



May 31, 2018

**SENT VIA EMAIL**

To: Prime Minister Trudeau  
Minister McKenna  
CC: Government of Canada's plastics consultation

Dear Prime Minister Trudeau and Minister McKenna,

### **Towards a Zero Plastic Waste Canada**

We are writing this letter in support of Environmental Defence and the Canadian Environmental Law Association as part of their national effort to request action to eliminate plastics from entering the environment.

In Canada, nearly 90 per cent of plastics end up incinerated, or in our landfills, lakes, parks and oceans. Once in the environment, they contaminate ecosystems, kill wildlife, and leach toxic chemicals. It's time for Canada to deal with its plastic production, waste, and pollution problem. It's time for government action.

Less than 11 per cent of all plastics are recycled in Canada. Voluntary, industry-led initiatives are not going to cut it. As long as making new plastics is cheap, the costs of collecting and recycling plastics is high, and dumping plastics into the environment is "free", the problem will get worse.

Canada needs strong waste policies that hold producers responsible, keep problematic plastics out of Canada, and dramatically increase the re-use and recycling of plastics.

Now is the time for a national waste reduction strategy - one that harmonizes performance standards, measurement protocols, and definitions from coast-to-coast-to-coast, and gets Canada to zero plastic waste by **2025**.

We call on the Canadian Government to:

1. Work with provinces, territories, municipalities and Indigenous governments to develop policies that keep plastics out of the environment:
  - i. Ban plastics and additives that are harmful, or challenging to recycle;

- ii. Establish product performance standards for innovative materials and alternative feedstocks where evidence clearly shows they are more sustainable;
  - iii. Harmonize provincial recycling targets to ensure 100 per cent of single-use plastics are captured and at least 85 per cent are recycled by 2025;
  - iv. Incent the reduction of waste and re-usability of products and packaging, and invest in alternative delivery systems and re-use models;
  - v. Establish a national 75 per cent recycled content standard for single-use plastics;
  - vi. Require enforceable Extended Producer Responsibility (EPR) legislation that makes companies financially and operationally responsible for collecting and recycling the materials they put on the market, and reducing resource consumption;
  - vii. Phase-out the export of poorly sorted plastic waste; and
  - viii. Take remedial action against plastics already accumulated in the environment.
2. Establish consistent definitions, standards and measurement protocols:
    - i. National definitions for circular economy<sup>1</sup>, resource recovery, recycling and Extended Producer Responsibility to harmonize waste policy across Canada; and
    - ii. Protocols for measuring and tracking progress towards targets and performance standards.
  3. Following the example of microbeads, take priority steps to declare problematic plastics (such as single-use plastics) toxic under the Canadian Environmental Protection Act (CEPA), and take preventative action to minimize environmental and human health risks by 2020.
  4. Build circularity into the federal government's public procurement policies:
    - i. Require that vendors provide closed loop solutions as part of providing goods and services; and
    - ii. Lead by example and ensure products and product packaging contains 75 per cent recycled content, and that vendors achieve a 100 per cent capture rate, and 85 per cent recycling rate for single-use plastics.

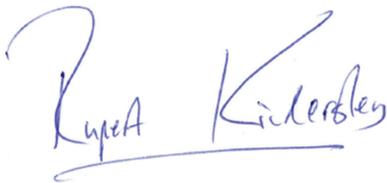
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<sup>1</sup> Per Baungart/McDonough a Circular Economy is an economy wherein products and materials should be designed with life cycles that are safe for human health and the environment and that can be reused perpetually through biological and technical metabolisms. This definition therefore does not consider incineration or waste-from-energy to be a form of resource recovery or recycling.

5. Demonstrate international leadership by championing a global treaty, built on the successful precedent of the Montreal Protocol:
  - i. Set an ambitious and inspiring goal of a circular economy with zero plastic waste by 2030;
  - ii. Establish guiding principles including prevention and precaution, the right to a healthy environment, and polluter pays;
  - iii. Establish product design standards including that all plastic must be recyclable, re-usable, or compostable, and banning harmful additives and problematic products;
  - iv. Adopt global targets for reducing plastic pollution; and
  - v. Build a global fund to support building a circular economy in the developing world.

The Georgian Bay Association (GBA) is an umbrella organization for 19 cottage associations along the east and north shore of Georgian Bay. We have been advocating on behalf of our land-owning members for over 100 years. Our mandate is to work with our water-based communities and other stakeholders to ensure the careful stewardship of the greater Georgian Bay environment.

Yours truly,

A handwritten signature in blue ink that reads "Rupert Kindersley". The signature is written in a cursive style with a horizontal line underneath the name.

**Rupert Kindersley**  
**Executive Director**