

Ottawa

Room 349, Confederation Building
Ottawa, Ontario K1A 0A6
Tel.: 613-996-1119
Fax: 613-996-0850



HOUSE OF COMMONS
CHAMBRE DES COMMUNES
CANADA

Ottawa

Pièce 349, Édifice de la Confédération
Ottawa (Ontario) K1A 0A6
Tél. : 613-996-1119
Télé. : 613-996-0850

Constituency

9711 Fourth Street Suite 1
Sidney, British Columbia V8L 2Y8
Tel.: 250-657-2000
Fax: 250-657-2004

Elizabeth May

Member of Parliament / Député(e)
Saanich — Gulf Islands

Circonscription

9711, rue Fourth suite 1
Sidney (Colombie-Britannique) V8L 2Y8
Tél. : 250-657-2000
Télé. : 250-657-2004

The Honourable Jonathan Wilkinson
Minister of Environment and Climate Change
House of Commons
Ottawa, ON
K1A 0A4

December 8, 2020

RE: Consultation Submission on the Proposed Integrated Management Approach to Plastic Products to Prevent Waste and Pollution

Dear Minister Wilkinson,

I am writing today to provide feedback on the proposed integrated management approach to plastic products to prevent waste and pollution discussion paper. I am grateful for this consultation opportunity.

Reducing the mismanaged waste that is generated by the plastic system will take systemic change. It must remain clear that the most attractive solution from an environmental, economic and social perspective is to reduce plastic production as much as possible. The primary goal to achieve this must be to incentivise reusability and move towards a zero-waste society. Improving and increasing mechanical recycling and the substitution of plastic with environmentally friendly alternative materials should be used as a secondary, interim approach, while the controlled disposal of products should be used as a last resort. Canada must strive towards a near-zero leakage vision in its management approach to plastic products.

The Narrow Scope of Canada's Proposed Single-Use Plastic Ban

When compared to bans implemented by other countries, Canada's ban is not comprehensive. Though the EU's ban on single-use plastic items resembles Canada's plan, the EU also plans to ban all products made of oxo-degradable plastic in 2021. The EU has also outlined mechanisms to further reduce plastic waste and has already invested substantial funding to initiatives such as developing more recyclable plastic materials and improving recycling processes.

No country seems to have embraced a plastic ban as sweeping as France. In 2020, single-use plastic plates, cups and cotton buds have been banned.¹ In 2021, disposable cutlery, plastic takeout cup lids, confetti, drink stirrers, foam



containers, plastic straws and produce packaging containers will be banned, with more bans set to take place in 2022. Canada only includes 6 items in its single-use plastic ban, paired with a promise for “further analysis” to establish a plan for the other items on the preliminary list of environmentally and value-recovery problematic plastic products. This is not an ambitious plan.

Plastic Water and Beverage Bottles Smaller than 5 Gallons

Canada must include single-use plastic water bottles and other non-essential plastic beverage bottles that are smaller than 5 gallons as a part of its ban. This includes 8 oz, 10 oz, 12 oz, 16.9 oz and 20 oz bottles, as well as any other personal, single-use plastic beverage bottle smaller than 5 gallons. These plastic bottles are often used for water and soft drinks; they add unnecessary plastic pollution to the environment. I share this perspective with organizations such as the David Suzuki Foundation, Greenpeace Canada and Save our Water, who are also calling for a comprehensive ban on non-essential single-use plastics.

In the integrated management approach discussion paper, plastic beverage bottles and caps are clearly marked as environmentally problematic, but they are not viewed as value recovery problematic. Even if small plastic water bottles and single-use plastic beverage bottles pose minimal value-recovery problems when compared to other products, Canadians acknowledge that these items are nonessential, and that eliminating these products will enable Canada to move forward with its goal of plastic reduction.

Canada is a country where overwhelmingly, the water that is available to Canadians through their taps is safe, affordable, clean and supplied by government through public systems. Yet, Canadians consume more than 2 billion plastic water bottles every year.ⁱⁱ The energy that is needed to produce a plastic water bottle is up to 2000 times the energy needed for the equivalent volume of tap water.ⁱⁱⁱ

The best alternative is a reusable water bottle. Single-use plastic water bottles and beverage bottles smaller than 5 gallons must be included on the list of single-use plastics that need to be phased out permanently by 2021. At the same time, Canada must remain committed to its responsibility to ensure that everyone in the country has access to safe drinking water.

Addressing Items on the Preliminary List of Single-Use Plastic Products

The government must set concrete and short-term reduction targets for the remaining items on the preliminary list of single-use plastic items and other highly environmentally problematic items that did not qualify as being included in the ban. The government has documented many initiatives in the “Canada-wide Strategy on Zero Plastic Waste.” This includes items such as single-use wipes, disinfecting wipes, diapers, personal care products, and feminine hygiene products. I also recommend that plastic produce bags be included in Canada’s ban alongside plastic checkout bags.

Establishing Scientifically Informed Standards for Biodegradable Products

Canada must establish scientifically informed, nation-wide standards for biodegradable plastic products with a standard for each environment in which they will biodegrade, including marine, home compost, industrial compost and landfill. These standards must be effectively communicated to manufacturers, importers, distributors, retailers and consumers.

There currently exists a substantial amount of confusion for both sellers and consumers related to alternative solutions to conventional plastic products. As awareness of the plastic problem has increased, so have “eco-friendly” and “environmentally-conscious” solutions to conventional plastics. Canada must ensure that these products improve a product’s environmental footprint or increase recovery rates of these products when they become waste.



Truly biodegradable, environmentally benign plastics are composed of materials that degrade with a standardized, acceptable time frame into products that are readily incorporated into the natural carbon cycle. They are also non-toxic and do not lead to the accumulation of persistent additives in the food chain. Canada must establish a standard for each environment in which such degradation occurs.

Washing Machine Filters

By 2021, the Canadian government must require that all new washing machines sold in Canada must have a removable, cleanable filter to capture micro-fibres that otherwise pass through water treatment plant filters and into water bodies. Given that a significant amount of these micro-fibres come from laundering, this mandate would reduce the amount of microplastics entering water bodies.

If the plastics value chain is not rapidly transformed, the compounding risks for marine species and ecosystems, our climate, our economy, and our communities will become unmanageable.^{iv} Alongside these risks, there is an opportunity for Canada to take on the challenge to transition to a more sustainable world. I hope the Canadian government will step up boldly to seize this opportunity.

Thank you again for this consultation opportunity and for your consideration.

Sincerely,



Elizabeth May O.C., M.P.
Member of Parliament for Saanich-Gulf Islands
Parliamentary Leader of the Green Party of Canada



Endnotes

ⁱ "The Environment: France takes the lead on furthering Europe's Ambitions," Government of France, June 2018, retrieved at <https://www.gouvernement.fr/en/the-environment-france-takes-the-lead-in-furthering-europe-s-ambitions>

ⁱⁱ Retail sales of bottled water in Canada from 2015 to 2022, retrieved at <https://www.statista.com/statistics/481516/forecasted-retail-sales-of-bottled-water-canada/>

ⁱⁱⁱ "How Much Energy Goes Into Making a Water Bottle?" Lisa Zyga, March 2009, Phys.Org, retrieved at <https://phys.org/news/2009-03-energy-bottle.html>

^{iv} Breaking the Plastic Wave: A Comprehensive Assessment of Pathways Towards Stopping Ocean Plastic Pollution", PEW Charitable Trust and SYSTEMIQ, July 2020, retrieved at https://www.pewtrusts.org/-/media/assets/2020/10/breakingtheplasticwave_mainreport.pdf

"Beach Cleanups Results". 2020. *Surfrider Foundation*. <https://cleanups.surfrider.org/results/>.

CIEL, et al. 2019. "Plastics & climate: the hidden costs of a plastic planet". <https://www.ciel.org/wp-content/uploads/2019/05/Plastic-and-Climate-FINAL-2019.pdf>.

Ecojustice. 2019. "Calling wipes "flushable" is false and misleading, say environmental groups". <https://ecojustice.ca/pressrelease/calling-wipes-flushable-false-misleading/>.

Environment and Climate Change Canada, 2020. "Science Assessment Of Plastic Pollution". Government of Canada. <https://www.canada.ca/content/dam/eccc/documents/pdf/pded/plastic-pollution/Science-assessment-plastic-pollution.pdf>.

Eunomia. 2018. "Assessment of measures to reduce marine litter from single use plastics". European Commission. https://ec.europa.eu/environment/waste/pdf/Study_sups.pdf

