



**METRO VANCOUVER REGIONAL DISTRICT
SOLID WASTE AND RECYCLING INDUSTRY ADVISORY COMMITTEE**

**Tuesday, April 5, 2022
1:00 p.m.
Zoom Teleconference**

A G E N D A

1. AGENDA

1.1 April 5, 2022 Meeting Agenda

2. MINUTES

2.1 March 1, 2022 Meeting Minutes

3. MEETING OVERVIEW

3.1 Zoom Overview and Voting Process

Designated Speaker: Nanette van Doorn, Strategy and Stakeholder Relations

4. REPORTS

4.1 Metro Vancouver Contracts with Solid Waste and Recycling Industry Advisory Committee Organizations

Verbal Update and Written Report

Designated Speaker: Paul Henderson, General Manager, Solid Waste Services, Metro Vancouver

4.2 Conflict of Interest Update to Industry Advisory Committee Terms of Reference

“THAT all members forthwith file with the Chairperson(s) a written statement detailing all existing or potential conflicts that the member and the organization they represent may have in regards their relationship with Metro;

“THAT they timely update that statement to reflect any change of circumstances or if the Committee’s deliberations expose conflicts that may not have been initially apparent;

“THAT the Chairperson(s) compile a record of all reported conflicts and deliver such to all committee members and that such record will be neither confidential nor privileged;

Additional Resource
Included

“THAT any Committee Member or principal who does not have a conflict must file a NIL statement to that effect;

“THAT any member who fails to file the requisite statement and updates be forthwith excluded from the Committee and its deliberations until such time as he or she fully complies; and

“THAT the Chairperson(s) be vested with the power to remove any Committee Member whose actual or potential conflicts of interest are inconsistent with a fair and objective deliberation of the issues that may come before the Committee.”

4.3 Industry Advisory Committee Co-Chair Election (if required)

4.3.1 Voting Process

4.3.2 Nominations

4.3.3 Election

4.4 Waste Management Association of BC Meeting Minutes – March 25, 2020 – January 20, 2022

Designated Speaker: Paul Henderson, General Manager, Solid Waste Services

4.5 Zero Waste Committee Updates

4.5.1 Solid Waste Management Plan Update – Public/Technical Advisory Committee Applicant Evaluation Process

Verbal Presentation

Designated Speaker: Sandy Young, Senior Engagement Specialist, Solid Waste Services

4.5.2 Tipping Fee Bylaw Update: Construction and Demolition Processing Facility Residuals

Designated Speaker: Paul Henderson, General Manager, Solid Waste Services

4.6 Metro Vancouver Updates

4.6.1 United Boulevard and Central Surrey Recycling and Waste Centre Updates

Verbal Presentation

Designated Speaker: Paul Litt, Lead Senior Engineer, Solid Waste Operations, Solid Waste Services

5. INFORMATION ITEMS

5.1 Letter - Canada Gazette, Part I, Volume 156, Number 7: Recycled Content for Certain Plastic Manufactured Items Regulations

6. OTHER BUSINESS

Committee Co-Chair: Director Craig Hodge, Zero Waste Committee Vice Chair

Membership:

Abrams, Izzie - Waste Connections of Canada	Johnson, Gord - Empower Environmental/ Northstar	Polak, Mary - Waste Connections of Canada
Boora, Binder - BC Earth Exchange & Saskay Earth Exchange Ltd.	Kaminski, Jamie - HSR Zero Waste	Plotnikoff, Terryl - Canadian Mattress Recycling Inc.
Bryan, Lori - Waste Management Association of BC	Kawakami, Sean - Convertus Group	Prasad, Shad - Cascade Recovery +
Carrusca, Ken - Cement Association of Canada	Kiani, Aiden - Lock-Block Ltd.	Preuss, Kevin - K2 Services
Cheung, Mannie - Product Care Association of BC	Lotzkar, Jacqueline - Pacific Metals Recycling Inc.	Punja, Rustam - Geocycle Canada
Collins, James - Tymac Launch Service Ltd.	Mallari, Achilles - Sierra Waste Services Ltd.	Segal, Liliana - Green Chair Recycling
Dietrich, Christian, Ecowaste Industries	McAra, Matthew – GFL	Shore, Cynthia - Republic Services
Doorn, Josh van - Super Save Disposal	McRae, Ralph – Revolution	Stefenelli, Nicole - Urban Impact Recycling Inc.
Gill, Robbie - Cloverdale Fuel Ltd.	Millman, David - Waste Management of Canada	Wollen, Sebastian van - Blue Planet Recycling
Hankins, Grant - Waste Management Association of BC	Moucachen, Maya - Merlin Plastics	Zarbl, Michael - Major Appliances Recycling Roundtable
Ingram, Ken - West Coast Reduction Ltd.	Peers, Nicole - Queensborough Landing Recycling Depot	

Metro Vancouver and City of Vancouver Staff:

Allan, Chris – Metro Vancouver	Evanetz, Sarah – Metro Vancouver	Storry, Karen – Metro Vancouver
Atkinson, Brooke - Metro Vancouver	Henderson, Paul – Metro Vancouver	Underwood, Chris – Metro Vancouver
Belanger, Lynn – City of Vancouver	Litt, Paul – Metro Vancouver	Vidler, Lynne – Metro Vancouver
Doorn, Nanette van – Metro Vancouver	Massah, Mani – Metro Vancouver	Young, Sandy – Metro Vancouver
	McDermott, John – City of Vancouver	
	Pitre, Marcel – Metro Vancouver	

**METRO VANCOUVER REGIONAL DISTRICT
SOLID WASTE AND RECYCLING INDUSTRY ADVISORY COMMITTEE**

Minutes of the Regular Meeting of the Solid Waste and Recycling Industry Advisory Committee held at 1:00 p.m. on Tuesday, March 1, 2022, via Zoom Video Conference.

MEMBERS PRESENT:

Craig Hodge, Director, Metro Vancouver
Board of Directors (Co-Chair)
Izzie Abrams, Waste Connections of Canada
Binder Boora, BC Earth Exchange
Lori Bryan, Waste Management Assoc. of BC
Ken Carrusca, Cement Association of Canada
Mannie Cheung, Product Care Assoc. of BC
James Collins, Tymac Launch Service Ltd.
Jeremy Crawford, Waste Control Services
Christian Dietrich, Ecowaste Industries
Grant Hankins, Waste Management
Association of BC
Kenneth Ingram, West Coast Reduction Ltd.
Josh Jansen Van Doorn, Super Save Disposal
Gord Johnson, Empower
Environmental/Northstar
Sean Kawakami, Convertus Group
Aiden Kiani, Lock-Block Ltd.
Achilles Mallari, Sierra Waste Services Ltd.

Matthew McAra, GFL
Ralph McRae, Revolution
David Millman,
Waste Management of Canada
Maya Mouchachen, Merlin Plastics
Nicole Peers, Queensborough Landing
Recycling Depot
Mary Polak, Waste Connections of Canada
Terry Plotnikoff, Canadian Mattress
Recycling Inc.
Shad Prasad, Cascade Recovery+
Kevin Preuss, K2 Services
Rustam Punja, Geocycle Canada
Liliana Segal, Green Chair Recycling
Cynthia Shore, Republic Services
Nicole Stefenelli, Urban Impact Recycling
Sebastian van Wollen, Blue Planet Recycling
Michael Zarbl, Major Appliances Recycling
Roundtable

MEMBERS ABSENT:

Robbie Gill, Cloverdale Fuel Ltd.
Jamie Kaminski, HSR Zero Waste

Jacqueline Lotzkar, Pacific Metals Recycling
Inc.

METRO VANCOUVER STAFF:

Chris Allan, Director, Solid Waste Operations
Brooke Atkinson, Communications and Education Coordinator
Sarah Evanetz, Division Manager, Strategy and Stakeholder Relations
Paul Henderson, General Manager, Solid Waste Services
Mani Massah, Project Engineer, Zero Waste Implementation
Karen Storry, Senior Engineer, Zero Waste Implementation
Chris Underwood, Division Manager, Solid Waste Planning
Lynne Vidler, Lead Senior Engineer, Solid Waste Operations

CITY OF VANCOUVER STAFF:

Lynn Belanger, Manager, Transfer and Landfill Operations Branch
John McDermott, Manager, Solid Waste Strategic Services Branch

AGENDA:

Solid Waste and Recycling Industry Advisory Committee Meeting #1

March 1, 2022

1:00 PM – 3:00 PM

Zoom

Agenda

- 1) Meeting Objectives and Agenda
- 2) Committee Member Introductions
- 3) Industry Advisory Committee Overview
 - a) Overview of Terms of Reference
 - b) Committee Members Contact Information
 - c) 2022 Meetings
 - d) IAC Webpage
 - e) Co-Chair Election Process
- 4) Potential Industry Advisory Committee Meeting Standing Agenda Items
 - a) New Facility Updates
 - b) Operational Updates
 - c) Solid Waste Management Plan
 - d) Zero Waste Committee Reports of Interest
 - e) City of Vancouver Operational Updates
- 5) Committee Areas of Interest
- 6) Environment and Climate Change Canada Technical Issues Paper on Recycled Content for Certain Plastic Manufactured Items – Presentation
- 7) Next Steps
 - a) Next meeting is on April 5, 2022

References:

- 1) IAC 2022 Committee Members List: <http://www.metrovancouver.org/services/solid-waste/SolidWastePublications/SolidWasteRecycling-IAC-2022MembershipList.pdf>
- 2) IAC Terms of Reference: <http://www.metrovancouver.org/services/solid-waste/SolidWastePublications/ToR-IAC.pdf>

MEETING MINUTES:

1. WELCOME

Craig Hodge, Co-Chair, called the meeting to order at 1:01 p.m. and welcomed attendees to the Solid Waste Industry and Recycling Advisory Committee (IAC) meeting.

2. INTRODUCTION OF AGENDA AND MEETING OBJECTIVES

Co-Chair Hodge introduced the agenda and asked members to introduce themselves. A round of self-introductions was held, and Metro Vancouver and City of Vancouver staff were introduced.

Brooke Atkinson, Communications and Education Coordinator, Metro Vancouver, reviewed Zoom functions and etiquette, noting that the meeting would be recorded and provided to a non-member who asked to observe the meeting.

3. INDUSTRY ADVISORY COMMITTEE OVERVIEW

Brooke Atkinson provided an overview of the IAC and highlighted:

- IAC Terms of Reference
- Committee member contact information sharing
- The 2022 meeting schedule
- The IAC webpage
- Under the Terms of Reference, a second Co-Chair is elected by Committee members on an annual basis.

Paul Henderson, General Manager, Solid Waste Services, Metro Vancouver, reviewed the Co-Chair election process and highlighted that the process will be based on the Sturgis method:

- Nominations for Co-chair to be put forward by Committee members at the April 5, 2022 meeting
- One individual from each organization votes
- Members will vote for nominees in alphabetical order by last name
- Members vote for the nominee or nominees of their choice with a show of virtual hands (members may vote for each and every nominee)
- Following the first round of voting, if the leading nominee has less than 50% + 1 of the votes, voting will continue until a nominee achieves 50% + 1 votes with the nominee with the least votes dropping out in each round.

During discussion, the following motion was presented by Committee member Ralph McRae:

“THAT all members forthwith file with the Chairperson(s) a written statement detailing all existing or potential conflicts that the member and the organization they represent may have in regard to their relationship with Metro Vancouver;

THAT they timely update that statement to reflect any change of circumstance or if the Committee's deliberations expose conflicts that may not have been initially apparent;

THAT the Chairperson(s) compile a record of all reported conflicts and deliver such to all Committee members and that such record will be neither confidential nor privileged;

THAT any Committee member or principal who does not have a conflict must file a NIL statement to that effect;

THAT any member who fails to file the requisite statement and updates be forthwith excluded from the Committee and its deliberations until such time as he or she fully complies; and

THAT the Chairperson(s) be vested with the power to remove any Committee member whose actual or potential conflicts of interest are inconsistent with a fair and objective deliberations of the issues that may come before the Committee."

Co-Chair Hodge ruled the motion a notice of motion to be voted on at the April 5, 2022, IAC meeting.

Paul Henderson noted that depending on the Committee's decision on the above motion at the April 5 meeting, the second Co-Chair election could be delayed.

4. POTENTIAL IAC STANDING AGENDA ITEMS

The following potential IAC standing agenda items were described:

- New facility updates
- Operational updates
- Solid Waste Management Plan
- Zero Waste Committee reports of interest
- City of Vancouver operational updates.

Paul Henderson noted that these standing agenda items mirror standing items from meetings held with the Waste Management Association of B.C. that began to help coordinate pandemic response in 2020 and have been ongoing since.

In response to a question, it was noted that future meetings would provide opportunities for Committee members to request Metro Vancouver staff provide information on any Zero Waste Committee report of interest.

Action: *It was requested that Metro Vancouver provide Committee members records related to Metro Vancouver meetings with the Waste Management Association of BC.*

COMMITTEE AREAS OF INTEREST

Committee members were invited to participate in an online Mentimeter exercise to help identify areas of interest for future discussion. It was noted that the Committee workplan

- Plastic packaging in Canada will be required to contain at least 50% recycled content by 2030
- Proposed item categories:
 - Packaging in direct contact with food (e.g., beverage containers)
 - Packaging not in direct contact with food (e.g., bottles, rigid containers and trays, foam packaging, film and flexible plastic packaging, garbage bags)
 - Durable items (e.g., waste bins)
- Proposed excluded items:
 - Primary food packaging (except beverage containers)
 - Certain types of reusable packaging
 - Certain product applications where legal requirements do not allow for recycled content and/or there is risk for human health or the environment
- Draft high-level feedback:
 - Metro Vancouver supports the Government of Canada to develop recycled content regulations to reduce pollution and create conditions for achieving a circular economy
 - It is believed that the regulation should consider both pre-consumer and post-consumer recycled content with a maximum limit to the amount of pre-consumer content
 - With respect to sources of recycled content, circular recycling technologies that have a low environmental impact and local economic benefits should be prioritized
 - Do not allow the trading of recycled content as part of a credit system, which could mean that an end product may contain no recycled content
 - Beyond recycled content requirements, the Government of Canada is encouraged to look into current collection challenges for items such as foam plastics.

During discussion, comments were provided regarding:

- Recycled content requirements and labelling must be clear to avoid “greenwashing”;
- In parallel to considering regulations for recycled content, the government should support industry through funding or other mechanisms to further develop plastics remanufacturing capacity in Canada; and
- Implementation of recycled content regulations must consider the availability of recycled materials.

IAC members were invited to submit additional feedback to mani.massah@metrovancover.org before the end of the public comment period on March 14, 2022.

6. NEXT STEPS

Co-Chair Hodge thanked Committee members for their participation and advised that the next meeting was scheduled to occur on April 5, 2022.

7. ADJOURNMENT

The Solid Waste and Recycling Industry Advisory Committee meeting adjourned at 2:28 p.m.

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Solid Waste and Recycling Industry Advisory Committee – Zoom Overview and Voting Process

Zoom Information for Committee Members and Staff:

- All committee members, Solid Waste Services and City of Vancouver Staff will receive a zoom link in the meeting invitation
- This link **should not** be shared with anyone else

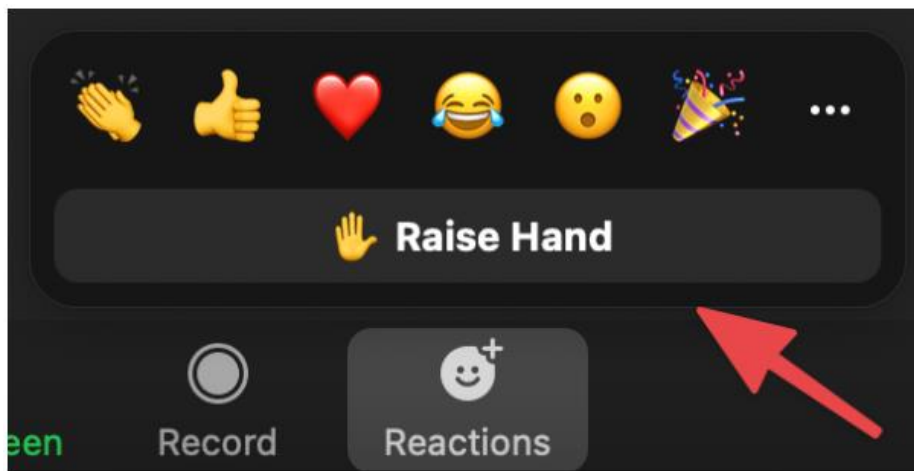
Public Observers:

- The zoom meeting will be recorded for meeting minute purposes and in order to share it with members of the public who request the opportunity to observe the meeting
- The public can request to view the committee meetings as an observer through the solidwasteoperations@metrovancover.org email

Committee Members Audio:

- Committee members audio will be turned off and controlled by the meeting host
- If committee members would like to speak, they can do so through the chair by raising their hand
- Raising a hand can be done through the following steps in zoom:

- 1) Click on the “Raise Hand” function at the bottom of the zoom screen:



- 2) The chair will call upon you to speak and the host of the zoom meeting will invite you to unmute (a pop up will appear in your zoom window) the committee member to speak, once finished speaking, the host will lower the committee members hand and turn them back on mute.

General Procedure for Handling a Motion:

Follows Robert's Rule of Order for handling a motion:

- 1) A member must obtain the floor by raising their hand (zoom function) and being recognized by the chair.
- 2) Member makes a motion.
- 3) A motion must be seconded by another member before it can be considered
- 4) If the motion is in order, the chair will restate the motion and open debate (if the motion is debatable).

Debate is closed when:

- 1) Discussion has ended, or
- 2) A 50% + 1 vote closes debate
- 3) The chair calls for a vote.

Voting Process:

Voting will take place in the following circumstances as outlined in the Solid Waste and Recycling Industry Advisory Committee [Terms of Reference](#):

1. annual election of the co-chair;
 2. updates to the terms of reference
 3. confirmation of the annual workplan; and
 4. during the appeal of member's dismissal, as described in section 10 of this Terms of Reference.
-
- 1) The chair will raise the item to be voted on in the meeting as an agenda item.
 - 2) Members will vote by raising their hands either in favour or opposed.
 - 3) Metro Vancouver staff will read aloud every committee members name that voted in favour or opposed.
 - 4) Metro Vancouver staff will take count of the votes and verbally say how many votes were cast in favour or opposed.
 - 5) The votes in favour and opposed will be reflected in the meetings minutes.
 - 6) Only one committee member can represent an organization, if there is an organization with more than one committee member, only one can cast a vote.
 - 7) Voting will be a 50 +1% majority decision-making model of votes cast.

Co-Chair Election Process:

- 1) The Chair calls for committee member nominations from the floor.
- 2) The Chair lists the names of the nominees in alphabetical order by last name.
- 3) The Chair asks who is in favour of voting for the nominee to cast their vote by raising their hand in zoom.

- 4) Metro Vancouver staff will verbally go through each committee members name that voted in favour.
- 5) Metro Vancouver staff will verbally say the number in favour.
- 6) This process is repeated for each nominee in alphabetical order by last name.
- 7) Committee members can vote for as many nominees as they choose to, with the committee member with the lowest votes cast in favour from each round dropped off the next round, until one nominee gets 50% + 1 votes in favour.

To: Solid Waste and Recycling Industry Advisory Committee

From: Paul Henderson, General Manager, Solid Waste Services

Date: March 28, 2022 Meeting Date: April 5, 2022

Subject: **Metro Vancouver Contracts with Solid Waste and Recycling Industry Advisory Committee Organizations**

EXECUTIVE SUMMARY

The Solid Waste and Recycling Industry Advisory Committee (Industry Advisory Committee) provides a forum for industry contribution, discussion and advice on management planning, operations and policy issues related to solid waste and recycling services in Metro Vancouver. A terms of reference outlines how the Industry Advisory Committee functions. At the inaugural meeting on March 1, 2022, a notice of motion was initiated to update the terms of reference to require member statements related to conflict of interests. This report provides a list of Industry Advisory Committee members' companies contracting with Metro Vancouver in the last three years. Payment values to each of Metro Vancouver's contractors are available on the internet in Metro Vancouver's annual Statement of Financial Information.

PURPOSE

The purpose of this report is to communicate the names of organizations with members of the Industry Advisory Committee that have contracted with Metro Vancouver within the last three calendar years.

BACKGROUND

The Solid Waste and Recycling Industry Advisory Committee Terms of Reference governs the function of the Industry Advisory Committee. The terms of reference may be updated through a majority vote by members.

The inaugural Industry Advisory Committee meeting was held on March 1, 2022. At that meeting, a member put forward a motion to update the terms of reference to require member statements related to conflicts of interest. The Co-Chair ruled the motion a notice of motion to be voted on at the April 5 meeting. This report communicates the names of the organizations with Industry Advisory Committee members that contract with Metro Vancouver.

METRO VANCOUVER CONTRACTS WITH INDUSTRY ADVISORY COMMITTEE ORGANIZATIONS

Metro Vancouver is made up of four legal entities providing a range of services across the region. Each year Metro Vancouver publishes a Statement of Financial Information on the internet listing all entities contracting with or otherwise receiving payments from any of the four legal entities (<http://www.metrovancouver.org/services/financial-services/programs-budget/BudgetPublications/2020PublicList.pdf>). Names of organizations and annual payment amounts are included in the list. The most recent report (2020) lists approximately 900 entities that receive payments from one or more of the legal entities. A number of organizations with members on the Industry Advisory Committee have contracted with at least one of the Metro Vancouver

entities within the last three calendar years. In addition to member organizations listed included in the Statement of Financial Information, extended producer organizations participating in the Industry Advisory Committee have service contracts with Metro Vancouver that include payments to Metro Vancouver.

The following is a list of entities with Industry Advisory Committee members that have contracted with Metro Vancouver over the last three years.

Organization
BC Earth Exchange
Cloverdale Fuel Ltd.
GFL
HSR Zero Waste
K2 Services
Lock-Block Ltd.
Major Appliances Recycling Roundtable
Product Care Association of BC
Republic Services
Saskay Earth Exchange Ltd
Waste Management of Canada

CONCLUSION

The Industry Advisory Committee provides a forum for engagement with the solid waste and recycling industry. At the inaugural meeting of the Industry Advisory Committee, a notice of motion was initiated to update the terms of reference to require member statements related to conflicts of interest. This report lists organizations with Industry Advisory Committee members that contract with Metro Vancouver.

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METRO VANCOUVER SOLID WASTE AND RECYCLING INDUSTRY ADVISORY COMMITTEE**CONFLICT OF INTEREST UPDATE
TO TERMS OF REFERENCE**

Good governance at any level and for any purpose demands both transparency and full, true and plain disclosure of conflicts of interest which may motivate or inform any positions participants may take.

That concept is reinforced by section 9.2 of our Terms of Reference, which requires all members to “speak honestly and transparently.”

But when I reviewed our Terms of Reference, I could not identify any requirement for Committee members to disclose pertinent conflicts of interest.

As there are currently no conflict disclosure requirements that govern this committee, before we take any further steps, I feel compelled to make a motion under section 6 of the Committee’s Terms of Reference, that the Terms of Reference be updated to add the following before the Committee’s next meeting:

“THAT all members forthwith file with the Chairperson(s) a written statement detailing all existing or potential conflicts that the member and the organization they represent may have in regards their relationship with Metro;

“THAT they timely update that statement to reflect any change of circumstances or if the Committee’s deliberations expose conflicts that may not have been initially apparent;

“THAT the Chairperson(s) compile a record of all reported conflicts and deliver such to all committee members and that such record will be neither confidential nor privileged;

“THAT any Committee Member or principal who does not have a conflict must file a NIL statement to that effect;

“THAT any member who fails to file the requisite statement and updates be forthwith excluded from the Committee and its deliberations until such time as he or she fully complies; and

“THAT the Chairperson(s) be vested with the power to remove any Committee Member whose actual or potential conflicts of interest are inconsistent with a fair and objective deliberation of the issues that may come before the Committee.”

I understand a vote of “50% of members present, plus 1” is required to pass this motion. Any vote on should record those in favour or against, by name.

I should caution that failure to implement these provisions threatens to turn this proceeding into a mockery and severely undermine any conclusions drawn from it. It is much better to deal with this up front than it is to waste our collective time only to subject ourselves to criticism later.

*Solid Waste Services**Tel. 604 432-6400 or via Email/Fax 604 451-6180*

March 14, 2022

File: CP-16-02-081

Tracey Spack, Director
Plastic Regulatory Affairs Division
Environment and Climate Change Canada
351 Saint-Joseph Boulevard
Gatineau, Quebec K1A 0H3
VIA EMAIL: ContenuRecycleRecycledContent@ec.gc.ca

Dear Director Spack:

**Canada Gazette, Part I, Volume 156, Number 7: Recycled Content for Certain Plastic
Manufactured Items Regulations**

We are writing to provide feedback to Canada Gazette, Part I, Volume 156, Number 7: Recycled Content for Certain Plastic Manufactured Items Regulations published February 12, 2022. Metro Vancouver is responsible for waste reduction and recycling planning, and the operation of a series of solid waste facilities in the region. Planning for less waste, improving reuse and recycling systems, and managing the remaining waste reflects the public's expectations of high environmental stewardship and affordable and accessible waste management.

Metro Vancouver supports the Government of Canada's development of recycled content regulations to reduce pollution and create conditions for achieving a circular economy. We applaud your leadership in taking action towards a resource-efficient lifecycle management approach to plastics in the economy. Recycled content regulations will help Metro Vancouver achieve our goal of increasing our regional plastic diversion rate of 22%.

Scope of application

We support minimum recycling content requirements for the selected plastic manufactured items and encourage the Government of Canada to consider increasing the required minimum recycled content at a pace which matches Canadian plastic recycling capacity and technology availability. The collection, sorting, recycling and manufacturing infrastructure in Canada will need to be scaled up to meet the recycled content requirements outlined in the technical issues paper. Otherwise Canada is at risk of being over reliant on foreign recycling processing markets, which does not necessarily support a Canadian circular economy. We encourage the Government of Canada to develop supporting initiatives like the [CleanBC Plastics Action Fund](#), which supports British Columbia businesses to create new value from used plastics.

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Product-based approach

We support an approach that targets all products of a similar category. This could encourage industry to switch to plastics that are better suited to include recycled content. In contrast, requiring only some types of plastic to have recycled material could result in industry switching to unregulated, harder-to-recycle resins.

Product scope

We support adding recycled content to the items in the technical issues paper and we encourage the Government of Canada to add items to this list as the regulation evolves. We agree with the implementation of a phased approach which first targets products like packaging and durable items that have been identified as ready for recycled content. Additional Items to be considered may include recycling-ready automotive components like bumpers or other durable goods like plant tags, outdoor furniture, sheds, fencing, outdoor tools (like snow shovels and gardening tools) and playground structures (indoor and outdoor).

As mentioned in the technical issues paper, certified compostable plastics cannot practically use recycled content. Based on our consultation with organics processors in the region, compostable plastics generally demonstrate poor disintegration in their facilities. We believe that only plastics that have demonstrated no negative impacts to the environment, have satisfactory disintegration and biodegradation in Canadian composting facilities, and are widely accepted by Canadian composting facilities, may be labelled as “compostable”. Plastics labelled “compostable” that do not meet these requirements should not be permitted for sale in Canada.

“Drop-in” biobased plastics should not be exempt from recycled content regulations. Exempting biobased “drop-in” plastics could put additional strain on resources needed to create virgin biobased plastics. For example, using agricultural waste for bioplastics could reduce affordable access to soil amenders. And growing crops to produce biobased plastics could have significant financial and social impacts on the global food system.

We support reusable alternatives being exempted as a way to incentivize companies to increase the use of reusable packaging relative to single-use packaging. However, in order to be exempted on the basis that their packaging meets an appropriate reusable packaging performance standard, the regulated parties must have reverse logistics for consumers in place. In the absence a convenient way for consumers to return reusable packaging, it will likely be recycled or disposed of.

We encourage the Government of Canada to consider the application of minimum recycled content requirement regulations for other material categories. Specifically, this could include a requirement for paper shopping bags in Canada to contain a minimum of 40% recycled content. This requirement would minimize the environmental impact of substitution effects that will result from Canada’s proposed ban on single-use plastic shopping bags, and would increase the production and availability of paper bags with recycled content in Canada.

Post-consumer and pre-consumer recycled content

Recycled content regulations should consider both pre-consumer and post-consumer recycled content with a maximum limit to the amount of pre-consumer content. While diverting plastic manufacturing waste is important, the primary focus of recycled content regulations should be on increasing post-consumer recycled content. Pre-consumer recycled content requirements should not be implemented in a way that discourages regulated parties and their manufacturing partners from reducing manufacturing waste. Parties wishing to label their packaging as having recycled content should be required to clearly display the percentage of pre-consumer and post-consumer material.

Recycling Technologies

Chemical recycling technologies could offer solutions where mechanical recycling is not feasible. For example, composite construction materials or multi-layer packaging may contain different plastic types, coatings and layers of paper/metal that cannot be separated mechanically. At the same time, some chemical recycling technologies require greenhouse gas intensive processes and environmentally harmful chemical reagents/reactants. Circular recycling technologies that have a low environmental impact and high local economic benefits should be prioritized and incentivized in recycled content regulations and supporting recycling infrastructure investment programs.

Measurement and reporting

Based on the information provided in the technical issues paper, the mass balance chain of custody approach seems to be preferable for the reason of stimulating end markets for a range of products and packaging while providing flexibility for product manufacturers and importers amid fluctuations in quantity and quality of recycled plastics. However, the rules for the mass-balance chain of custody model must not be developed loosely, where recycled content claims do not align with the true recycled content of the final product. The book and claim chain-of-custody model is not preferable as it allows for the trading of recycled content credits resulting in products that may contain no recycled content. We encourage the Government to provide some flexibility in the type of tracking used so that new technologies such as blockchain can be adopted when feasible. In the development of the reporting system, it may be beneficial to collaborate with current EPR and Statistics Canada data collection systems that collect similar information.

Labelling Restrictions

We are encouraged by your commitment to addressing confusing plastic packaging labels such as “compostable”, “biodegradable” and “recyclable” as part of the Canada-wide Strategy on Zero Plastic Waste. We think this work is of critical importance and encourage the Government of Canada to prioritize it within that Canada-wide strategy. Misleading labels create confusion among Canadians as to how to recycle plastic packaging which can lead to contamination of recycling streams.

Additional Work to Reduce Plastic Waste and Increase Plastic Recycling in Canada

Based on 2018 waste composition data, plastic waste constitutes approximately 15% of the waste generated from the construction, commercial/institutional and residential sectors in the Metro

Vancouver region. By weight, approximately half of plastic wastes are films and synthetic textiles and one quarter is from the construction and demolition sector. We encourage the Government of Canada to consider additional programs and policies to transition these commonly disposed plastics towards more circular solutions.

A survey done by the City of Vancouver found that only 6% of residents surveyed return foam plastic to a depot for recycling. These items have been historically difficult to collect due to their low densities and because broken pieces are difficult to separate from other recyclables. We encourage the Government of Canada to consider additional programs and policies to reduce the overall amount of foam plastic managed through recycling.

Repairable consumer electronics and appliances with plastic components present an opportunity for plastic waste reduction. By design, many of these products cannot be repaired. We encourage the Government of Canada to advance additional measures such as right-to-repair legislation and durability standards which could extend product lifetimes, lead to reduced demand for new products and reduce plastic waste generation.

Thank you for taking the time to consider our input. Leadership from the Government of Canada is essential for Metro Vancouver to meet its waste reduction and recycling goals. Any questions related to this feedback may be directed to me by phone at 604-432-6400 or by email at Paul.Henderson@metrovancover.org.

Sincerely,



Paul Henderson, P.Eng.
General Manager, Solid Waste Services

PH/cu/mm