigate plastic waste and marine litter require a multi-layer strategy strengthened by improved policies, incited markets, and changed behaviours. The central tenets of solutions are embedded in sustained markets that handle discarded plastic; manages them in a way that keeps them at their highest and best use at all times; and shifts production and consumption cycles away from the linear model of consumption to one that maximizes the value of products and materials throughout their entire life.

When the concept of the circular economy is applied to plastics, the opportunity to protect land and water bodies is at its greatest. Encouraging and showcasing smarter decisions related to plastic and packaging production, consumption, and management is where we will achieve positive and measurable results.

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With these considerations, we suggest the following aspects be included in a global or national strategy, which our organizations would be pleased to assist in developing.

1. Focus on the source

Plastic waste and marine litter is the result of poorly designed products and packaging, and irresponsible management at end of life. Policies and market shifts can play a key role in addressing these symptoms and ultimately the root problem.

2. Create sustained markets that demand post-consumer plastics

Policies and market support are required to motivate producers to choose plastics that preserve value after single-use and reintegrate them as feedstock in the production process. At present, recycling markets compete with cheap disposal, and the recycling industry requires a consistent source of materials in order to fill production cycles. Manufacturers and producers may not fully understand nor consider end of life management costs of materials they choose, and therefore, are not incented to make improvements. As such, policies and market support should redirect materials away from disposal and into recycling. Creating sustained markets that fulfill demand may take intersecting policies that offer incentives and disincentives. There is extensive research and policy applications that have tested the effectiveness of approaches from which Canada can draw.

3. Integrate circularity into government procurement

Organisation for Economic Co-operation and Development countries spend 12 per cent of their GDP on public procurement. With a \$1.9 trillion GDP Canada spends \$230 billion on procurement alone. The Government of Canada purchases \$16 billion worth of goods and services every year. Governments have unrealized potential to advance circular economy models and principles through purchasing and procurement that can meet environmental and economic objectives, including those specific to reducing plastic waste. By applying circular procurement principles governments can drive market shifts through service agreements that favour access over ownership, change vendor relationships to require product take-back, and integrate specification that minimize plastic or require products designed to be easily recycled.

4. Grow domestic recycling solutions

Canada and other G7 nations are dealing with prohibitions and restrictions introduced by China, the world's largest recycling end-market for plastic. China's historical demand for material collected by Canada's public and private service providers contributed to a shortage of ongoing investments in local plastic recycling markets. The combination of cheap disposal, lack of infrastructure, and over-reliance on foreign markets has made Canada vulnerable to losing recyclable plastic to disposal. A plastic strategy must encourage and support domestic growth in recycling industries to manage and process material locally.

5. Develop federal standards

Canada has a patchwork of policy approaches to waste reduction and recycling, and suffers from disparities that affect provincial performance and markets. There is no consistency in data reporting, measurement, or definitions of recycling and/or disposal. There is also an absence of benchmarking and goalsetting that causes substantial variance in performance. According to Statistics Canada's biannual reports on waste, the only national data available on this topic, provincial diversion rates range from as low as 15 per cent to as high as 40 per cent.

Furthermore, Extended Producer Responsibility (EPR) is a policy focus for provincial and territorial jurisdictions, however, its design and implementation span the product stewardship spectrum. Current EPR policies and programs have different scopes, financial models, performance definitions, and approaches to enforcement and compliance. Where there are EPR programs applied to plastics the diversion rate is still far too low. The introduction of national standards could be the catalyst to create harmonized frameworks, facilitate consistent data collection, and set national targets for plastics waste recycling.

In all, we would like to offer our expertise and experience as you prepare a zero-plastics-waste charter for the G7 Summit and discuss Canada's vision and strategy. We would be pleased to meet with you collectively in Ottawa at your earliest convenience to engage with you on circular economy initiatives, plastics, and marine litter; and how we can champion the Government of Canada as it takes the lead on the world stage.

Yours sincerely,

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