



May 28, 2018

Plastics Consultation
Environment and Climate Change Canada
351 St. Joseph Blvd., Place Vincent Massey, 9-064
Gatineau QC K1A 0H3

Via e-mail: ec.plastiques-plastics.ec@canada.ca

Dear Sir/Madam:

**Subject: CCSPA Comments on Consultation on Managing and Reducing Waste:
[Moving Canada toward zero plastic waste](#), April 22, 2018**

The Canadian Consumer Specialty Products Association (CCSPA) is a national trade association that represents 35 member companies across Canada that manufacture, process, package and distribute consumer, industrial and institutional specialty products, such as soaps and detergents, pest control products, aerosols, hard surface disinfectants, deodorizers and automotive chemicals. CCSPA and our members have been active participants and supporters of the federal Chemicals Management Plan (CMP) since 2006.

CCSPA and our members have also been active participants in the many provincial post-consumer waste programs across Canada since their inception. As well, we have been consistently engaged with the Canadian Council of Ministers of the Environment (CCME) initiatives related to packaging- and product-related extended producer responsibility programs.

Whether on chemicals management or end of life management of packaging, CCSPA works to ensure that all aspects of programs embody these three pillars:

- sound science is the basis for all decisions;
- due process and consultation; and
- effective communications to Canadians.

We are pleased to provide the following comments on the Consultation for *Moving Canada toward zero plastic waste*.

The purpose of the Consultation is to share ideas about how Canada can reduce plastic waste and marine litter and help develop a federal-provincial-territorial approach to keep plastic within the economy and out of landfills and the environment. The Consultation states that plastics are part of the everyday lives of most Canadians thanks to their low cost, durability and utility and that the amount of plastic designed to be used once and then thrown away can waste resources and energy and can lead to litter or landfill issues. The consultation states that it is time to take action to reduce plastic waste and reduce marine litter in Canada.

To assist with these goals, CCSPA offers the following suggestions and comments:

- **Packaging is necessary to ensure product safety, integrity and to avoid waste and spoilage in transit.** Our members have worked over the years to reduce packaging and increase its effectiveness and efficiency. As one example, CCSPA participated in Concentrate on the Future, a national unbranded initiative of multi-stakeholder organizations committed to educating consumers on the environmental benefits of choosing new 2X and 3X concentrated liquid laundry products. Our participation as a Supporting Partner of Concentrate on the Future is part of a shared commitment to help consumers adopt lifestyle changes that will make a difference. Because just one small capful – typically 1/2 to 2/3 smaller – is all that is required to wash a full load, these concentrated formats benefit the environment by producing less packaging waste, saving water and helping to reduce greenhouse gas emissions. See [more here](#).
- **Any packaging considerations should be viewed through a Life Cycle Analysis lens, not solely focused on the end of life recovery.** For example, opportunities such as cold water detergents offer significant energy savings. In fact, the home use stage for laundry detergents has been demonstrated as having the highest environmental impact, based on Life Cycle Analysis.
- **Canada’s provincially regulated post-consumer extended producer responsibility (EPR) programs are world class.** For example, the Ontario Blue Box program has been diverting packaging waste, including plastic from landfill, for many years. Blue Box programs are also mature in Quebec, Manitoba, Saskatchewan and British Columbia. Industry - [the brands in the blue box](#) - pays for anywhere from 50% to 100% of these programs, with a trend toward 100% as regulations emerge. Programs such as these are far less developed in the United States or in many other countries. Moving forward, material-specific targets are being envisioned. Ontario’s recent proposal to amend the Blue Box Program would introduce a plastics diversion target for the first time, proposing to set at an ambitious 50% — representing a 43% increase over its current plastic recycling rate of 35%.
- **Significant progress has been made through Canada’s provincial EPR packaging programs, funded by the Brands in the Box. For example, did you know:**
 - **Ontario Blue Box Results** (Ref. [Stewardship Ontario Annual Report, 2016](#)):
 - Residential packaging diversion rate is the highest in North America - 64% recycling rate;
 - 98% of Ontario Households have access to recycling; serving 13,465,269 people; 5,427,113 households, 63.3 kg recycled per capita;
 - \$122,872,314 total fees collected in 2016 included from CCSPA members, for Ontario alone; and
 - Similar statistics are available for blue box programs in BC, Saskatchewan, Manitoba and Quebec.
 - **Ontario FAQs (similar FAQs available in other provinces):**
 - [Who is responsible for the Blue Box Program?](#) It is the responsibility of industry to fund stewardship programs for various wastes.

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- [Who pays for the Blue Box Program?](#) The cost of running the Blue Box Program is split between the municipalities and the companies that produce materials that end up in curbside recycling boxes.
 - [What is a diversion rate?](#) The Blue Box Program diverts almost a million tonnes of printed paper and packaging each year and continues to keep the percentage of waste that goes to recycling above the 60 per cent target rate.
 - [Why should I recycle?](#) Recycling turns products that would otherwise become waste into new products or resources.
- **Consumer Education Resources:**
 - [WHAT HAPPENS TO MY RECYCLING?](#) Published on March 12, 2013...includes that Rigid Plastics High density plastics, used to make containers like laundry and household cleaning bottles, come back as many new products, including decking, picnic tables, deck chairs, gardening supplies and even the Blue Box itself...
 - [More Blue Boxes now accept mixed plastics](#) and a [video](#)
 - [Hidden Recycling at Home Part 2](#)
- **On October 29, 2009, the Canadian Council of Ministers of the Environment (CCME) approved a Canada-wide Action Plan for Extended Producer Responsibility (CAP-EPR).** The document was developed with the expectation that Canada could improve its waste diversion statistics through a greater use of Extended Producer Responsibility (EPR) for certain categories of post-consumer waste. CCSPA provided comments on the proposed document prior to its publication supporting a national approach to waste diversion regulations in Canada; supporting the development of waste management goals and targets, followed by a collaborative process for identifying best practices for achieving those goals or targets; requesting that a cost-benefit analysis should be part of any plan and should ensure Canadian economic competitiveness; and noting that municipalities, consumers and producers share responsibility for the success of a waste management plan
- **The CCME could reinvigorate efforts toward harmonized post-consumer EPR solutions in Canada.** CCSPA provided input to CCME on a March 2016 consultation on “Key Elements of EPR and Product Stewardship Programs in Canada”. Since then, there has been no progress or update. CCSPA is a strong advocate for consistent, harmonized post-consumer EPR programs in Canada. It is more difficult to do this work in 13 provinces and territories, than to do it once nationally. As well, the lack of harmonization today leads to a high level of contamination due to consumer confusion about which materials are recycled.
- **Canada could export ideas and solutions from these CCME and provincial EPR programs to assist international efforts.** Many parts of the world and, indeed, even in the United States, such programs are not yet in place. Given that most marine litter (about 80%) enters the water from land, it is important to identify the major country sources and to offer help to divert materials or recover the energy from waste, rather than dumping in the sea. Urgent international action is required to prevent marine litter by funding waste infrastructure such as in Southeast Asia. There should be a balance between international and domestic efforts, given how urgent this issue is for some developing economies.

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- **Energy from Waste (EFW) has an essential role.** As an important final step, when there is residual plastic that is not suitable for recycling, Canada should be a leader in clean, safe EFW technologies. This is an appropriate option rather than burning new fossil fuels for energy.

We would be most pleased to meet with you to further discuss these results, ideas and suggestions for meeting Canada's goals. Please contact me for further information.

Sincerely,



Shannon Coombs
President

cc Jamie MacDonald, Minister's Office, Environment and Climate Change Canada
Marc D'Iorio, Director General, Environment and Climate Change Canada
Gwen Goodier, Executive Director, Chemicals, Environment and Climate Change
Canada