

Do not go where the path may lead - go instead where there is no path and leave a trail.

May 18, 2023

Tracey Spack, Director
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Re: Comments on Technical Paper for Federal Plastics Registry

Dear Ms. Spack:

Thank you for the opportunity to respond to the recent document addressing this Technical Paper for the Federal Plastics Registry.

Nanaimo Recycling Exchange Society is a non-profit registered charity with the Constitutional mandate to reduce waste and achieve the “Conserver Society” promoted by a previous Trudeau government and Science Council of 1973. From the early 1970’s to 2018, the society operated a Recycling Depot that provided recycling, reuse, education, and outreach services for the community. Since 2018, the society has realigned operations to restore and prioritize conservation principles of the founders.

For information about the Nanaimo Recycling Exchange Society commitment to Conserver principles, visit <https://www.recycling.bc.ca/>

Nanaimo Recycling Exchange Society (NRES) offers comment, and recommends some edits to the document.

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1.1.1 Why a federal plastics registry is needed

NRES has participated in and studied Canadian EPR programs for many years. After many years of managing programs at the depot level, and throughout many consultation processes that included detailed reading and comparisons of plans and results, and of provincial regulations and reporting requirements, it continues to be difficult to tell whether EPR programs have had impact.

NRES continues to advocate for clear national standards such that data can be used to assess and compare outcomes. There is work being done, and much work yet to be done to achieve a level of standardized plans, reporting requirements and product management practices to make assessments of environmental impact and product design change or removal. That was, after all, the purpose of EPR from the beginning; however, EPR is being redefined by industry to prioritize efficiencies over environmental protection, and collection results over product management results.

This trend challenges the wisdom of placing waste and pollution reduction in the hands of industry led EPR programs. Yet, that is the trajectory.

This Registry **needs EPR data that doesn't exist now**. Producers (through arm's length PRO's) have free reign to control the most important environmental aspects of EPR: definitions, fee schedules, and management of products according to the hierarchy. That's a free ride for producers to manage plastic by cost, profits, and efficiencies that override management for environmental outcomes (because they are more expensive).

Unless there is

- standardized national definitions of Recycling, Recyclable and other R's
- fee schedules policy that incentivizes design change
- one standard national Pollution Prevention Hierarchy implemented SUCH THAT pollution prevention is not undertaken at one level unless or until all feasible opportunities for pollution prevention at a higher level have been taken,

there won't be meaningful baseline data. If the Registry adopts these standards and requires reporting to these standards, then there is a strong case for Provincial EPR to adopt the same standards. Harmonizing EPR to a national standard is a goal of CCME.

3. Data to Report

The description of Plastics collected for diversion should read

The total amount of plastic collected ~~and recycled by an EPR program and sent to a sorting facility for diversion.~~

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The description of Plastics successfully recycled should read

The total amount of plastic collected for diversion, and treated ~~by some or any of the following processes:~~

- a. ~~conventional mechanical activities that separate, grind and heat products to produce plastic feedstocks or resins, composting and digestion of some plant-based plastic-like materials to produce soil amendments~~
- b. ~~chemical or thermal processes such as depolymerization, pyrolysis or gasification that convert plastics into monomers or petroleum products (for example, methanol, diesel)~~

There is no successful composting of plastics according to Canadian composting facilities. Compostable plastics are treated as contamination at Canadian composting facilities. As such, they are screened out and sent to landfill.

Chemical recycling is unproven. Chemically recycled resins should not be included as chemical recycling has [unproven] potential to treat contaminated and heterogeneous mixtures of polymers with only limited pre-treatment. Conversely, many of the processes produce fuels which, when combusted, contribute to global warming as the raw materials are derived from fossil fuel carbon sources (Haig et al., as cited in OECD, 2018).

What would be the definition of “successfully recycled” by a chemical or thermal process? Until the technology and outcomes are understood, there should be a more detailed assessment of chemical recycling outcomes that don’t yet assume successful recycling.

3.3 Resin types

Resins must be attributed to each single product. That is the only way EPR can be used to affect design change. It is the only way consumers will have to finally be educated enough from data to make upstream decisions to purchase or not purchase. These are strong incentives for Producers to pay attention to design.

3.7 Verifying data

From the first year, require

- all data points are verified by a third-party verification body accredited to ISO 17029 or other established nonfinancial standards (such as Canadian Standard on Assurance Engagements 3000) to be in conformance with verification requirements

Do not allow self-verification. It’s the wrong message.

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4. Confidential business information

In early days of recycling, all end fate data was available to recyclers, and we could pass this information on to consumers who recycled their products.

Then came EPR. Then came plastic. Then came trade secrets. Then came 9% recycling.

This is the best opportunity to make product management transparent in a meaningful way to consumers. All they want to know is what happens to their products when they pass them along. Diversion means nothing to them. Sorting means nothing. Processing means nothing. Does it get made into another product? It's all that matters, and it's the best kept secret in the world of plastic and EPR. It has eroded public trust in recycling.

Company identification is not necessary, but brand and product information is necessary for purchase decisions. The public consumer wants to make a difference to pollution and climate change and they can't do it if information is kept from them.

5. Phased Implementation Approach

Phase 3 for Electronic and Electrical equipment and White goods could easily be upgraded to Phase 2 as they are actively being reused, refurbished, recycled and recovered now.

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