

What We Heard

Plastic and Single-Use Waste Reduction

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Prepared for the Ministry of Environment
and Climate Change Strategy
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EXECUTIVE SUMMARY

In 2019, the Ministry of Environment and Climate Change Strategy released the CleanBC Plastics Action Plan, which identified key areas for action to address plastic waste and pollution. The proposed waste prevention regulation is a component of this plan and supports the government's commitment to begin the phase-out of single-use plastics across British Columbia. In April 2022, the ministry released the *Preventing Single-Use and Plastic Waste in British Columbia Intentions Paper*, which outlined proposed restrictions for several problematic waste items in the province.

The ministry invited feedback on the intentions paper from British Columbians through a public engagement process, which consisted of two surveys (one for members of the public and one for businesses), as well as an open invitation for interested parties to provide written submissions outlining their responses to the intentions paper. The public engagement launched on April 22 and was open until July 5, 2022. During this time, the engagement received:

- 1,945 completed surveys from members of the public;
- 67 completed surveys from businesses in B.C.; and,
- 74 written submissions from Indigenous communities, local governments, industry and business, and non-governmental organizations.

Feedback collected through these channels was analyzed and compiled into this *What We Heard* report. This executive summary outlines the main findings from the engagement.

Of the people we heard from, most are in favour of restrictions and regulations to reduce single-use and plastic waste in B.C., including all four of the proposed measures included in the intentions paper. B.C. businesses are also concerned about single-use and plastic waste, and most of the respondents are supportive of general efforts to transition away from plastic and single-use products.

We heard that compostable plastics are a major challenge for local governments to address in their waste management programs and create inefficiencies in their waste management streams. As such, local governments were highly supportive of the proposed restrictions on compostable plastics. However, we also heard concerns from many members of industry regarding the banning of single-use items and packaging made from compostable plastics, as most of these submissions believed that compostable plastics should be considered an acceptable alternative to single-use items made from other problematic plastics. While there are challenges with effectively recycling and/or composting these materials in B.C. facilities, many industry groups felt that an approach to overcoming this issue is requiring certification of compostable products to establish a minimum standard. In addition, these submissions suggested greater investment in composting facilities would be needed to successfully breakdown certified items.

B.C. local governments hoped several other problematic waste items would be the focus of future policy. These included other non-food related uses of problematic plastics (polystyrene foam and polyvinyl chloride (PVC), flexible film and plastic overwraps, single-use beverage cups, construction waste, and more.

Both the public and businesses identified an opportunity for much greater use of reuse and refill systems at grocery stores, at prepared food establishments and within home cleaning supplies. The

biggest barriers to greater adoption of reuse and refill systems in these areas are concerns related to sanitation and hygiene, costs and lack of awareness of what is available under these systems.

Finally, we heard there remains a disconnect between local governments and the public, and industry and business, regarding the relative importance and usefulness of reduction, reuse, and recycling approaches to waste reduction. While many local governments and members of the public were supportive of the proposed efforts to reduce plastic and single-use waste in the province, many industry groups were concerned that bans or restrictions on these items could undermine recycling efforts. It was noted in several submissions that more than industry run recycling programs (known as, extended producer responsibility) are needed to prevent waste and to move B.C. to a circular economy.

TABLE OF CONTENTS

1	BACKGROUND AND INTRODUCTION.....	1
2	APPROACH AND METHODS	2
2.1	Engagement Process	2
2.1.1	<i>Survey Design and Administration</i>	2
2.1.2	<i>Written Submissions</i>	2
2.2	Data Analysis and Reporting.....	2
2.2.1	<i>Survey Data.....</i>	2
2.2.2	<i>Written Submissions</i>	3
2.3	Engagement Participants.....	3
2.3.1	<i>Public Survey Participants.....</i>	3
2.3.2	<i>Business Survey Participants.....</i>	4
2.3.3	<i>Formal Submissions.....</i>	6
3	WHAT WE HEARD.....	7
3.1	Overall Support for Approaches	7
3.1.1	<i>Restrictions on Single-Use Checkout Bags</i>	7
3.1.2	<i>Restrictions on Plastic and Single-Use Utensils.....</i>	9
3.1.3	<i>Restrictions on Foodservice Packaging Made from Problematic Plastics.....</i>	10
3.1.4	<i>Restrictions on Compostable Plastics.....</i>	11
3.2	Potential Impacts of Proposed Changes	12
3.3	Considerations for Exemptions	15
3.4	Communication and Education.....	16
3.5	Compliance and Enforcement.....	16
3.6	Future Steps to a Circular Economy	17
3.6.1	<i>Reuse and Refill Systems.....</i>	17
3.6.2	<i>Recycled Content Standards.....</i>	18
3.6.3	<i>Reuse and Recycling.....</i>	18

APPENDIX A : PUBLIC SURVEY QUESTIONNAIRE

APPENDIX B : BUSINESS SURVEY QUESTIONNAIRE

APPENDIX C: WRITTEN SUBMISSION GUIDELINES

1 BACKGROUND AND INTRODUCTION

Each year, billions of single-use items are discarded in British Columbia. Many of these single-use items are not recycled, as they are often small, may be difficult to collect, or are made from plastics that are hard to recycle. These items also account for the majority of collected items from beach cleanups in the province.

In recent years, the B.C. government has taken many steps to reduce and eliminate the use of single-use plastics. In 2019, the CleanBC Plastics Action Plan engagement highlighted four areas of focus for the Province to reduce plastic pollution in the environment. The outcome of that public engagement confirmed support to move forward with actions in the four key areas: banning single-use packaging, dramatically reducing single-use plastic in landfills and waterways, advancing extended producer responsibility (EPR), and reducing plastics overall. In July 2021, municipalities across B.C. were given authority to regulate specific single-use items under the Spheres of Concurrent Jurisdiction – Environment and Wildlife Regulation. To date, there are 19 municipalities across B.C. with bylaws banning or restricting some or all of these specific items.

Under EPR, producers are responsible for the costs of collecting and managing their products at end-of-life, as required by the Recycling Regulation under the *Environmental Management Act*. B.C. is the only province to hold producers wholly responsible for packaging materials, with more items due to be regulated between now and 2026, through the EPR Five-Year Action Plan¹. Despite having the broadest EPR regulations in the country, many single-use and plastic items remain challenging to recycle.

To address these problematic items in B.C. and complement the single-use item bans announced by the federal government in June 2022, the B.C. Ministry of Environment and Climate Change Strategy is proposing a new waste prevention regulation. The regulation will aim to limit and reduce the distribution of single-use and problematic plastic waste from checkout bags, foodservice accessories, and foodservice packaging made from polystyrene foam, PVC, and compostable plastic.

Prior to finalizing the new regulation, the Province sought feedback from the public and affected groups on these proposed measures through a public engagement process. Two online surveys were hosted on the [govTogetherBC](https://govtogetherbc.ca) platform, one for members of the public and one for businesses. In addition, the ministry accepted written submissions from a variety of affected groups, including Indigenous communities, local governments, industry associations and non-governmental organizations. The ministry also hosted a webinar for local governments to provide further information. This *What We Heard* report summarizes the findings from the engagement. In addition, the ministry received feedback from Indigenous communities on its proposed actions on plastics through the CleanBC Roadmap to 2030 virtual engagement sessions for Indigenous peoples, held in March 2022.

¹ Plastic Action Centre (2022). *Plastics in British Columbia Fact Sheet*. Plastic Action Centre. Retrieved July 21, 2022, from <https://plasticactioncentre.ca/directory/plastics-in-british-columbia/>

2 APPROACH AND METHODS

Given the extent to which plastic and single-use items are used, the engagement process sought to hear from as many groups as possible. Businesses and members of the public were invited to complete an online survey. In addition, written submissions were received from Indigenous communities, local governments, industry associations and non-governmental organizations (NGOs). To support this engagement process, the ministry contracted R.A. Malatest & Associates Ltd. to conduct data analysis and reporting.

2.1 Engagement Process

2.1.1 Survey Design and Administration

This engagement was comprised of two separate surveys to capture feedback across stakeholder groups. One survey targeted a public audience and the other targeted businesses.

Questions in the public survey focused on concern over single-use plastics in the province, checkout bags, foodservice accessories and packaging, compostable plastics, future opportunities, and barriers. Questions in the business survey focused on similar areas but also considered the effects on businesses of implementing the proposed single-use plastic regulation, consumer education and information, and opportunities for more circular business approaches. Copies of the surveys can be found in **Appendix A** (public survey) and **Appendix B** (business survey).

Both surveys were hosted on the govTogetherBC website and were available for completion from April 22 through July 5, 2022.

2.1.2 Written Submissions

Indigenous communities, local governments, industry associations and NGOs were invited to submit their feedback in written submissions to a dedicated email. Those providing written submissions were encouraged to structure their comments around a series of questions provided by the ministry on the engagement site; copies of these questions are provided in **Appendix C**. A list of all organizations or businesses that submitted letters as part of this engagement process is included in **Appendix D**.

2.2 Data Analysis and Reporting

2.2.1 Survey Data

All survey responses including open-ended comments were summarized using appropriate methods (e.g., frequencies, means, medians, etc.). Where supported by sample size and research questions², cross-tabulations and associated statistical tests of significance were conducted (e.g., comparing responses by region, age, or other demographics). The valid number of responses includes all those who provided a response to the question and excludes those who did not respond or selected 'Not sure / Prefer not to answer'.

² Groups were not compared if they had numbers of less than 50; for this reason, no cross-tabulations or group comparisons were done on the business survey data (which had a total *n* of 67). Cross-tabulations and comparisons were also limited to those related to *a priori* concerns identified by ministry staff at the start of the project. Specifically, the impact of region and living in a municipality with pre-existing regulations on single-use and plastic waste on attitudes towards the proposed measures.

Open-ended survey comments were reviewed and had thematic codes applied to them, according to an inductively developed coding framework. The coding framework was developed by lead researchers at Malatest, with review and input from ministry staff. Up to three codes were applied to each comment, as applicable. Codes were then summarized quantitatively (i.e., frequencies) to summarize the main themes and issues raised by survey respondents.

2.2.2 Written Submissions

Written submissions from Indigenous communities, local governments, and affected groups such as business associations and NGOs were qualitatively coded, with codes being created and applied as they were identified in the text of each submission. An initial coding framework was developed based on the first 15 documents received in the consultation process. This coding framework was then reviewed and refined as new submissions arrived. Every time a code was added or revised in the coding framework, previously coded submissions were reviewed to ensure consistency in coding across all documents.

2.3 Engagement Participants

A wide variety of interested parties and members of the public participated in this engagement through the various communication options available. This section summarizes the participants who engaged via each option.

2.3.1 Public Survey Participants

In total, 1,945 members of the public participated in this survey. Of these participants, slightly more than one-third were from the Vancouver Island and Gulf Island region (35%) and just under one-third were from the Vancouver Coastal region (29%). **Table 2.1** below summarizes public survey participants by region.

Table 2.1: Public Survey Respondents, by Region

Region	Proportion of Survey Sample n = 1,945	Proportion of B.C. Population n = 5,000,879 ³
Vancouver Island and Gulf Islands	35%	17%
North	6%	3%
Interior	15%	19%
Fraser and Vancouver Coastal (Mainland / Southwest)*	44%	61%

Source: *Plastic and Single-Use Waste Reduction Public Survey* and Statistics Canada's *Census Profile 2021* for economic development regions of B.C.

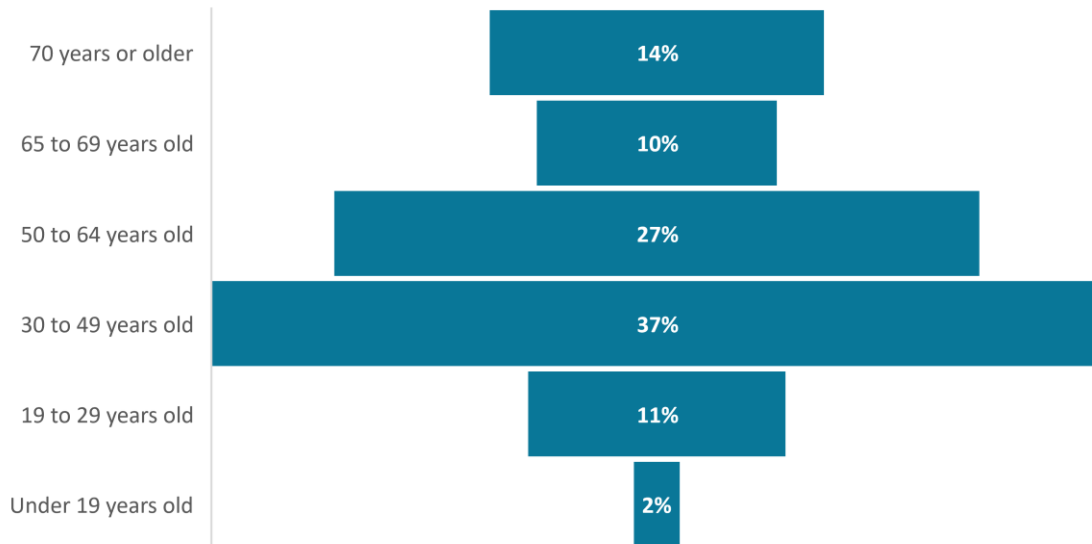
* Fraser and Vancouver Coastal regions from the survey were collapsed to be comparable to census economic development regions. Fraser respondents represented 15% of the sample, and Vancouver Coastal respondents represented 29% of the sample.

Valid n=1,945

When categorizing the participants by age group, over one-third (37%) were from 30 to 49 years of age and only a small portion (13%) were 29 years of age or under. **Figure 2.1** below represents a breakdown of all age groups among those that completed the public survey.

³ Statistics Canada. 2022. (table). *Census Profile*. 2021 Census of Population. Statistics Canada Catalogue no. 98-316-X2021001. Ottawa. Released Oct. 26, 2022.
www12.statcan.gc.ca/census-recensement/2021/dp-pd/prof/index.cfm?Lang=E (accessed Nov. 2, 2022).

Figure 2.1: Age Category of Respondent for Public Survey Respondents



Source: *Plastic and Single-Use Waste Reduction Public Survey*
Valid n=1941

Nearly three-quarters of participants identified as female (70%) and just over one-quarter identified as male (28%). A small number of participants (2%) identified as gender fluid, non-binary, or two-spirit.

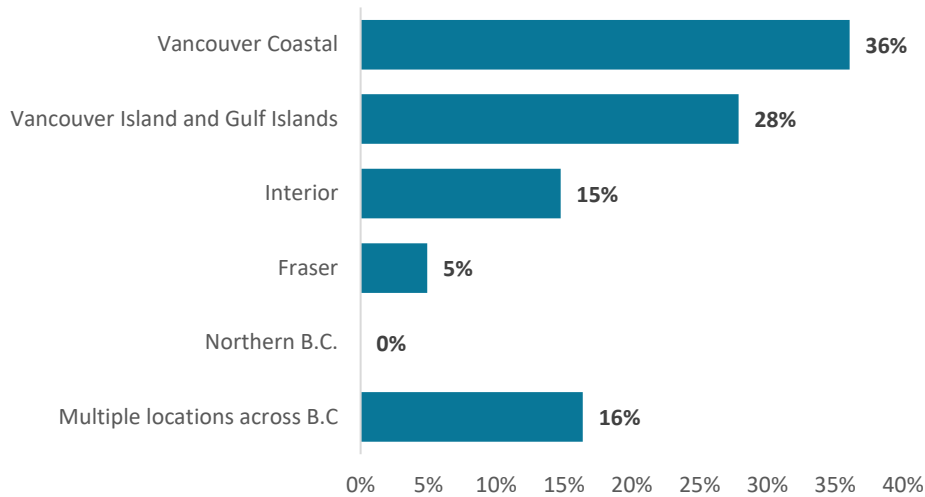
When asked about Indigenous identity, 54 out of 1,945 participants (3%) identified as Indigenous. This is considerably lower than the overall proportion of B.C. residents who identify as Indigenous (6% as of the 2021 Census of Population).

Slightly less than one-half of respondents (47%) reported that they lived in a municipality that has already restricted single-use items (to any extent). Slightly more than one-third of respondents (39%) lived in a municipality with no restrictions, and 14% were unsure of whether there were such restrictions in place in their municipality.

2.3.2 Business Survey Participants

For the business survey, there was a total of 67 participants. When asked which region their businesses operate in, slightly more than one-third (36%) indicated that they were based in the Vancouver Coastal region, and slightly more than one-quarter (28%) indicated that they operated in the Vancouver Island and Gulf Island region. There were no respondents to the business survey who reported having operations specifically within Northern B.C. **Figure 2.2** below represents a full breakdown of business survey participants by region.

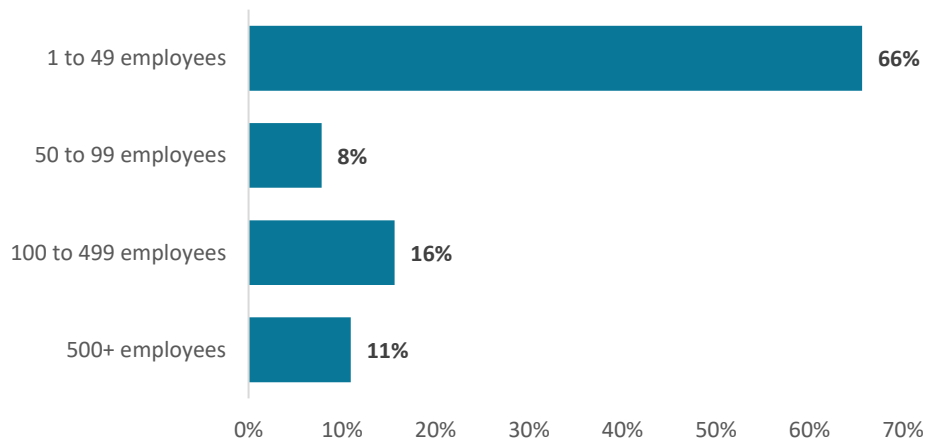
Figure 2.2: Region of Operation for Business Survey Respondents



Source: *Plastic and Single-Use Waste Reduction Business Survey*
Valid n=61

When asked about the size of their business, nearly two-thirds of participants (66%) indicated their business employed from one to 49 permanent staff. **Figure 2.3** illustrates the breakdown of business respondents, by their reported workforce sizes.

Figure 2.3: Workforce Size of Business Survey Respondents

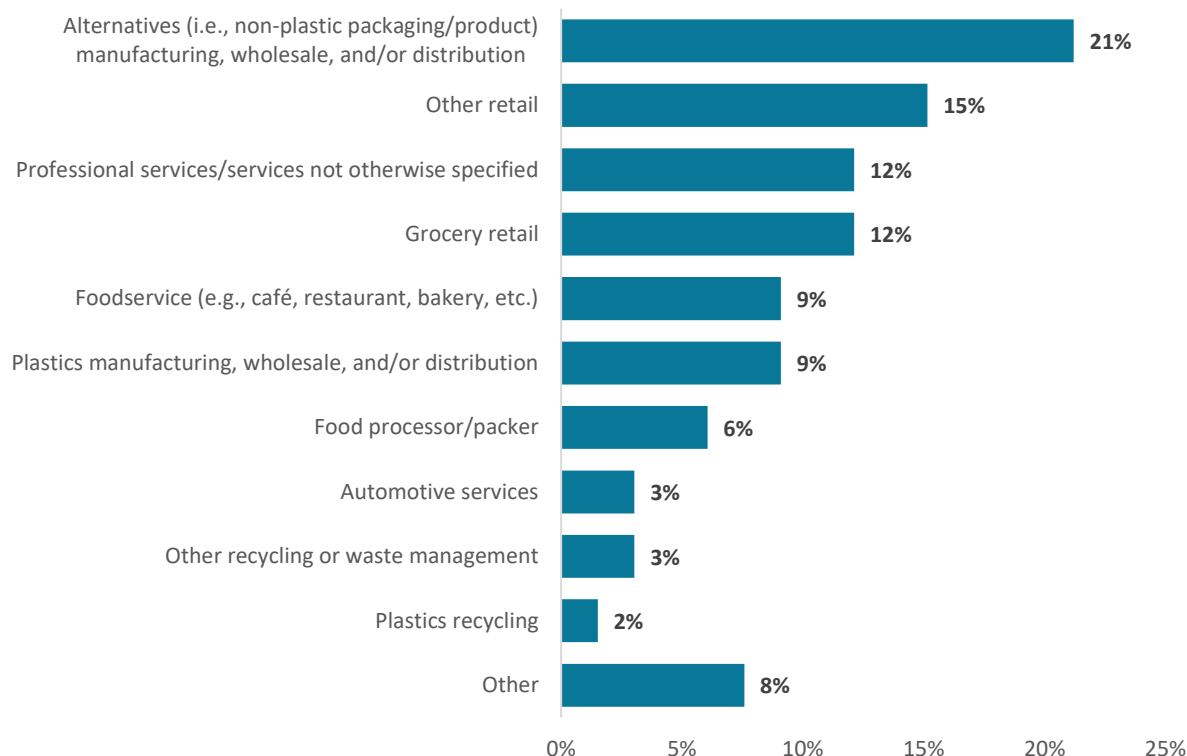


Source: *Plastic and Single-Use Waste Reduction Business Survey*
Valid n=64

Most businesses represented in the survey were not franchises. Only 6% of participants indicated their business was a franchise.

The single most common area of operation reported among business respondents was in the field of alternatives manufacturing⁴, wholesale and/or distribution (21%). **Figure 2.4** represents a breakdown of the main area of operations for business survey respondents.

Figure 2.4: Main Area of Operations for Business Survey Respondents



Source: Plastic and Single-Use Waste Reduction Business Survey
Valid n=66

2.3.3 Formal Submissions

Through the engagement period, the ministry received written submissions from 74 groups and interested parties. These groups included Indigenous communities, local governments, various affected industries, and industry associations (some of which represent hundreds of businesses), and non-governmental organizations. A breakdown of the submissions received, by group, is provided in **Table 2.2** below.

Table 2.2: Written Submissions Received, by Group

Group	Submissions Received
Indigenous communities	11
Local governments ⁵	19
Industries and associations	41
Non-governmental organizations (NGOs)	3

⁴ Businesses that manufacture items that can be used instead of plastic and single-use items.

⁵ Two submissions that were classified as “local government” were from regional health authorities.

It should be noted that the ‘industries and associations’ stakeholder group represented a variety of interests, including plastics manufacturers and distributors, alternatives manufacturers and distributors, recycling, and other waste management businesses, and affected industries such as foodservice, hospitality and retail. Non-governmental organizations were defined as non-profit or charitable organizations involved in advocating for public policy on social or political issues. In the case of this engagement, all NGO submissions were from environmentally focused organizations.

3 WHAT WE HEARD

3.1 Overall Support for Approaches

British Columbians participating in this engagement expressed high levels of concern regarding single-use items being wasted or thrown away in the province: roughly three-quarters of the public (75%) and businesses (78%) reported they are “highly concerned” about this issue.

Businesses were asked to rate their support for the transition away from plastic and single-use items. Of 63 respondents to this question, about two-thirds (67%) reported being mostly or completely supportive, while 19% were somewhat supportive and 14% reported low levels of support. Members of the public were asked to rate their support on each measure individually; each proposed measure had support from at least three-quarters (more than 75%) of respondents.

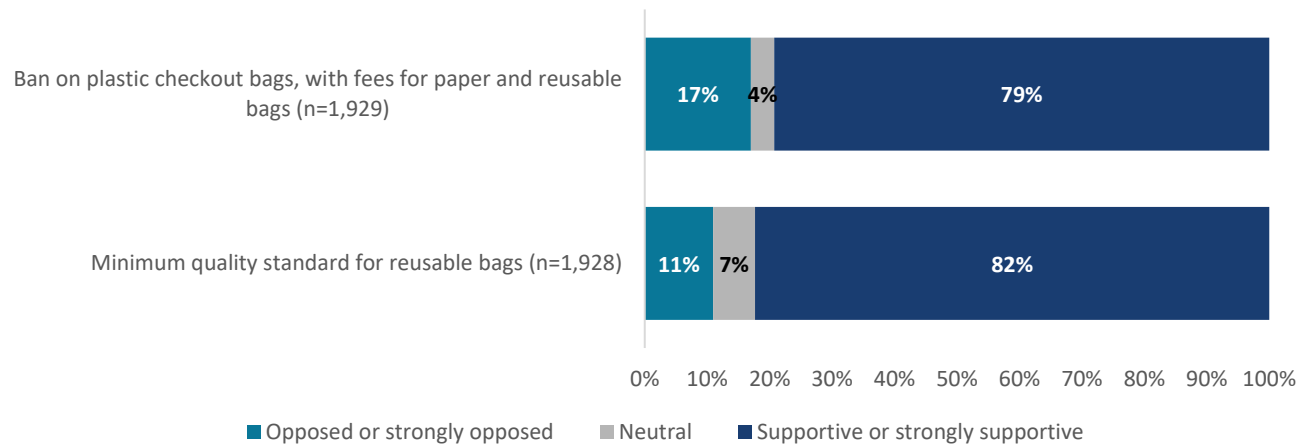
From written submissions, support for the proposed measures broke down similarly by group. Local governments, Indigenous communities, and non-governmental organizations (NGOs) largely supported the proposed measures and, in some cases, even suggested they did not go far enough to reduce plastic and single-use waste. In contrast, most submissions from industry and businesses stated they supported waste reduction efforts and moves to a circular economy, but they were largely opposed to nearly all the specific measures proposed in the proposed waste prevention regulation.

Further details on what we heard from engagement participants on each of these measures are discussed in the subsections below.

3.1.1 Restrictions on Single-Use Checkout Bags

Nearly four-fifths of respondents to the public survey (79%) supported or strongly supported the proposed restrictions on single-use plastic checkout bags, and the implementation of fees for paper and reusable bags, while fewer than one in five respondents were opposed. A similar proportion (82%) of respondents were in favour of a minimum durability standard for reusable bags – defined as being capable of withstanding 100 washes – compared to just 11% of respondents who were opposed.

Figure 3.1: Public Support for Proposed Restrictions on Checkout Bags



Source: Plastic and Single-Use Waste Reduction Public Survey
Valid n varies by item, please see figure for details.

Responses among written submissions to the proposed restrictions on single-use checkout bags were largely divided. All local governments and NGOs were supportive of restrictions on plastic checkout bags and fees for paper and reusable bags. Indigenous communities were mostly supportive of these changes or stated no comments or concerns, except for one Indigenous community that noted these changes may have negative impacts on a retail business they operate. Approximately one-half of industry and business responses commented on the proposed bag restrictions (n=22); of these, 14 were opposed to at least some aspects of these restrictions (e.g., fees for paper bags, bans on plastic checkout bags, insufficient exemptions for takeout and delivery services) while only two were openly supportive of the changes. Most of those opposed to at least some aspects of the single-use bag restrictions were retail, foodservice, and hospitality businesses or organizations. Concerns were around fees for single-use paper bags related to the increased cost for consumers, the inability for delivery services to offer alternatives to single-use paper bags, and the need for fees to be consistent across municipalities.

Six submissions from industry groups did not object to the ban on plastic checkout bags or the fees on single-use paper bags but did object to the inclusion of compostable plastic bags in the ban. For more information on concerns heard regarding compostable plastics restrictions, please refer to **Section 3.1.4**.

Two Indigenous communities, eight local governments (municipal and regional), and two NGOs noted they felt the restrictions did not go far enough in addressing issues related to single-use plastic checkout bags. Themes identified by these groups included:

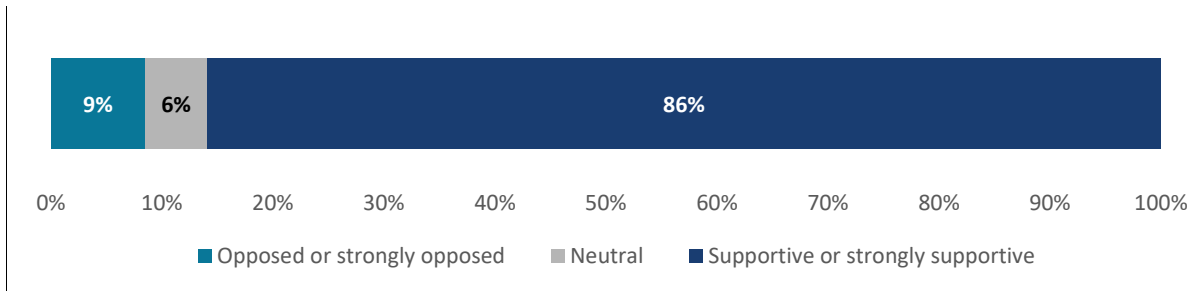
- Concern that allowing businesses to keep the fees charged for paper and reusable bags will create an incentive for businesses to continue selling these items to consumers, and will be counterproductive (many of these submissions recommended that a portion or all the fees be contributed to a provincial fund for environmental stewardship) (58%, n=7);
- Recommendations that regulations on reusable bags be made more stringent, with EPR requirements and/or requirements that such bags be made of renewable, non-plastic materials (50%, n=6);

- Concern that the ban on plastic checkout bags left many other types of single-use plastic film packaging, such as bags for produce and meat, unaddressed (25%, n=3);
- Concern that regulating only checkout bags left open loopholes for other uses of single-use plastic bags, such as those used in prepared food delivery (e.g., through online food ordering platforms) (17%, n=2); and
- Recommendations for improvements on the definition of a paper bag (i.e., not allowing laminated paper or polyester cords) and higher requirements for recycled content (17%, n=2).

3.1.2 Restrictions on Plastic and Single-Use Utensils

Most respondents to the public survey (86%) were in favour of the proposed restrictions on single-use foodservice accessories (by-request only, with self-service stations permitted). About one in ten respondents (9%) were opposed to this proposed restriction.

Figure 3.2: Public Support for Restrictions on Single-Use Foodservice Accessories



Source: Plastic and Single-Use Waste Reduction Public Survey
Valid n=1,936.

Most Indigenous communities, local governments and NGOs were in favour of the restriction on single-use foodservice accessories. Nearly all written submissions from these groups that included comments on this issue (n=27) were supportive of this change. Although, a few municipalities highlighted the need to ensure that access is protected for those with disabilities or other needs that require single-use foodservice accessories, such as flexible straws.

The two submissions from health authorities both highlighted the need to use disposable items in certain settings for infection control and encouraged the government to ensure that exemptions for these uses are made clear in any legislation moving forward.

Among the 27 submissions that were supportive of this change, some (30%, n=8) suggested these restrictions do not go far enough to reduce waste from foodservice accessories. Additional recommended changes included:

- Creating a requirement to offer only reusable service ware for dine-in service, and offering single-use disposable items only for take-away orders;
- Ensuring that by-request requirements apply to food delivery orders (e.g., food ordered via online platforms); and,
- Requiring fees be charged for single-use accessories to further disincentivize their use.



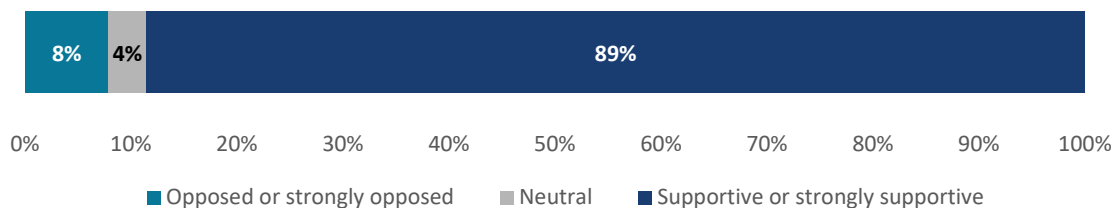
Among business and industry submissions, those that commented on this proposed restriction (n=13) were in the foodservice industry or from other impacted industries such as foodservice packaging manufacturers, and they were also opposed to the restrictions, and were opposed to the restrictions or recommended major changes. Concerns raised in these submissions focused on the cost implications of the change to a by-request model and a ban on plastic foodservice accessories, such as the costs of alternative products and reduced efficiency in transactions (n=7). Six of the business and industry associations emphasized that the foodservice and hospitality industries remain fragile after the COVID-19 pandemic and associated shutdowns, and these potential additional costs cannot be borne by small businesses as they continue to recover.

Three submissions from businesses and industry associations indicated a preference for an “opt-in” model, where customers indicate that they want utensils generally, rather than a “by-request” model where customers are not provided with any specific item unless they request them individually. Other suggestions were to ban plastic foodservice accessories but make no regulations regarding foodservice accessories made from fiber-based materials (e.g., bamboo or wood) (n=2).

3.1.3 Restrictions on Foodservice Packaging Made from Problematic Plastics

The proposed bans on foodservice packaging made from specific, problematic plastics (polystyrene foam, polyvinyl chloride or PVC, compostable plastics, and oxo-degradable plastics) had high levels of support, with nearly 90% of public survey respondents supporting this measure.

Figure 3.3: Public Support for Bans on Foodservice Packaging Made from Problematic Plastics



Source: Plastic and Single-Use Waste Reduction Public Survey
Valid n=1,926.

All submissions from local governments and NGOs, and one from an Indigenous community, were supportive of the proposal to ban single-use food packaging items made from problematic plastics. Local government submissions frequently noted these items caused issues for their waste management practices locally (e.g., sorting, recycling). A few local government submissions (n=3) and one Indigenous group also noted that while municipalities may enact local restrictions on plastic waste items, it is easy for these items to migrate from other areas where there are no restrictions and continue to complicate waste management approaches in local jurisdictions. Provincewide restrictions on these items are expected to reduce these challenges. In addition, seven submissions (local governments n=6, NGO n=1) recommended that future action should attempt to ban all items made from these problematic plastics, not just single-use foodservice packaging; one submission from an Indigenous group similarly advised restrictions on all items made from problematic plastics, although did not specifically advocate for a ban.

Twenty-two submissions from industry and associations commented on the proposed changes regarding food packaging made from problematic plastics. These submissions came from a wide variety of industry

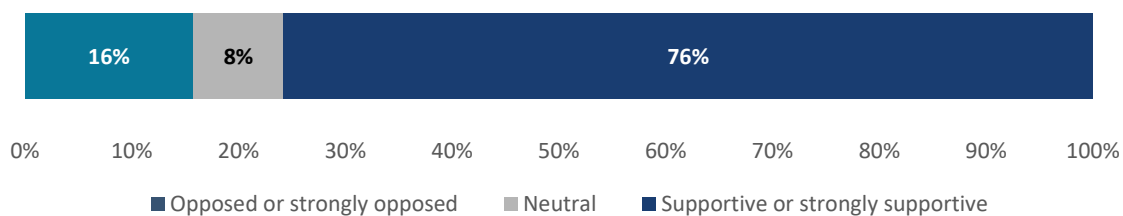
types, including retail, foodservice businesses, plastic products manufacturers and recyclers. Many of these submissions (n=13) objected to the classification of “compostable” plastics as problematic (discussed in greater detail in **Section 3.1.4** below). Most of these submissions did not, however, object to banning single-use food packaging made from polystyrene foam and/or PVC.

A further 11 submissions from businesses and industry associations, largely from retail and hospitality or foodservice industries, were either opposed to the proposed restrictions on these products (n=4) or recommended extended implementation times (e.g., one to two years) (n=7) to make the transition easier for businesses. Some recommended additional exemptions such as not charging for paper bags in takeout and drive-thru transactions, and limiting by-request accessory requirements to include only petroleum-based plastics. There were also some submissions from industry and business submissions (n=10) who were concerned by restrictions on various types of plastic products, indicating that banning them rather than investing in innovation and infrastructure to improve recycling methods could be counterproductive and may affect the transition to a circular economy in British Columbia.

3.1.4 Restrictions on Compostable Plastics

Most respondents to the public survey (76%) supported restrictions on single-use items and food service packaging made from compostable plastics.

Figure 3.4: Public Support for Bans on Single-Use Foodservice Items Made from Compostable Plastics in B.C.



Source: Plastic and Single-Use Waste Reduction Public Survey
Valid n=1,882.

While the public was generally supportive of the proposed restrictions on compostable plastics, written submissions from local governments, NGOs and industry were divided. All local governments and NGOs commented positively on the proposed restrictions on compostable plastics, while nearly all submissions from businesses and industry associations that commented on the topic were opposed to the restrictions.

Submissions from local governments regarding compostable plastics (n=18) supported the proposal to restrict compostable plastics. Many of these submissions (n=10) noted their own cities or towns had experienced challenges with these materials, due to contamination of the recycling stream and/or not being able to be composted at local facilities. All NGOs that provided written submissions (n=3) also supported this restriction on compostable plastics.

Many of the submissions from business and industry associations felt it was inappropriate to term compostable plastics as “problematic” (n=20). Instead, they suggested that greater investment in composting facilities and greater adoption of these plastics as substitutes for more conventional plastics, was the appropriate path forward for plastic waste reduction in the province. Over half (n=13) of these



submissions came from businesses and industry associations involved in manufacturing, distributing, and/or reclaiming (e.g., recycling or composting) plastics alternatives, including compostable plastics.

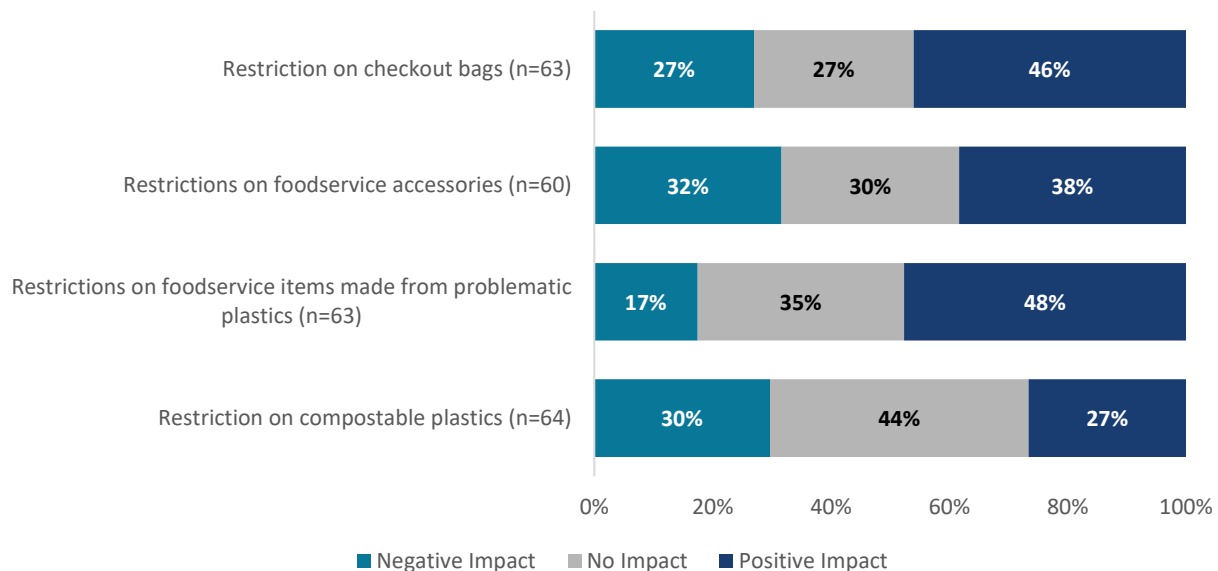
A total of 34 submissions from businesses and industry associations commented on the proposed near total ban on compostable plastic single-use items in B.C.; of these, only two supported the change. Most (n=32) recommended that compostable plastic single-use items continue to be allowed. Comments related to this view identified that compostable plastics are a more environmentally friendly option compared to petroleum-derived plastics. Rather than banning single-use items and packaging made from compostable plastics, the Province should invest more in recycling and composting facilities to ensure these items can be composted uniformly across the province.

There was also discussion among many business submissions (n=18) and two local government submissions regarding certification of compostable plastics. Nearly all businesses that commented on this topic (n=17) advocated for making exceptions for “certified” compostable plastics, arguing that certification processes ensure that any plastics marketed as “compostable” are, in fact, compostable. However, two local governments and one business submission noted there are currently no standards for “certified compostable” plastics that have been adopted by federal or provincial government agencies. It was also noted that there are currently multiple bodies that certify plastics as compostable, with inconsistent standards and requirements, not fully transparent with the public, and not always reflective of real-life composting conditions at all municipal composting facilities in the province.

3.2 Potential Impacts of Proposed Changes

Respondents to the business survey were asked to rate the impacts they anticipated from the four proposed restrictions. For each of the four restrictions, majorities of respondents expected to see either positive impacts or no impacts at all. A restriction on checkout bags (46% anticipated a positive impact) and restrictions on foodservice items made from problematic plastic (48% anticipated a positive impact) were anticipated to most likely to have a positive effect.

Figure 3.5: Impacts of Proposed Changes on Businesses in B.C.



Source: Plastic and Single-Use Waste Reduction Business Survey.

Valid n varies by survey item, please refer to figure for details.

Many businesses (please refer to **Table 3.1** for exact numbers for each proposal) anticipated that the proposed restrictions would result in an overall increase in customer satisfaction and lower costs to their business. However, there was also a considerable number of business respondents that identified potential challenges with finding acceptable plastic alternatives and managing B.C. regulations that may be different from the rest of Canada.

Table 3.1: Anticipated Types of Impacts of Proposed Changes on Businesses in B.C.

Proposal	Top Two Positive Impacts	Top Two Negative Impacts
Restriction on checkout bags (valid n=50)	1 = Increase in customer satisfaction (40%, n=20) 2 = Lower costs to business (30%, n=15)	1 = Decrease in customer satisfaction (30%, n=15) 2 = Higher costs to business (28%, n=14)
Restriction on single-use foodservice accessories (valid n=49)	1 = Increase in customer satisfaction (37%, n=18) 2 = Lower costs to business (22%, n=11)	1 = Challenges in identifying and/or sourcing alternatives (35%, n=17) 2 = Challenges from B.C. regulations differing from other jurisdictions (31%, n=15)
Restrictions on foodservice packaging made from problematic plastics (valid n=45)	1 = Increase in customer satisfaction (49%, n=22) 2 = Increase in volume of sales (22%, n=10)	1 = Challenges from B.C. regulations differing from other jurisdictions (29%, n=13) 2 = Challenges in identifying and/or sourcing alternatives (27%, n=12) 2 = Higher costs to business (27%, n=12)
Restriction on compostable plastics (valid n=39)	1 = Increase in customer satisfaction (31%, n=12) 2 = Increase in volume of sales (10%, n=4) 2 = Lower costs to business (10%, n=4)	1 = Decrease in customer satisfaction (46%, n=18) 1 = Challenges in identifying and/or sourcing alternatives (46%, n=18) 2 = Challenges from B.C. regulations differing from other jurisdictions (44%, n=17)

Source: Plastic and Single-Use Waste Reduction Business Survey.
Valid n varies by survey item, please refer to table for details.

Business survey respondents were also able to identify other expected outcomes from the proposed regulation in open comment boxes. Only a small number of respondents (16 out of 183 comments), across all four areas of proposed restrictions, identified unique or novel issues not already listed in the survey as possible expected outcomes. Themes heard in these responses included:

- No expected impacts, positive or negative, from the proposed changes (n=10);
- Reduced waste (n=5);
- Stranding of current plastic stock (n=2); and,
- Increased labour costs due to additional work to manage or wash non-disposable items (n=1).⁶

⁶ Comments were coded with up to three themes each; therefore, code counts may add up to more than the total number of unique comments identified.

In the written submissions a variety of expected outcomes from the proposed restrictions were identified. Indigenous communities, local governments and NGOs largely anticipated positive outcomes, while businesses and industry tended to identify negative financial or economic impacts.

Nearly all written submissions from businesses and industry associations (38 of 41 submissions) identified negative outcome(s) associated with at least one of the proposed changes. Many of the challenges identified related to reduced profitability and/or increased costs for businesses; the most common themes are below.

- Reduced customer satisfaction due to the changes (e.g., needing to bring their own bag or pay for one at the store, lower quality of alternatives to single-use plastics, etc.) (n=10);
- Challenges and confusion stemming from B.C.'s regulations being more stringent, and out-of-step compared to federal and/or other provincial regulations on single-use plastics (n=10);
- Concerns these restrictions and bans would reduce innovation in the recycling sector and potentially affect B.C.'s transition to a circular economy (n=8);
- Increased costs to businesses to source and stock alternatives to single-use plastic items, and/or to offer non-disposable options such as ceramic dining dishes for eat-in orders (n=8);
- Concerns that alternative materials may have larger carbon footprints when a life-cycle analysis is taken into consideration (n=6); and,
- Health and safety concerns related to use of non-plastic alternatives (n=4).

All local governments and NGOs (n=22), and one Indigenous group, identified positive outcomes that are expected to result from the proposed restrictions. These included:

- Reduced contamination of recycling streams and fewer challenges in waste management related to problematic plastics (n=16);
- Greater harmonization among regions and municipalities across B.C. in terms of bans or restrictions on challenging waste products (n=12); and,
- Reduced waste (n=9).

In addition to the positive outcomes identified, many local governments (n=13) and one Indigenous group also raised concerns about the impacts of the proposed changes, most commonly how municipalities would enforce the regulations. This is discussed in further detail in **Section 3.5**.

The submissions from Indigenous communities that commented on expected impacts from these changes were largely positive and believed that they would lead to reduced waste in their communities. Two submissions recommended additional funding and supports be put in place to help people find and afford alternatives to plastic packaging, as well as recycle items effectively. One Indigenous community submission noted that they expected the new restrictions to have negative financial impacts on their retail store.

Two written submissions classified as “local government” came from regional health authorities. These submissions highlighted the potential impacts of the regulations on use of single-use items in hospital and other health-care settings, where single-use items are needed for infection control and sanitation purposes.



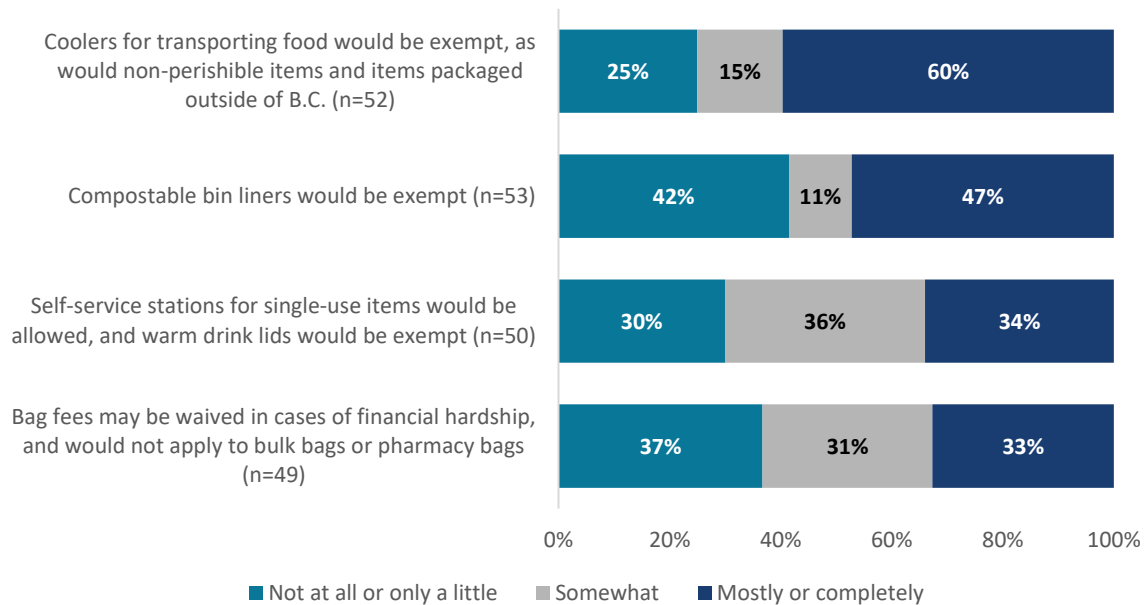
3.3 Considerations for Exemptions

Exemptions for accessibility needs were a high priority among many participants in this engagement, as well as general concerns about equity in the changes.

Among respondents to the open public survey, the most common response to the question regarding potential additional exemptions was “no suggestions for additional exemptions” (17% of comments). Where comments on exemptions were made, equity concerns were the most prevalent. Seven per cent of those commenting on exemptions identified single-use plastic straws as needing to remain available for those with accessibility concerns, and a further 6% of comments made general appeals to consider equitable impacts on vulnerable groups when considering these changes (e.g., impacts on low-income households, persons with disabilities, seniors, and others) and make appropriate exemptions to avoid burdening these groups.

For the most part, business survey respondents believed the exemptions proposed are insufficient to address their concerns about the changes. Although, most respondents to the business survey (60%) considered the exemption allowing polystyrene foam coolers for transporting food and non-perishable items and items packaged outside of B.C. to be sufficient.

Figure 3.6: Extent to which Exemptions Address Businesses’ Concerns about Proposed Restrictions



Source: Plastic and Single-Use Waste Reduction Business Survey.
Valid n varies by survey item, please refer to figure for details.

Submissions from several restaurant and foodservice oriented organizations (n=7) proposed a variety of exemptions related to foodservice packaging, ranging from item-specific (e.g., an exemption for all beverage cups) to sector-based (e.g., an exemption on all bags and single-use foodservice accessories and packaging used for takeout orders).

Finally, two submissions from local health authorities identified the need for single-use items in hospital and health-care settings to support infection control measures. These submissions encouraged the Province to continue to consult with stakeholders in the sector to identify various exemptions and ensure they are included in any future legislation on this topic.

As noted previously, some respondents to the public survey indicated concern that the proposed restrictions and regulations could adversely impact already vulnerable groups in B.C.; respondents recommended exemptions be built into the requirements to minimize these issues. Considerations included making plastic straws available for people with accessibility needs, waiving bag fees in cases of financial hardship, and making single-use foodservice wares (e.g., takeout containers) available to people who are unhoused.

As discussed in earlier sections, many business and industry association submissions voiced opposition to some or all the proposed changes regarding single-use and plastic waste, and/or suggested a range of exemptions to minimize the impact of the proposed changes on industry. Some submissions (n=8), largely from hospitality businesses and plastics manufacturers, advocated for a significantly longer implementation timeline than the six months suggested in the intentions paper. While not all provided specific timelines, those that did recommended one to two years of lead time. A few submissions noted that the restaurant and hospitality industries are still recovering from the effects of the COVID-19 pandemic, and additional costs should not be placed upon the industry at this time.

3.4 Communication and Education

Businesses responding to the online survey were asked what supports would be helpful to them in navigating the transitions associated with the proposed changes for single-use and plastic waste. The most common themes identified among responses were:

- Public communication to inform consumers of the required changes and how it will impact their shopping (78%);
- Training, advice and informational support to businesses on how to encourage more reuse among customers (57%);
- Information on how regulations from different levels of government fit together (43%); and,
- Food handling policies that support the adoption of reusable and/or container sharing programs (38%).

3.5 Compliance and Enforcement

Of the 19 local governments that provided written submissions, most (n=13) noted that empowering municipalities to enforce provincial regulations would create challenges for local communities. All of these 13 submissions noted that local capacity to take on this enforcement work was extremely limited due to a lack of resources (i.e., funding, staff availability). These submissions recommended further provincial government support be provided; recommended supports ranged from informational resources and help for local communities, to increased funding, to full provincial responsibility for enforcement and monitoring.

Two submissions from Indigenous communities also identified some challenges with compliance and enforcement of these changes. One group noted that, due to their community's unique geography, the large majority of plastic waste in their community originates from outside of the province and therefore



they anticipate challenges in managing this waste and foresee relatively little benefit from many of these changes. Another group noted that it will be important to provide supports to their community members to adapt to these changes, such as making reusable options more accessible and increasing the adoption of blue box recycling programs.

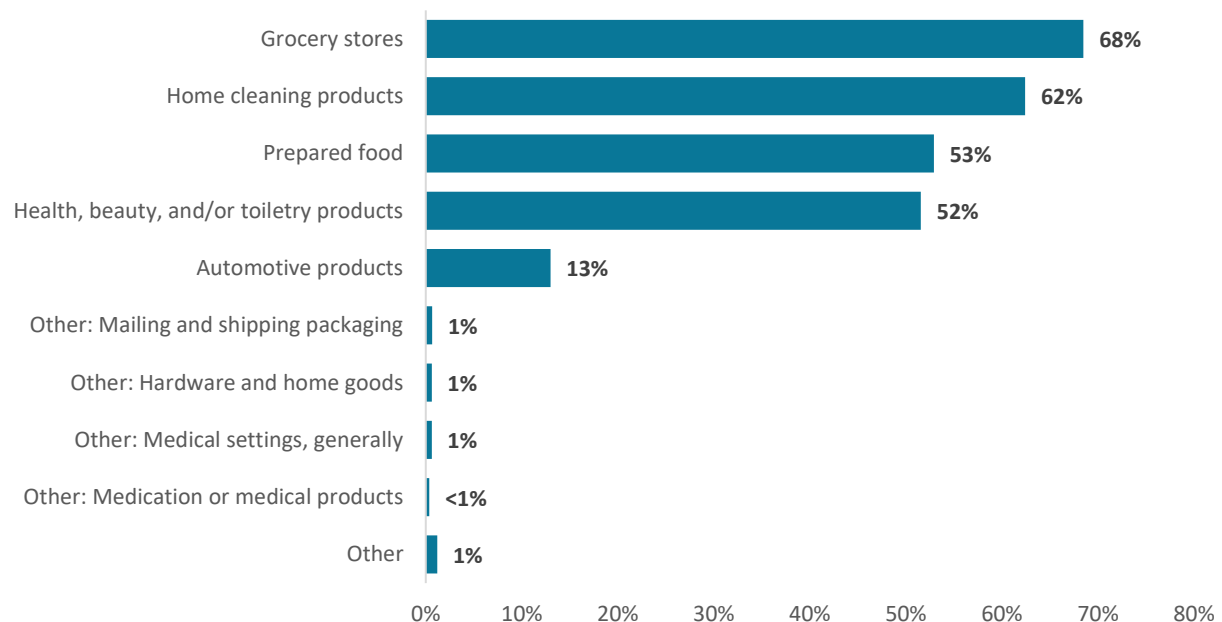
Several municipalities (n=5) also noted a need for greater clarity regarding the powers of municipalities to enforce these new regulations and impose penalties for infractions. In particular, the issue of violators being “double penalized” under both municipal and provincial restrictions for a single infraction was identified as a potential issue, and an area where municipalities need greater guidance.

3.6 Future Steps to a Circular Economy

3.6.1 Reuse and Refill Systems

Most respondents to the public survey indicated they saw greater opportunity for reuse and refill systems, particularly at grocery stores and for home cleaning products. **Figure 3.7** below illustrates respondents’ answers to this question.

Figure 3.7: Areas where Public Survey Respondents See Opportunity for Greater Use of Reuse & Refill Systems



Source: Plastic and Single-Use Waste Reduction Public Survey.
Valid n=1,945.

Responses from businesses were slightly less positive about opportunities for greater reuse and refill systems, with most respondents seeing use of these opportunities at grocery stores and for prepared foods.

Figure 3.8: Areas where Business Survey Respondents See Opportunity for Greater Reuse & Refill Systems



Source: Plastic and Single-Use Waste Reduction Business Survey.
Valid n=67.

Respondents to both surveys were also asked what the biggest barriers are to increasing their own adoption of reuse and refill systems. Among members of the public, the top barriers were concerns around sanitation (42%), not knowing what's available (37%), inconvenience (37%), and costs (34%). For businesses, the top barriers identified were costs (43%), concerns around sanitation (33%), access (31%), and inconvenience (30%). Notably, 34% of business respondents reported no barriers or were already fully offering reuse and refill systems at their stores.

3.6.2 Recycled Content Standards

Businesses were asked what would influence their use of packaging or products made from recycled content. The most reported concerns or determining factors around this were:

- Availability (54%);
- Cost (51%);
- Local supply (43%);
- Quality (36%); and,
- Standards and labelling (36%).

3.6.3 Reuse and Recycling

Differences in opinion regarding the relative priority of reusing versus recycling in a waste reduction system were evident in written submissions from the variety of interested parties that participated in this engagement.

Some submissions from industry and associations (n=10), particularly those from recyclers and plastics manufacturers, recommended the provincial government reconsider bans on specific types of plastics identified as problematic in the intentions paper, and invest in improving recycling methods in B.C. instead. These submissions suggested that increased recovery and recycling of plastic waste, as well as

increased innovation in the field of plastic recovery to improve the quality of recycled materials (currently not yet developed), would support B.C.'s efforts to move to a circular economy.

Similar comments were made regarding compostable plastics, with 32 submissions stating that single-use items and foodservice packaging made from compostable plastics should not be banned. Many of these (n=20) suggested that the response to issues created by compostable plastics should not be to ban them, but for greater investment to be made in composting and recycling facilities so they can be effectively recovered and recycled or disposed.

In contrast, 11 local government submissions and two non-governmental organizations (NGO) submissions noted that promoting systems of reuse and refill are preferable to investing in recycling infrastructure. Comments from these submissions stated that recycling has not been an effective solution to single-use waste. Many communities continue to struggle to effectively recover single-use plastics, and even when plastics are recovered from consumers, they may not be recycled effectively due to contamination of the recycling stream. Further, and as also noted by several (n=3) industry associations, the current quality and pricing of recycled plastics is generally not competitive with that of virgin materials, and therefore demand for these materials remains low.

Similarly, seven submissions (all from local governments and NGOs) noted that in the long term, extended producer responsibility programs and recycling cannot be the only or primary tool used to reduce waste.

Additional Measures Under Consideration by Local Governments

Twelve of the 19 local governments that provided submissions identified other materials, which they were considering creating restrictions in their local communities. The most common materials that were identified as being problematic in communities, and under consideration for further restrictions or bans, were:

- Disposable beverage cups (n=8);
- Construction and ICI waste (n=6);
- Plastic film and other flexible plastic packaging (n=4); and,
- Fishing and aquaculture products such as nets (n=2).

Three submissions from Indigenous groups also identified other materials that they would like to see addressed in future restrictions. These included fishing gear (n=1), other flexible plastic film (n=1), and other (non-single-use) items made from problematic plastics (n=1).

3.7 Closing

The ministry would like to thank all respondents for their feedback. All comments will be considered in the development of the waste prevention regulation and when pursuing other policy approaches.



APPENDIX A: PUBLIC SURVEY

Preventing Plastic and Single-Use Waste in B.C.: Public Engagement Public Survey Questionnaire

Page 1: Engagement Introduction

As part of the provincial CleanBC strategy, the Government of British Columbia is looking at ways to reduce waste in B.C., especially waste from single-use and plastic items. Several approaches are being considered in support of this strategy including a new regulation that would limit or ban the use of certain single-use items.

Please review the [Intentions Paper](#) for details on the proposed regulation and actions prior to sharing your feedback in this survey.

This survey will take around 15 minutes to complete.

Collection Notice: Your personal information will be collected for the purposes of informing CleanBC's approach to preventing plastic and single-use waste. If you have any questions about the collection of this personal information, please contact: Director, Citizen Engagement, citizenengagement@gov.bc.ca. This information is being collected by the Ministry of Citizens' Services on behalf of the Ministry of Environment and Climate Change Strategy under the authority of section 26(c) and 26(e) of the Freedom of Information and Protection of Privacy Act ("FOIPPA").

Please do not include any personally identifiable information about yourself or others in your response.

Public Survey

1. Please select your region from the options below.
 - Interior (East Kootenay, Kootenay Boundary, Okanagan, Thompson Cariboo Shuswap)
 - Fraser (Fraser East, Fraser North, Fraser South)
 - Vancouver Coastal (Richmond, Vancouver, North Shore / Coast Garibaldi)
 - Vancouver Island (South Vancouver Island, Central Vancouver Island, North Vancouver Island, Gulf Islands)
 - Northern (Northwest, Northern Interior, Northeast)
 - Outside of B.C.
 - Prefer not to answer

2. What is your age?
 - Under 19 years
 - 19 to 29 years
 - 30 to 49 years
 - 50 to 64 years
 - 65 to 69 years
 - 70 years or older
 - Prefer not to answer



3. Which gender do you identify with?
- Male
 - Female
 - Gender fluid, non-binary, and/or Two-Spirit
 - Prefer not to answer
4. Do you live in a municipality that already has restrictions on single-use items in place? (e.g., a ban on plastic checkout bags)?
- Yes
 - No
 - Don't know
5. Do you identify as Indigenous?
- Yes
 - No
 - Prefer not to answer
6. [Present only if answered "Yes" to 5 above] Which of the following do you identify with? Please select all that apply.
- First Nation
 - Métis
 - Inuit
 - Other Indigenous
 - Prefer not to answer
7. How concerned are you about the amount of single-use items being used and thrown away in B.C.?
- 1 – Not at all concerned
 - 2 – Slightly concerned
 - 3 – Moderately concerned
 - 4 – Highly concerned
 - 99 – Not sure / Prefer not to answer
8. Checkout Bags: British Columbians use an estimated 576 million single-use bags a year. Plastic checkout bags will be banned, and under the proposed regulation businesses would be required to charge customers a 25-cent fee on single-use paper bags to discourage their use and limit the associated environmental impacts.

Please rate your support for this provincial restriction.

- 1 – Completely opposed
- 2 – Mostly opposed
- 3 – Neutral
- 4 – Mostly supportive
- 5 – Completely supportive
- 99 – Not sure / Prefer not to answer

9. Using reusable bags would have the greatest impact on reducing waste and pollution from checkout bags. However, this approach is effective only if the reusable bags that replace single-use bags are durable. Under the proposed regulation, reusable bags offered by retailers would have to be capable of at least 100 uses and washes. The minimum fee for this type of bag would be \$2.00.

Do you support or oppose this minimum quality standard for reusable bags? Please use the rating scale below to indicate.

- 1 – Completely opposed
- 2 – Mostly opposed
- 3 – Neutral
- 4 – Mostly supportive
- 5 – Completely supportive
- 99 – Not sure / Prefer not to answer

10. Food Service Accessories: Under the proposed regulation, single-use foodservice accessories (e.g., disposable utensils, condiment packets) would no longer be automatically included in orders but would still be available on a by-request basis (i.e., customers can be provided with items when they ask) at stores and restaurants. This will reduce the number of single-use items that are given out unnecessarily and thrown away unused. The proposed regulation would also apply to non-plastic items, such as those made from wood or paper. Self-service stations with these items would still be allowed under this restriction.

Do you support or oppose this restriction? Please use the rating scale below to indicate.

- 1 – Completely opposed
- 2 – Mostly opposed
- 3 – Neutral
- 4 – Mostly supportive
- 5 – Completely supportive
- 99 – Not sure / Prefer not to answer

11. Plastic Food Packaging: Under the proposed regulation, certain types of food packaging (e.g., bowls, plates, cups, trays, containers, and cartons) made from problematic plastics that aren't effectively recycled in B.C. would be banned.

The provincial and federal governments have identified problematic plastics as plastic food packaging made from polystyrene foam (i.e., Styrofoam), polyvinyl chloride (PVC) (e.g., cling wrap) and oxo-degradable plastics. The proposed provincial regulation would prohibit the sale and distribution of polystyrene foam and PVC food packaging (including trays, cartons, and deli containers) and all oxo-degradable plastics.

Do you support or oppose this restriction? Please use the rating scale below to indicate.

- 1 – Completely opposed
- 2 – Mostly opposed
- 3 – Neutral
- 4 – Mostly supportive
- 5 – Completely supportive
- 99 – Not sure / Prefer not to answer

12. Compostable Plastics: The Province has heard significant concerns and challenges with managing compostable plastic foodservice ware (e.g., bowls, plates, cups, trays, containers, and cartons made from compostable plastics). The proposed regulation would ban compostable plastic foodservice ware because it is hard to compost, is not able to be recycled in B.C., and often ends up in a landfill.

Do you support or oppose this restriction? Please use the rating scale below to indicate.

- 1 – Completely opposed
- 2 – Mostly opposed
- 3 – Neutral
- 4 – Mostly supportive
- 5 – Completely supportive
- 99 – Not sure / Prefer not to answer

13. Exemptions: The proposed regulation includes several exemptions to promote health, well-being, and equal access for British Columbians. These include exemptions for take-a-bag, leave-a-bag programs; non-checkout bags (e.g., bags for bulk items like produce, prescription drugs and medical devices); hot beverage lids that minimize the risk of customers being scalded; and polystyrene foam coolers used to transport seafood or other perishable items. Are there any other exemptions the Province should consider as part of these restrictions?

<open-ended text box, max 250 characters>

- No comment

14. Future Opportunities: The proposed regulation is a provincewide step to move away from single-use items to reusables, and to prevent waste and pollution from single-use plastic items. There are also other alternative business models (e.g., reuse and refill) that reduce the use of single-use items.

Where do you see opportunities for greater reuse and/or refill? Please select your top three choices.

- Prepared food (e.g., restaurant/food service)
- Grocery stores
- Health/beauty/toiletries
- Home cleaning products
- Automotive products
- Other – please specify

15. What barriers, if any, are there to your use of reuse/refill for products you buy? Please select your top three choices.

- Don't know what's available
- Costs
- Concerns around sanitation
- Limited support among customers
- Inconvenience
- Not interested
- Other - please specify



16. Future Opportunities: Recycled content standards can also be used to reduce the demand for new material and increase the use of existing materials. For example, in some places there are requirements for items such as beverage containers and trash bags to be made from a minimum percentage of recycled material. Do you support or oppose a minimum quantity of recycled material being used to make certain products (e.g., packaging, electronic goods)?

- 1 – Completely opposed
- 2 – Mostly opposed
- 3 – Neutral
- 4 – Mostly supportive
- 5 – Completely supportive
- 99 – Not sure / Prefer not to answer

17. Final Comments: Do you have any final comments you would like to share about the proposed changes to reduce plastic and single-use item waste in B.C.?

<open-ended text box, max 500 characters>

- No comment

Thank you for taking the time to provide your feedback. Feedback will be collected and summarized in a *What We Heard* report, due to be published summer 2022.



APPENDIX B: BUSINESS SURVEY

Preventing Plastic and Single-Use Waste in B.C.: Public Engagement Business Survey Questionnaire

Page 1: Survey Introduction

As part of the provincial CleanBC strategy, the Government of British Columbia is looking at ways to reduce waste in B.C., especially waste from single-use and plastic items. Several approaches are being considered in support of this strategy including a new regulation that would limit or ban the use of certain single-use items.

Please review the [Intentions Paper](#) for details on the proposed regulation and actions prior to sharing your feedback in this survey.

Note: Local governments, organizations, industry, and businesses wanting to provide written comments are invited to provide a written submission.

This survey will take around 15 minutes to complete.

Collection Notice: Your personal information will be collected for the purposes of informing CleanBC's approach to preventing plastic and single-use waste. If you have any questions about the collection of this personal information, please contact: Director, Citizen Engagement, citizenengagement@gov.bc.ca. This information is being collected by the Ministry of Citizens' Services on behalf of the Ministry of Environment and Climate Change Strategy under the authority of section 26(c) and 26(e) of the Freedom of Information and Protection of Privacy Act ("FOIPPA").

Please do not include any personally identifiable information about yourself or others in your response.

Business Survey

1. Please select your region from the options below.
 - Interior (East Kootenay, Kootenay Boundary, Okanagan, Thompson Cariboo Shuswap)
 - Fraser (Fraser East, Fraser North, Fraser South)
 - Vancouver Coastal (Richmond, Vancouver, North Shore / Coast Garibaldi)
 - Vancouver Island (South Vancouver Island, Central Vancouver Island, North Vancouver Island, Gulf Islands)
 - Northern (Northwest, Northern Interior, Northeast)
 - Multiple locations across B.C.
 - Outside of B.C.
 - Prefer not to answer

2. How many people does your business employ as permanent staff (i.e., not including seasonal hires)?
 - None
 - 1 to 49 employees
 - 50 to 99 employees
 - 100 to 499 employees
 - 500+ employees

3. Is your business a franchise?
 - Yes
 - No
 - Prefer not to answer

4. Which of the following best describes your business or association's *main area* of operation? Please select one.
 - Plastics manufacturing, wholesale, and/or distribution
 - Alternatives (i.e., non-plastic packaging/product) manufacturing, wholesale, and/or distribution
 - Plastics recycling
 - Grocery retail
 - Other retail
 - Foodservice (e.g., café, restaurant, bakery, etc.)
 - Food processor/packer
 - Other, please describe: _____
 - Prefer not to answer

5. [Ask only if responded "Foodservice" to Q4 above] Within foodservice, which of the following best describes your business' *main area* of operation?
 - Pub or restaurant
 - Café or bakery
 - Food truck or takeaway
 - Hotel or accommodation
 - Other

6. Is your business in a municipality that already has restrictions on single-use items in place (e.g., a ban on plastic checkout bags)?
 - Yes
 - No
 - Don't know

7. As a business/association, how concerned are you about the amount of single-use items being used and thrown away in B.C.?
 - 1 – Not at all concerned
 - 2 – Slightly concerned
 - 3 – Moderately concerned
 - 4 – Highly concerned
 - 99 – Not sure / Prefer not to answer

8. Fees on Checkout Bags: Switching from single-use to reusable bags would have the greatest impact on waste and pollution from checkout bags, but only if single-use bags are replaced with durable, reusable bags. The federal government plans to ban plastic bags (including compostable plastic bags). In addition, the proposed provincial regulation would require businesses to charge customers a 25-cent fee on single-use paper bags to discourage their use, and a minimum of \$2.00 for sale of new reusable bags that are capable of at least 100 uses and washes. The fees for both paper and reusable bags would be kept by the retailer/business.

Please rate what kind of impact you expect this restriction would have on your business.

- 1 – Major negative impact
- 2 – Some negative impact
- 3 – No impact, positive or negative
- 4 – Some positive impact
- 5 – Major positive impact
- Not sure / Prefer not to answer

9. [Skip if answered 3 to Q8 above] What impacts do you expect to see on your business as a result of a plastic bag ban with fees on single-use paper bags? Please select your top five impacts.

- Increase in customer satisfaction (e.g., better environmental reputation)
- Decrease in customer satisfaction (e.g., forgetting reusable bags, fees for single-use bags)
- Increase in volume of sales
- Decrease in volume of sales
- Lower costs to business (e.g., retention of fees to cover costs, customers bringing or using their own reusable bags more frequently)
- Higher costs to business (e.g., to provide non-disposable options, cost of bags, increased transaction time)
- Challenges in identifying/sourcing alternatives (e.g., paper bags, reusable bags)
- Challenges in managing requirements of B.C. regulations that differ from other jurisdictions
- Other, please specify: _____ <open-ended text box, maximum 250 characters>
- No comment / Prefer not to answer

10. Foodservice Accessories: Under the proposed regulation, single-use foodservice accessories (e.g., disposable utensils, condiment packets) could only be supplied by-request (i.e., customers can only be provided with items when they ask). This would reduce the number of single-use items that are given out unnecessarily, while ensuring individuals who need them (e.g., those with disabilities or medical conditions) still have access. This restriction would also apply to non-plastic items, such as those made from wood or paper. Self-service stations with these items would still be allowed.

Please rate what kind of impact you expect this regulation would have on your business.

- 1 – Major negative impact
- 2 – Some negative impact
- 3 – No impact, positive or negative
- 4 – Some positive impact
- 5 – Major positive impact
- Not sure / Prefer not to answer

11. [Skip if answered 3 to Q10 above] What impacts do you expect to see on your business as a result of a by-request framework for foodservice accessories? Please select your top five impacts.
- Increase in customer satisfaction (e.g., better environmental reputation)
 - Decrease in customer satisfaction (e.g., forgetting to request items when needed)
 - Increase in volume of sales
 - Decrease in volume of sales
 - Lower costs to business (e.g., reduced demand for foodservice accessories)
 - Higher costs to business (e.g., to provide non-disposable options, increased transaction time)
 - Challenges in identifying/sourcing alternatives (e.g., reusable items, refill systems for condiments)
 - Challenges in managing requirements of B.C. regulations that differ from other jurisdictions
 - Other, please specify: _____ <open-ended text box, maximum 250 characters>
 - No comment / Prefer not to answer
12. Plastic Food Packaging: Under the proposed regulation, certain types of food packaging (e.g., plates, cups, containers, trays, clamshells) made from problematic plastics that are hard to recycle in B.C. would be banned. The Province and the federal government have identified problematic plastics as plastic food packaging made from polystyrene foam (i.e., Styrofoam), polyvinyl chloride (PVC) (e.g., cling wrap) and oxo-degradable plastics.
- The proposed provincial regulation would prohibit the sale and distribution of polystyrene foam and PVC food packaging (including trays, cartons, and deli containers) and all oxo-degradable plastics. Businesses would still be able to provide plastic food packaging made from other types of plastics (e.g., PET) or other alternatives such as paper or reusable items.
- Please rate what kind of impact you expect this regulation would have on your business.
- 1 – Major negative impact
 - 2 – Some negative impact
 - 3 – No impact, positive or negative
 - 4 – Some positive impact
 - 5 – Major positive impact
 - Not sure / Prefer not to answer
13. [Skip if answered 3 to Q12 above] What impacts do you expect to see on your business as a result of bans on food packaging made from problematic plastics? Please select your top five impacts.
- Increase in customer satisfaction (e.g., better environmental reputation)
 - Decrease in customer satisfaction (e.g., finding alternative packaging less convenient or appealing)
 - Lower costs to business (e.g., increase in customers using their own reusable containers, lower costs for alternative containers)
 - Increase in volume of sales
 - Decrease in volume of sales
 - Higher costs to business (e.g., increased costs for alternatives, increased transaction time using customers' containers)
 - Challenges in identifying/sourcing alternatives (e.g., PET plastic or paper-based containers, reusable containers)
 - Challenges in managing requirements of B.C. regulations that differ from other jurisdictions
 - Other, please specify: _____ <open-ended text box, maximum 250 characters>
 - No comment / Prefer not to answer

14. Compostable Plastics: The Province has also identified compostable plastic foodservice ware (e.g., plates, cups, trays, containers, cartons made from compostable plastics) as a problematic plastic. Under the proposed regulation, compostable plastic foodservice ware packaging would be banned. This is because compostable plastic is hard to compost, is not able to be recycled in B.C., and often ends up in a landfill. However, compostable bin liners and pet waste bags would be exempt from the ban to facilitate food waste composting.

Please rate what kind of impact you expect this regulation would have on your business.

- 1 – Major negative impact
 - 2 – Some negative impact
 - 3 – No impact, positive or negative
 - 4 – Some positive impact
 - 5 – Major positive impact
 - Not sure / Prefer not to answer
15. [Skip if answered 3 to Q14 above] What impacts do you expect to see on your business as a result of this restriction on compostable plastic food packaging? Please select your top five impacts.
- Increase in customer satisfaction (e.g., better environmental reputation)
 - Decrease in customer satisfaction (e.g., perceived poorer environmental practices, dislike of acceptable alternative packaging options)
 - Increase in volume of sales
 - Decrease in volume of sales
 - Lower costs to business (e.g., increased rate of customers bringing their own containers resulting in reduced costs to business to supply alternative containers)
 - Higher costs to business (e.g., higher cost of alternatives, increased transaction time to use customers' own containers)
 - Challenges in identifying/sourcing alternatives (e.g., PET plastic or paper-based containers, reusable containers)
 - Challenges in managing requirements of B.C. regulations that differ from other jurisdictions
 - Other, please specify: _____ <open-ended text box, maximum 250 characters>
 - No comment / Prefer not to answer



16. Exemptions: For some of the restrictions proposed on single-use and plastic items, exemptions have been identified to promote health, safety and equal access for British Columbians. To what extent do the following exemptions address any concerns you may have about these proposed policies?

Restriction	Exemption(s)	1 – Does not address my concerns at all	2 – Addresses my concerns only a little	3 – Somewhat addresses my concerns	4 – Mostly addresses my concerns	5 – Completely addresses my concerns	88 – Not applicable / I have no concerns	99 – Not sure / Prefer not to answer
a. Ban on plastic checkout bags	<ol style="list-style-type: none"> Paper and reusable bags must be offered for a fee; fee can be waived in cases of financial hardship. Does not apply to bulk bags (e.g., produce) or pharmacy bags. 							
b. Restriction on single-use foodservice accessories to by-request only	<ol style="list-style-type: none"> Self-service stations providing these items are allowed. Lids for warm beverages (e.g., coffee cup lids) exempt. 							
c. Ban on problematic plastics, including plastic food packaging made from polystyrene foam and all oxo-degradable packaging	<ol style="list-style-type: none"> Polystyrene foam acceptable for coolers used to transport perishable foods. Non-perishable items and items packaged outside of B.C. 							
d. Ban on compostable plastic food packaging	Compostable plastic bin liners, as permitted under the Organics Matter Recycling Regulation							

17. The proposed regulation is one of several steps the government is taking to address single-use and plastic waste and pollution and help move B.C. to a more circular economy. In a circular economy, we reduce waste by limiting the number of single-use items we use, stop using materials that are difficult to reuse or recycle, and keep what we do use working for us for longer.

Overall, how supportive is your business of the transition away from plastic and single-use items? Please use the rating scale below to indicate.

- 1 – Not at all supportive
- 2 – Only a little supportive
- 3 – Somewhat supportive
- 4 – Mostly supportive
- 5 – Completely supportive
- Not sure / Prefer not to answer

18. Implementation: What consumer education/information would be helpful for your business to implement the regulation?

- Communication to the public to inform consumers of required changes.
- Training, advice, and informational support on how to encourage more reuse (i.e., how to integrate reuse/refill into business operations, how to source durable reusable items).
- Food handling policies that support adoption of reusable and/or container sharing programs for takeaway dining.
- Information on how regulations from different levels of government fit together.
- Other, please describe: _____ [max 250 characters]
- I have no suggestions for education or informational supports
- Prefer not to answer

19. Future Opportunities: The proposed regulation is a provincewide step to move away from single-use items to reusables, and to prevent waste and pollution from single-use plastic items. There are also a variety of alternative business models (e.g., reuse and refill) that reduce the use of single-use items. Where do you see opportunities for greater use of reuse and/or refill approaches? Please select your top three.

- Food service/Restaurants
- Grocery stores
- Home cleaning products
- Beverages
- Automotive products
- Other, please describe: _____ [max 250 characters]
- I don't see any opportunities for greater use of reuse/refill systems
- Prefer not to answer



20. What barriers, if any, are there to your business offering reuse/refill options? Please select up to three.

- Don't know what's available
- Costs
- Access
- Inconvenience
- Concerns around sanitation
- Not interested
- Other, please describe: _____ [max 250 characters]
 - I don't see any barriers to my business offering these options / we already use these options
 - Prefer not to answer

21. Future Opportunities: Recycled content standards can also be used to reduce the demand for new material and increase the use of existing materials. For example, requiring that items such as paper bags and beverage containers are made from a minimum percentage of recycled material. What would influence your use of packaging or products made from recycled content? Please select up to three options.

- Customer satisfaction
- Local supply
- Cost
- Availability
- Quality
- Standards/labelling (i.e. ability to verify recycled content)
- Other – please specify

22. Final Comments: Do you have any final comments you would like to share about the proposed changes to reduce plastic and single-use item waste in B.C.?

- <open-ended text box, max 500 characters>
- No comment

Thank you for taking the time to provide your feedback. Please click "Submit" below to complete the survey.

APPENDIX C: WRITTEN SUBMISSION GUIDELINES

Preventing Plastic and Single-Use Waste in B.C.

Written Response Questions

Industry and Industry Associations

All written feedback received during the comment period will be considered in the development of the potential regulations and next steps.

Please consider the numbered questions to guide your response.

Feedback for each comment should include:

- The question being addressed, or section of the intentions paper to which the comment relates;
- The comment itself; and
- Any supporting information or rationale.

Written submissions should be no longer than five pages and be submitted in Word or PDF to plastics@gov.bc.ca.

Questions:

1. Checkout bags

- a. How will the proposed provincewide ban on plastic checkout bags, and fees on paper and new reusable checkout bags, affect your business or the businesses/organization you represent?
- b. Do you support the intentions paper's definition of reusable bag? Why or why not?
- c. Are you aware of any checkout bag exemptions that should or should not be included?

2. Foodservice accessories

- a. How will foodservice accessories being by-request-only affect your business or the businesses/organization that you represent?
- b. Under the proposed regulation, self-service stations would be permitted as they meet the 'by-request' requirement. Are self-service stations important and/or helpful to your business or the businesses/organization you represent?
- c. Are there any disposable foodservice accessories that should or should not be exempt from the regulation?

3. Problematic plastic food packaging

- a. Do you support a provincewide ban on containers and certain food packaging made from problematic plastics (i.e., polystyrene foam, PVC, compostable plastics) and on all oxo-degradable packaging? Why or why not?
- b. The proposed provincewide regulation includes takeout containers, polystyrene foam or PVC meat and deli trays, and other containers used to package food in the province. Do you have any concerns regarding the range of items that would be regulated?

- c. Food packaging made from compostable plastics will also be banned under the proposed provincewide regulation. How would restrictions on compostable plastic food packaging affect your business or the businesses/organization you represent?
 - d. Would your business or the businesses/organization you represent be interested in joining or starting a reuse program to reduce waste from containers and other single-use items? Why or why not?
- 4. Spheres of Concurrent Jurisdiction – Environment and Wildlife Regulation.
 - a. The intentions paper identifies further opportunities for municipalities to be empowered to regulate single-use and plastic items under the [Spheres of Concurrent Jurisdiction – Environment and Wildlife Regulation](#). How would this affect your business or the businesses you represent?
- 5. Future actions
 - a. Where does your business or the business/organization you represent see a need for further action on single-use and plastic waste?
 - b. What information or guidance would be helpful for your business or the business/organization you represent to transition away from banned and restricted single-use items and packaging?
 - c. What actions are needed to promote reuse/refill and/or recycled content to replace single-use items and address single-use and plastic waste?
- 6. Compliance and measuring success
 - a. What factors should be considered when developing reporting requirements for businesses to measure progress?

Preventing Plastic and Single-Use Waste in B.C.

Written Response Questions

Indigenous Nations and Communities, and Local Governments

All written feedback received during the comment period will be considered in the development of the regulation and next steps.

Please consider the numbered questions to guide your response.

Feedback for each comment should include:

- The question being addressed, or section of the intentions paper to which the comment relates;
- The comment itself; and
- Any supporting information or rationale.

Written submissions should be no longer than five pages and be submitted in Word or PDF to plastics@gov.bc.ca.

Questions:

1. Checkout Bags and By-Request

- a. The proposed regulation includes provincewide implementation of the same powers currently granted to municipalities under the [Spheres of Concurrent Jurisdiction – Environment and Wildlife Regulation](#) (i.e., bans on single-use plastic checkout bags, fees on single-use paper and reusable bags, and utensils by-request). What should the Province consider as it looks to implement restrictions on bags and foodservice accessories across the entire province?

2. Problematic plastic food packaging

- a. The proposed regulation includes a provincewide ban on containers and certain food packaging made from problematic plastics (i.e., polystyrene foam, PVC, compostable plastics) and on all oxo-degradable packaging. Do you have any concerns regarding the types of plastic that would be regulated? Are there any other types of plastic the Province should consider?
- b. The proposed regulation includes takeout containers, polystyrene foam and PVC meat and deli trays, and other containers used to package food in the province. Do you have any concerns regarding the types of food packaging that would be regulated?
- c. Food packaging made from compostable plastics would also be banned under the proposed regulation. Do you have comments specific to the regulation of compostable plastics?
- d. Are there any other problematic plastics that should be addressed through provincial regulation?

3. Spheres of Concurrent Jurisdiction – Environment and Wildlife Regulation

- a. The intentions paper identifies further opportunities for municipalities to be empowered to regulate single-use and plastic items under the Spheres of Concurrent Jurisdiction – Environment and Wildlife Regulation. Is your municipality likely to use this existing regulation to take (further) action on single-use or plastic items?
- b. What other materials or items are causing waste challenges in your community? Does your community have a plan to address these challenges?

4. Future actions

- a. Where does your community/local government see a need for further action on single-use and plastic waste?
- b. What actions are needed from the Provincial government to support reuse/refill and/or recycled content to replace single-use items, and prevent single-use and plastic waste?
- c. What types of education or promotional material would be most useful in your community regarding the proposed regulations and/or moving to reusable and/or refillable options?

5. Compliance and measuring impact

- a. Now, and under the proposed expansion of the Spheres of Concurrent Jurisdiction – Environment and Wildlife regulation, municipalities with single-use bylaws would be able to lead compliance, as necessary. How can/could the Province best support these activities?
- b. What reporting requirements should be considered for measuring the impact of the regulation?

APPENDIX D: WRITTEN SUBMISSION SOURCES

Organization	Submission Category
Alberta Plastics Recycling Association	Industry/Associations
Association of Home Appliance Manufacturers	Industry/Associations
B.C. Brewers Recycled Container Collection Council	Industry/Associations
BASF	Industry/Associations
BC Agriculture Council	Industry/Associations
Binbreeze	Industry/Associations
Biodegradable Products Institute (BPI)	Industry/Associations
British Columbia Restaurant and Foodservices Association	Industry/Associations
BSIBio	Industry/Associations
Canada Coalition of Plastic Producers	Industry/Associations
Canadian Consumer Specialty Products Association	Industry/Associations
Canadian Federation of Independent Business	Industry/Associations
Canterbury Coffee	Industry/Associations
Cascades Groupe Produits Specialises (Northbox)	Industry/Associations
Champagne and Aishihik First Nations	Indigenous
Chemistry Industry of Canada	Industry/Associations
City of Campbell River	Local Government/Regional Authorities
City of Chilliwack	Local Government/Regional Authorities
City of Colwood	Local Government/Regional Authorities
City of Coquitlam	Local Government/Regional Authorities
City of Kamloops	Local Government/Regional Authorities
City of Richmond	Local Government/Regional Authorities
City of Vancouver	Local Government/Regional Authorities
City of Victoria	Local Government/Regional Authorities
CKF Incorporated	Industry/Associations
Clorox Canada	Industry/Associations
Coffee Club LP	Industry/Associations
Columbia Shuswap Regional District	Local Government/Regional Authorities
Compost Council of Canada	Industry/Associations
Convenience Industry Council of Canada	Industry/Associations
Cowichan Valley Regional District	Local Government/Regional Authorities
District of Squamish	Local Government/Regional Authorities
District of West Vancouver	Local Government/Regional Authorities
DoorDash Canada	Industry/Associations
E5 Solutions	Industry/Associations
EcoSafe Zero Waste	Industry/Associations
Erthos inc.	Industry/Associations
Foodservice Packaging Institute	Industry/Associations
Greenpeace	NGO
Hospitality Business	Industry/Associations
Interior Health	Local Government/Regional Authorities
International Pacific Sales Ltd.	Industry/Associations
Kwikwetlem First Nation	Indigenous
Lilwat Nation	Indigenous
Malahat Nation	Indigenous
Master Recycler Vancouver	Industry/Associations
Metro Vancouver	Local Government/Regional Authorities
Musqueam Indian Band	Indigenous
Nazko Band	Indigenous

Organization	Submission Category
Newlight	Industry/Associations
Nlaka'pamux Nation Tribal Council	Indigenous
Pactiv Evergreen	Industry/Associations
Recycle BC	Industry/Associations
Recycling Alternative	Industry/Associations
Refresh Packaging	Industry/Associations
Regenerative Waste Labs	Industry/Associations
Regional District of Central Okanagan	Local Government/Regional Authorities
Regional District of Kitimat-Stikine	Local Government/Regional Authorities
Regional District of Nanaimo	Local Government/Regional Authorities
Resort Municipality of Whistler	Local Government/Regional Authorities
Restaurants Canada	Industry/Associations
Retail Council of Canada	Industry/Associations
Scotts Canada Ltd.	Industry/Associations
Shishalh Nation	Indigenous
Simpcw First Nation	Indigenous
Skip the Dishes	Industry/Associations
Squamish Nation	Indigenous
Surfrider Foundation Canada	NGO
Terravis Holding Ltd.	Industry/Associations
Tiggy Delivery Corporation	Industry/Associations
Tourism Industry Association of BC	Industry/Associations
Vancouver Coastal Health	Local Government/Regional Authorities
Witset Nation	Indigenous
Zero Waste BC	NGO