



March 12, 2020

Via email only

Hon. Jonathan Wilkinson, P.C., M.P.
Minister of Environment and Climate Change
Environment and Climate Change Canada
200 Sacré-Coeur Boulevard
Gatineau QC K1A 0H3

Dear Minister Wilkinson,

Re: Banning non-essential, single-use plastics and moving toward zero plastic waste and plastic pollution prevention

The undersigned organizations are writing to provide our recommendations on the scope of the regulatory ban on harmful single-use plastics and complementary measures needed to curb the growing problem of plastic pollution.

As you know, your government has committed to a ban on harmful single-use plastics as early as 2021 where supported by scientific evidence and warranted, and to take other steps to reduce pollution from plastic products and packaging. The draft science assessment of plastic pollution confirms that plastic pollution is harming the environment, that negative effects will increase if current trends continue, and that action is needed to reduce macroplastics and microplastics that end up in the environment.

It is increasingly clear that the current “take-make-waste” production system is not sustainable. A new, zero-waste approach is urgently needed. Banning non-essential, single-use plastics is an important step toward improving the circularity of the Canadian economy. Immediate attention must be given to the types of plastic products that are most commonly found in the environment to help reduce harm to wildlife; that are known to be toxic and can leach into the environment or human bodies; and that contribute to the growing

problem of plastic waste going to landfill, including single-use bio-based and compostable plastics since they have not been proven to be less harmful or effective alternatives.¹

We therefore recommend a regulation under the Canadian Environmental Protection Act banning the following plastic items by 2021:

- **items banned by the EU Single Use Plastic Directive EU/2019/904: stirrers; straws; plates (including paper plates with plastic lining); cutlery (forks, knives, spoons and chopsticks); cotton swabs; balloon sticks; oxo-degradable plastics and beverage containers that do not have tethered caps and lids;**
- **bags;**
- **all forms of polystyrene and polyvinyl chloride (PVC) food and beverage containers; and**
- **plastic packaging made of mixed materials (i.e., multi-layered plastics).**

We further recommend the regulation include the following measures to address bottles, cups and lids, which contribute significantly to Canada's plastic pollution problem:

- **timelines to phase out single-use, individual-portion beverage containers, including cups and lids and plastic bottles, starting with containers not subject to a return deposit; and**
- **as a transitional measure, set 90 per cent enforceable collection targets for beverage bottles, and require reductions in the use of cups and lids, as the EU has done.**

As well, we recommend the regulation establish targets that promote extended producer responsibility for plastics not subject to the ban. For example:

- **establishing requirements for producers and retailers to meet enforceable collection/recycling targets for plastic waste streams not subject to the ban that should be reviewed and updated regularly;**
- **set reduction targets for single-use plastics not subject to the ban with timelines specific to various product categories;**
- **set reuse/reusables targets across sectors with timelines, and invest in reuse and refill models; and**
- **set medium- and longer-term goals to reduce virgin plastic production.**

¹ Although many plastics are labelled recyclable, compostable or biodegradable under certain conditions, the current volume of production combined with other processing barriers and the fact that they have the same polluting behaviour in the environment as non-recyclable or non-compostable plastic, means that products made from these materials should not be excluded from a ban.

Single-use plastics and other single-use materials are representative of our problematic “take-make-waste” linear system that is not serving our planet or our communities. A strong regulatory ban on non-essential, single-use plastics, including the measures recommended above, will help prompt the shift to a new system centred on reuse, refill and non-disposal product delivery models. Moreover, meaningful action on single-use plastics will support climate and biodiversity objectives: as a fossil fuel-dependent material, from extraction to disposal, plastic contributes to the climate crisis and threatens marine biodiversity.

Thank you for considering these recommendations. We would be pleased to discuss them with you or your staff and provide more information, as needed. We appreciate your leadership on this important issue and offer our support for effective action to prevent plastics from polluting our environment.

Yours truly,

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