

February 6, 2020

City of Regina  
Water, Waste and Environmental Services  
2476 Victoria Ave  
Regina, SK S4P 3C8  
Email: jelford@regina.ca

Attn.: Dr. Juanita Elford

Re: Single-Use Plastics Consultation

Multi-Material Stewardship Western is pleased to be given the opportunity to provide some suggestions and recommendations with regard to the City of Regina's consultation on single-use plastics. Multi-Material Stewardship Western (MMSW) began operations on January 1, 2016, to help businesses meet their obligations under Saskatchewan's Household Packaging and Paper Stewardship Program Regulation. A not-for-profit organization based in Saskatoon, MMSW represents the steward members who provide financing for the delivery of recycling services for Waste Packaging and Paper (WPP) to Saskatchewan residents. MMSW has agreements with municipalities covering 82.2% of households in Saskatchewan. In 2018, these municipalities collected 42,352 tonnes of MMSW producers' post-consumer WPP material.

*Extend EPR, don't ban*

With regard to bans on single-use plastics, MMSW advocates for an expansion of provincial extended producer responsibility (EPR) programs to include single-use plastic items, including packaging-like products, prior to considering banning these items for use and sale at the municipal level. Wherever possible, we believe consistency across the province is crucial to achieving significant environmental outcomes and this is most relevant in terms of developing legislation affecting the types of materials permitted in the marketplace and collected through recycling programs.

We believe the first step should be to place as many of these items under a provincially regulated EPR program as possible to give them a chance to be responsibly managed before banishing them from the marketplace. Bans, too hastily applied, can often result in unintended consequences. Bans on the sale or use of items are typically most effective if applied at a national level, to the extent that they are needed at all, simply because producers' supply of products is typically national in scope. And if, for some reason, a national approach is not possible then it is our preference that they be applied at the provincial level to avoid local governments creating a patchwork of policies.

*Consider role of disposal bans*

We recommend that provinces augment provincial EPR policies with disposal bans to ensure these materials are kept out of landfills, to support increased recycling rates and to help overcome the economic disparity between the linear and circular economies for plastics. Disposal bans have been shown to be an effective complement to EPR policies. Recent European data indicates that countries with landfill restrictions on recyclable and recoverable materials, on average, have higher recycling rates

of plastic post-consumer material.<sup>1</sup> However, timing of their application is important. Disposal bans for recyclable materials should be introduced after provincial systems are in place to collect and recycle the banned items to ensure there is sufficient capacity to manage them.<sup>2</sup> The Canadian Council of Ministers of the Environment (CCME), in Phase 1 of its Canada-Wide Action Plan on Zero Plastic Waste, committed to developing best management practices for disposal bans of end-of-life plastics by December 2019, and we anticipate that this work may prove helpful to provincial governments considering this issue in the future.<sup>3</sup>

Also, the EU's Landfill Directive (part of the European Parliament's Circular Economy Package, passed in April 2018) uses landfill bans to augment EPR policies. It requires that, by 2030, municipal waste suitable for recycling or other recovery cannot be sent to landfill. It also requires that by 2035, the amount of municipal waste disposed to landfill must be reduced to 10% or less of the total amount of municipal waste generated.<sup>4</sup>

### *CCME Roadmap*

The federal government, with the CCME, has committed to developing a roadmap by December 2021 to address single-use and disposable plastics that are most commonly released into the environment. The roadmap will be informed by the federal government's science assessment of plastic pollution, which received media attention last week.<sup>5</sup> Whether these initiatives eventually result in bans on the sale or use of items, we support the careful, science-based approach being taken by the federal government and CCME.

Multi-Material Stewardship Western recommends that the City of Regina resist applying sale and use bans. In the meantime, by considering advocating for these items to be placed under a provincial EPR program and imposing provincial disposal bans, the City of Regina can make significant contributions to alleviating plastic pollution in Saskatchewan and demonstrate its leadership.

### *Public Procurement*

While not within the scope of the City of Regina's consultation, we would like to share some thoughts on the potential for public procurement to assist with recycling performance. We note that Phase 1 of the CCME's Zero Plastic Action Plan includes commitments to develop guidelines and tools for government procurement practices by December 2021. Local governments, such as the City of Regina, can play a role by developing their own public procurement policies. In the meantime, we recommend the UN Environment's 2018, *Building Circularity Into Our Economies Through Sustainable Procurement* as a

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<sup>1</sup> *Plastics – the Facts 2018: An analysis of European plastics production, demand and waste data*, by Plastics Europe, 2018 p. 35, [file:///C:/Users/cabel/Downloads/Plastics\\_the\\_facts\\_2018\\_AF\\_web.pdf](file:///C:/Users/cabel/Downloads/Plastics_the_facts_2018_AF_web.pdf).

<sup>2</sup> *A Vision for a Circular Economy for Plastics in Canada*, February 2019, p. 29, Smart Prosperity Institute, <https://institute.smartprosperity.ca/sites/default/files/report-circulareconomy-february14-final.pdf>

<sup>3</sup> "[Canada-Wide Action Plan on Zero Plastic Waste, Phase 1](#)", Canadian Council of the Ministers of the Environment, pages 5 and 8. Published June, 2019.

<sup>4</sup> [The Landfilling Directive](#) (1999/31/EC).

<sup>5</sup> See "[Canada-Wide Action Plan on Zero Plastic Waste, Phase 1](#)", Canadian Council of the Ministers of the Environment, June, 2019, "[Canada's Plastics Science Agenda](#)", Environment and Climate Change Canada, June 2019 and "[Draft Science Assessment of Plastic Pollution](#)", Environment and Climate Change Canada, January 2020.

reference source.<sup>6</sup> It provides best practices guidance and recommendations on how to embed circularity into sustainable public procurement and enumerates its many benefits, including the extent to which governments' purchasing power (averaging approximately 12% of GDP in OECD countries and up to 30% GDP in developing countries) can alter the economics of recycling and sustainability in general.<sup>7</sup>

### *Conclusion*

The proliferation of plastics in the environment and its impact on our oceans, lakes, and rivers has captured global attention and demands concerted action at all levels. Multi-Material Stewardship Western is pleased that the City of Regina is seeking solutions to this latest environmental threat and we welcome the opportunity to do our part on behalf of Saskatchewan producers. As explained throughout this letter, efforts to address these issues require provincial if not federal coordination and, as such, we do not recommend municipal action beyond advocating for change with higher levels of government.

Thank you for the opportunity to provide feedback on the City's Plastics consultation. Please do not hesitate to contact us if you have any questions.

Sincerely,

Multi-Material Stewardship Western

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<sup>6</sup> Building Circularity Into Our Economies Through Sustainable Procurement, UN Environment, 2018.  
[https://wedocs.unep.org/bitstream/handle/20.500.11822/26599/circularity\\_procurement.pdf?sequence=1&isAllowed=y](https://wedocs.unep.org/bitstream/handle/20.500.11822/26599/circularity_procurement.pdf?sequence=1&isAllowed=y)

<sup>7</sup> Ibid., p. 2.