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Isabelle Dufour, Clerk
Standing Committee on Environment and Sustainable Development
Sixth Floor, 131 Queen Street
House of Commons
Ottawa, ON K1A 0A6
Sent by email to ENVI@parl.gc.ca

April 25, 2021
Re: Study on single-use plastics

Dear Mme Dufour,

Please accept the following written submission from Dream Zero Inc. related to the committee's study on single-use plastics.

We applaud the Canadian government for considering a single-use plastic ban, as we are confident it will have a tremendous impact on our natural environment, maintain the quality of our shared natural resources and create extensive economic opportunities.

DreamZero provides businesses and consumers with reusable solutions for food services and CPG categories. Our collective of cup and container programs have diverted over 100,000 single-use items from disposal. We are part of a growing industry that is committed to the transition to a circular economy.

Food containers and beverage packaging that is made of black plastics, mixed material compositions or foam are difficult to recycle and are easily discarded because they are made of low quality materials that have very little value outside of the intended single purpose and can pose health risks if reused beyond their intended single-use. Such products are not valuable enough to track and therefore become extremely difficult to recover.

We know that consumers prefer food or beverage packaging that is made of higher quality materials - in fact, 87% of Canadians express concerns over the effect of single-use packaging on the environment¹. A single-use plastic ban will act as a corrective action to our take-make-waste economy, prompting a planned circular transition of the Canadian economy. That plan has the potential to create jobs, raise the value of materials that are currently landfilled or incinerated, and protect people and the environment.

We ask that the Standing Committee on Environment and Sustainable Development

¹ <https://www.dal.ca/sites/agri-food/research/plastic-food-packaging--before-and-after-covid-19.html>

consider our points included below that we believe will reduce barriers for companies providing circular services, provide employment opportunities and improve the domestic manufacturing sector. We also ask that the committee consider defining the term “reusable” to preserve the integrity of the ban on single-use.

Encouraging Circular Services

The Canadian plastics economy is mostly linear. In 2016, an estimated 9% of plastic waste was recycled, 4% was incinerated with energy recovery, 86% landfilled, and 1% leaked into the environment. Startlingly, 47% of plastic waste in Canada comes from packaging² and over 22 million lbs of plastic enter the great lakes basin every year³.

This is not just pollution, but a severe economic loss.

Replacing low-quality single-use packaging with high-quality durable reusable packaging will present a number of challenges. High quality materials have some operations challenges (see the Manufacturing section below), and operational frameworks require a mechanism that will either transfer ownership (like a deposit) or establish a chain of custody that tracks borrowed items.

DreamZero represents Muuse in Canada, a world-wide, tech-enabled borrowing system of cups and containers that are accessed by members for a monthly subscription fee. By leveraging asset management technologies, the Muuse App prevents containers from entering the environment as a pollutant because of the financial penalties attached to each item it offers. For example, if a member does not return their cup, they are charged \$20.

The result of this service has direct cost savings for municipalities as the cups do not enter the waste stream, are made of higher quality materials (resulting in less health risks), and finally are very unlikely to enter the environment as a toxic pollutant. At end-of-life, our cup is 99% recyclable by weight, and consists of materials considered to have a high Material Circularity Indicator (MCI) score.

Despite the clear financial benefits of our business model, we compete with companies that do not consider end-of-life scenarios of their materials and the costs that are passed down to the municipalities and the taxpayer. This gives the sellers of these products a financial advantage that is unfair, and runs contrary to the goals of the Canadian government to protect our environment from pollutants.

We encourage the Canadian government to establish an incentive for companies to transform their packaging system to one that tracks their packaging from cradle to grave, and puts a financial incentive on the user to return the packaging.

² http://publications.gc.ca/collections/collection_2019/eccc/En4-366-1-2019-eng.pdf

³ Researchers study plastic pollution in Great Lakes, Rochester Institute of Technology
<https://www.rit.edu/news/researchers-study-plastic-pollution-great-lakes>

Local Manufacturing

Canada faces a critical turning point and a single-use ban provides an opportunity to not only meet our consumer demands but also support local manufacturing.

Currently, companies like ours are ushering in the transition to a reusable packaging based food service and CPG industry. At the early part of this transition we are experiencing a number of challenges that actually favor single-use.

Reusables tend to be heavier and more costly to transport than the competing single-use systems. For example our reusable cup weights 182g, while a single use cup weights only 18g. Similarly single-use cups pack at a rate of approximately 12:1, meaning that we can fit only 1,000 cups on a shipping pallet, while a pallet of single-use cups can carry 12,000 units.

This may on the surface appear to not favor a reuse system, but of course once our cups are in active rotation with consumers the single-use packaging industry requires an ongoing shipping of supplies far exceeding the energy requirements of reusables. The current plastics being used in single-use items are sent to landfill at end-of-life, further passing the costs of these products on to the taxpayers.

For some of our products it becomes environmentally beneficial after 11 uses, this number could be dramatically cut if our feedstock was collected locally, then processed and manufactured locally.

We ask the Canadian government to consider financial tools to encourage the local manufacturing of more durable packaging. The reusables industry requires stainless steel and polypropylene based cups and containers that can be produced locally to cut down on transportation emissions and can create local jobs and unique long-term career options.

The materials we use in our products have a high MCI score and are considered ideal stock for manufacturers looking for recycled content. This material is food safe and FDA Certified and therefore is considerably more valuable to manufacturers than single-use material compositions. By keeping ownership over all materials, we prevent the “leakage” or escape of materials into the natural environment or the incorrect waste-stream.

Despite these efforts, the lack of infrastructure in Canada to reprocess and manufacture materials causes some materials, Polypropylene for example, to be given a lower score. Currently only 5-10% of Polypropylene products are recycled in Canada⁴. The Ellen MacArthur

⁴ Guidance for the Reduction of Plastic Waste in Meetings and Events, Treasury Board of Canada Secretariat, Government of Canada
<https://www.canada.ca/en/treasury-board-secretariat/services/innovation/greening-government/guidance-reduction-plastic-waste-meetings-events.html>

Foundation indicates that if proper infrastructure were to exist then Recycled Polypropylene would increase in value considerably⁵.

Define “Reusable”

We ask that the Canadian government extend their green labelling standards to reusable packaging and make them enforceable.

Currently, there are single-use plastics manufacturers in Canada that have added the word “Reusable” to their mold while not changing the quality of material used in the product itself. These products are sold for a premium and perform no differently than those that are considered single-use. We believe this practice should be discouraged by the Canadian government through enforceable regulations.

The Competition Bureau has developed the “Environmental Claims: A Guide for Industry and Advertisers” in partnership with the Canadian Standards Association, to help businesses ensure their environmental advertising is not misleading⁶. We believe that these guidelines need to be turned into regulations that can be enforced.

The Reuse Systems Alliance defines a reusable item as one that can complete 100+ rotations of use⁷. Draft California legislation defines a reusable takeback program as having at least 780 cycles of cleaning and sanitizing⁸. We encourage the Canadian government to consider strong definitions of this terminology to prevent fraudulent claims and behaviors that will weaken any legislative measures.

⁵ The New Plastics Economy: of plastics & catalysing action, Ellen MacArthur Foundation, https://www.ellenmacarthurfoundation.org/assets/downloads/publications/NPEC-Hybrid_English_22-11-17_Digital.pdf

⁶ Environmental Claims: A Guide for Industry and Advertisers, Enforcement guidelines June 2008, Competition Bureau Canada and Canadian Standards Association, <https://www.competitionbureau.gc.ca/eic/site/cb-bc.nsf/eng/02701.html>

⁷ Global Performance Survey Guide, Reuse Systems Alliance <https://static1.squarespace.com/static/5f92d944fd9ea632022adf5d/t/605c89cb566b723937a3a10f/1616677328097/Privacy+Policy+-+Reuse+Systems+Alliance.pdf>

⁸ Sustainable Packaging for the State of California Act: Proposed Regulation, Department of Resources Recycling and Recovery

Conclusion

In closing, we would like to applaud the government's efforts to review a single-use plastics ban and to classify those plastics that are likely to enter into the environment as a toxin.

We strongly encourage the government to review its commitment to the long-term viability of the manufacturing and service sectors that can build a sustainable circular economy as it makes decisions concerning this ban.

Yours sincerely,

Scott Morrison
President, DreamZero Inc.
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About DreamZero

Since 2017 DreamZero has provided reusable options to companies and events looking for a waste-free solution to food and beverage service. We provide a service model to consumers to access reusable packaging in a more cost-efficient manner than single-use conventional options.

DreamZero has served street festivals, marathons, concerts, corporate headquarters, restaurants and cafes. We've generated thousands of dollars for charities through our partnerships by prompting users to donate their deposit.

DreamZero prioritizes local producers first before looking elsewhere for product offerings. Our goal is to help the local manufacturing industry transition to serving the circular economy and to have as minimal as possible impact on the environment while doing so.

DreamZero represents Muuse in Canada, the opinions expressed here do not necessarily represent those of Muuse or any of their stakeholders. Muuse is a tech-enabled tracking system for reusable packaging that helps members access and return packaging with minimal effort and costs.