



**President
Présidente**

Vicki-May Hamm
Mairesse
Ville de Magog, QC

**First Vice-President
Premier vice-président**

Bill Karsten
Councillor
Halifax Regional
Municipality, NS

**Second Vice-President
Deuxième vice-président**

Garth Frizzell
Councillor
City of Prince George, BC

**Chief Executive Officer
Chef de la direction**

Brock Carlton
Ottawa, ON

10, rue Rideau Street,
Ottawa, Ontario

**Mailing address/
adresse postale**

24, rue Clarence Street,
Ottawa, Ontario K1N 5P3

T. 613-241-5221
F. 613-241-7440

www.fcm.ca

April 26, 2019

Standing Committee on Environment and Sustainable Development
Sixth Floor, 131 Queen Street
House of Commons
Ottawa, Ontario
K1A 0A6

Reducing Plastic Pollution

Dear Committee Members,

The Federation of Canadian Municipalities (FCM) welcomes this opportunity to bring Canada's municipal voice to your study on plastic pollution.

FCM commends the federal government for making the reduction of plastic pollution a priority and bringing this issue to the forefront of the agenda at both the G7 and the Canadian Council of Ministers of the Environment (CCME) this past year. It is of crucial importance to municipalities. And an issue that many have been tackling locally through innovative strategies and solutions to waste management and collectively through resolutions brought to FCM and adopted by our Board of Directors, comprised of elected municipal officials from all regions and various-sized communities throughout Canada, to advance national action.

Over the past two years, plastic pollution has been the subject of five FCM resolutions, forming the basis of our policy and advocacy work, including our submission to the CCME last year on a Canadian plastic waste reduction strategy. In our submission, we acknowledge each order of government has an integral role to play in reducing plastic waste, and put forward a series of recommendations for federal action aimed at changing how plastics are used and managed, all with a goal of retaining value across their lifecycle.

Municipal Role and Leadership in Reducing Plastic Waste

Municipalities are best known for their role in collecting and processing recyclable materials through the Blue Box and segmenting other forms of waste to reduce Canadians' overall environmental impact. However, municipalities also develop local and regional waste reduction strategies, enforce local regulations and educate the public about sustainable consumption and waste management practices. Municipalities of all sizes across the country are taking action on plastic. Examples of leadership include:

- Vancouver's world-leading waste reduction strategy
- Innovative waste pricing in Beaconsfield, QC
- Textile waste recycling target in Markham, ON
- Toronto's circular economy procurement strategy
- Municipal-led shoreline cleanup efforts nationwide



Municipalities are also working with Canadian businesses to deploy innovative new technologies to address plastic waste in new ways, including through successful partnerships between FCM and the Government of Canada like the Green Municipal Fund and the Municipalities for Climate Innovation Program. These programs serve as a model for effectively and efficiently targeting and enabling local action. Solutions through these types of partnerships are replicable, scalable and adaptable to emerging environmental priorities, including better collecting and recovery plastics.

Many municipalities are also responding to global shifts in plastic waste management, including the recent move by China to significantly limit the amount of plastic and other recycled materials it will import. This has resulted in more in-depth examinations of the entire value chain to reassess the products coming into the Blue Box and new opportunities to add value to recycled materials downstream.

Addressing Plastic Pollution at the National Level

Each year at FCM's March and September Board meetings, and again at our Annual Conference in June, FCM's Board of Directors considers resolutions submitted by its member municipalities. Adopted resolutions represent municipal issues of national significance that fall within federal jurisdiction. Over the past two years, plastic pollution has been the subject of five FCM resolutions: the first, adopted in September 2017, urges the federal government to educate Canadians on the long-term consequences of plastics and work with other countries to establish a global approach in prohibiting single-use plastics (refer to Appendix 1). The second, adopted in March 2018, urges the federal government to develop a national strategy to mitigate and manage marine litter (refer to Appendix 2). The third, adopted at our Annual Conference in 2018, builds on the call for a national marine litter strategy, advocating for measurable national targets and support for coastal clean-up (refer to Appendix 3). The fourth, adopted last September, calls for a national strategy that seeks to eliminate plastic pollution in Canada (refer to Appendix 4). And the fifth, also adopted last September, calls for federal action on non-compostable identification stickers (refer to Appendix 5).

FCM's resolutions served as the basis for FCM's submission to CCME-led plastic waste reduction strategy submitted last fall to the Minister of Environment and Climate Change. The submission outlines 12 areas for federal action to reduce plastic waste, including regulating toxic and problematic products and setting national performance standards for Extended Producer Responsibility (EPR).

Federal Role in Reducing Plastic Pollution

Reducing plastic waste is a complex challenge and all orders of government will have a role to play, alongside industry and other stakeholders. The biggest issue right now from a municipal perspective is that there is a disconnect between the types of plastic continuing to enter the market in Canada and being collected by municipalities, and the ability for municipalities to recycle that material locally or find a market for it. In some cases certain types of plastic aren't recyclable, while in other cases, even though a product may be technically recyclable, local infrastructure may not be capable of recycling it or the product may not have value on the commodity market. Plastics materials without secondary uses, markets or producer-led plan for end-of-life are a major burden, ending up in municipal landfills, or worse, as litter, posing multiple threats to the environment and human health.

This is where we envision the federal government taking the lead in reducing plastic waste, and ultimately moving towards a circular plastic economy, whereby plastic products' lifecycles are maximized. For instance, the federal government has jurisdiction to **ban or regulate substances deemed to be toxic** under the *Canadian Environmental Protection Act*, including their manufacture, import and sale. FCM welcomed measures taken by the federal government to ban plastic microbeads and would welcome the introduction of additional regulatory measures aimed at reducing or banning the import, use and sale of problematic products such as plastics and plastic additives that cannot be feasibly collected and recycled.

FCM recommends the federal government also **create a common set of definitions and performance standards for plastic**. For example, the federal government can develop and enforce standards for the recyclability and compostability of packaging and plastic products, as well as performance targets for the amount of plastic that must be recovered and reused or recycled. This would help to create a regulatory framework for an integrated value chain – from virgin plastic resin production, to packaging manufacturing and product design, through to retail, collection, sorting, processing and reuse. This would help reduce the usage of single-use plastics and abandoning plastic products and packaging through the use of viable and environmentally friendly alternatives. There are a number of existing options the federal government has to establish common definitions and performance standards, including the *Canadian Environmental Protection Act* and the *Consumer Packaging and Labelling Act*.

By establishing national performance standards the federal government can enhance EPR. EPR makes the companies that import and sell plastic packaging/products responsible for the end-of-life management of those products, including the cost of running programs to collect and reuse or recycle them. EPR frameworks currently exist in most provinces and territories. However, existing frameworks differ widely and can be improved and better coordinated. It is important that federal action builds on and complements existing provincial and territorial frameworks, remaining flexible and acknowledging that different approaches may be required in different jurisdictions in order to respond to local needs.

And as Canada transitions to a circular plastics economy, **new investment will be required to assist municipalities and the private sector better collect, sort and process plastic**, including investments in state-of-the-art optical sorting facilities and the latest mechanical and chemical plastic recycling technologies. Municipalities are important partners in addressing plastic pollution and federal action that complements and enhances municipal action, will go the farthest to helping Canada meet national and international targets and lead to better outcomes for Canadians overall.

Conclusion

Reducing plastic waste and moving to a circular economy for plastics is a shared responsibility and will require a collaborative approach, including strong federal leadership and federal-municipal partnership. We also submit that in order for any strategies or policies to be effective, it must be informed by municipalities, have buy-in from municipal leaders, and include a clear role for municipalities in implementation. With each order of government playing its respective role, Canada can make real progress on reducing plastic pollution and adopting more resource-efficient approaches to managing plastic.

Thank you for this opportunity to share the municipal perspective on reducing plastic waste with the Committee. We look forward to further opportunities to share the municipal perspective on this important, but complex issue. If you have any questions or would like to discuss FCM's recommendations further, please contact Nicole Christy, Government Relations Advisor, at nchristy@fcm.ca or 613-907-6378.

Sincerely,

A handwritten signature in blue ink, appearing to read "Vicki-May Hamm", followed by a long horizontal line extending to the right.

Vicki-May Hamm
Mairesse, Ville de Magog
FCM President

APPENDIX 1: Single-Use Plastics in Canada (Adopted - September 2017 - Fort McMurray, AB)

WHEREAS, there has been more plastic created in the last ten years than was produced in the whole of the last century and this amount of plastic production is not sustainable;

WHEREAS, globally we are producing 300 million tonnes of plastic every year, half of which is for single use, with 8 million tonnes of plastic ending up in our oceans annually;

WHEREAS, plastic pollution is damaging the environment and our essential ecosystems; therefore, be it

RESOLVED, That the Federation of Canadian Municipalities urge the federal government to:

5. Ensure education on this matter takes place through the education systems and online packages informing Canadians of the inherent long-term consequences of plastics;
6. Work with other countries to establish a global approach in prohibiting single-use plastics and abandoning plastic products and packaging through the use of viable and environmentally friendly alternatives.

APPENDIX 2: Marine Litter (Adopted - March 2018 - Laval, Quebec)

WHEREAS, The United Nations Environmental Programme estimates that 8 million tonnes of the plastic produced globally every year finds its way into our oceans, food chains and ecosystems, damaging our health in the process;

WHEREAS, With over 202,080 kilometres of coastline, Canada has one of the longest interfaces with oceans and bodies of water of any country on the planet;

WHEREAS, Well designed laws can help reverse this global trend;

RESOLVED, That the Federation of Canadian Municipalities urge the federal government to develop a national strategy to mitigate and manage marine litter.

APPENDIX 3: Marine Litter (Adopted - June 2018 - Halifax, Nova Scotia)

WHEREAS, The United Nations Environmental Programme estimates that 8 million tonnes of the plastic produced globally every year finds its way into our oceans, food chains and ecosystems, damaging our health in the process;

WHEREAS, With over 202,080 kilometres of coastline, Canada has one of the longest interfaces with oceans and bodies of water of any country on the planet;

WHEREAS, Well designed laws can help reverse this global trend;

RESOLVED, That the Federation of Canadian Municipalities urge the federal government to develop a national strategy to mitigate and manage marine litter, which includes the following components:

1. Measurable national targets aimed at mitigating ocean plastics pollution, developed in consultation with all orders of government;
2. A federal program to support coastal clean-up operations in communities affected by marine litter;
3. A national public education and awareness campaign aimed at improving public understanding of the local and global environmental costs of marine litter, particularly plastics.
4. Federal efforts to enhance existing Extended Producer Responsibility (EPR) programs and policies that involve manufacturers, distributors and retailers in managing packaging and other waste throughout its entire life-cycle;
5. Support for innovation in waste management at the local level, including research, development of new technologies, demonstration projects and replication of the most promising technologies.
6. An evaluation of federal options to regulate packaging, including reducing the amount of packaging, setting minimum standards for recycled content or setting standards for recyclability.
7. Global leadership through international partnerships and collaboration.

APPENDIX 4: National Plastics Reduction Strategy (Adopted - September 2018 - Annapolis County, NS)

WHEREAS, Canada has the opportunity to become a waste reduction leader and has led the development of a new global treaty to combat plastic pollution, the Global Plastics Charter, discussed at the G7 meeting hosted by Canada in Charlevoix June 8-9th 2018;

WHEREAS, The G7 Countries have agreed to a Global plastics Charter that commits Canada to developing more resource-efficient and sustainable approaches to the management of plastics, that involves industry, academia, government and citizens;

RESOLVED, That the Federation of Canadian Municipalities (FCM) call on the Government of Canada to develop a national strategy that seeks to eliminate plastic pollution, with regulations aimed at:

1. Eliminating the use of problematic products and packaging that pollute our environment such as the industrial use of micro-plastics including, but not limited to, microbeads, needles, fibrous microplastics and fragments;
2. Reducing consumer and industrial use of single-use plastics, including, but not limited to, plastic bags, bottles, straws, tableware, polystyrene (foam), plastic tea bags, cigarette filters, and beverage containers;
3. Designing Implementing standards to ensure that products and packaging that are reusable, recyclable, or compostable (meeting minimum standards);
4. Incenting the reduction of waste, reusability of products and packaging, and ensuring all products and packaging can practically be reduced recycled;
5. Establishing consistent national definitions (e.g. circular economy, resource recovery and recycling), performance standards, and measurement protocols for achieving targets;
6. Developing a national single-use plastics reduction and recycling performance standard;
7. Establishing a national single-use plastics recycled content performance standard;
8. Supporting commodity markets that incent the use of secondary materials over virgin materials; and
9. Making the producers of products and packaging directly responsible for reducing resource consumption.

RESOLVED, That the Federation of Canadian Municipalities (FCM) call on the Government of Canada to:

10. Identify plastics and plastic additives that are toxic or cannot feasibly be collected and recycled and ban or regulate their import, use, and sale;

RESOLVED, That the Federation of Canadian Municipalities (FCM) call on the Government of Canada to develop a national strategy that seeks to eliminate plastic pollution, with regulations aimed at:

11. Setting national plastic reduction and recovery targets that are measurable and encourage a transition to a circular economy; and

12. Creating incentives for waste management systems and infrastructure that increase the recovery, reuse, recycling and composting of products and packaging.

APPENDIX 5: Non-compostable Produce Stickers (Adopted - September 2018 - Annapolis County, NS)

WHEREAS, Composting is available and encouraged in most communities and many backyards in Canada; and

WHEREAS, The use of plastic non-compostable identification stickers contaminates the finished compost in commercial and private compost facilities; therefore be it

RESOLVED, That the federal government change both domestic and import regulations related to food labeling to require vegetable-based ink, /food safe stamps or compostable stickers on all fruits and vegetables sold in Canada.