
RECOMMENDATION:

(a) That the City of Hamilton supports the Canadian Council of Ministers of the Environment (CCME) Discussion Paper: Towards a Proposed Canada-Wide Action Plan for Extended Producer Responsibility (EPR);

(b) That the City of Hamilton supports the Canadian Council of Ministers of the Environment Discussion Paper: Towards a Proposed Canada-Wide Action Strategy for Sustainable Packaging;

(c) That Report PW09040 be submitted to the CCME as the City’s comments on the discussion paper;

(d) That copies of this report be sent to the Federal Minister of the Environment, local Members of Federal Parliament, Federation of Canadian Municipalities (FCM), the Ontario Minister of the Environment, the Association of Municipalities of Ontario (AMO), the Municipal Waste Association (MWA) (formerly the Association of Municipal Recycling Coordinators) and the Regional Public Works Commissioners of Ontario (RPWCO).

Gerry Davis, CMA
Acting General Manager
Public Works Department
EXECUTIVE SUMMARY:

In February 2009 the Canadian Council of Ministers of the Environment’s Extended Producer Responsibility Task Group issued two (2) Discussion Papers for consultation:


2) Discussion Paper: Towards a Proposed Canada-Wide Strategy for Sustainable Packaging

The Waste Management Division is pleased that the Canadian Council of Ministers of the Environment has issued these discussion papers. The papers present a major opportunity to influence Extended Producer Responsibility policy for the future across Canada.

The objectives of the first paper are to seek the adoption by producers of full life-cycle costs accounting for their products through a Canada-Wide Action Plan (CAP) for Extended Producer Responsibility. Successful EPR shifts the expenses associated with product end-of-life management from taxpayers to producers and consumers and reduces the amount of waste generated and being disposed of. The implementation plan for EPR would seek to have priority products and materials incorporated into programs in two (2) phases.

The second paper is part of the broader proposed Canada-Wide Action Plan for Extended Producer Responsibility. The proposed strategy’s purpose is to reduce packaging waste in Canada and promote more sustainable packaging choices.

The two (2) proposed initiatives are complementary. EPR requires producers to take financial and/or physical responsibility for the packaging at the end of its life. The proposed Strategy for Sustainable Packaging will build on guidance provided in the CAP for EPR.

It is recommended that the two (2) Discussion Papers be supported as a Canada-wide strategy will ensure consistency for producers, consumers and municipalities across the country. Implementation of the plans could lead to increased waste reduction and diversion and more sustainable packaging. However, staff has indicated comments and concerns surrounded some aspects of EPR. These comments are explained in detail in the Analysis/Rationale section of this report.

BACKGROUND:

The information contained in this report has City wide implications.

The Canadian Council of Ministers of the Environment has established an Extended Producer Responsibility Task Group (EPRTG) to provide guidance on the development and implementation of EPR and product stewardship programs. The EPRTG has prepared Discussion Paper: Towards a Proposed Canada-Wide Action Plan for Extended Producer Responsibility and Discussion Paper: Towards a Canada-Wide
Strategy for Sustainable Packaging for a ninety (90) day consultation period ending May 29, 2009.

Currently, municipalities in Ontario are receiving some funding from industry for programs regulated under the Waste Diversion Act (WDA) which was enacted in 2002, participating in the Blue Box Program Plan (BBPP), Municipal Hazardous and Special Waste (MHSW) and Waste Electrical and Electronic Equipment (WEEE). The purpose of the Act is to set a framework for waste diversion program operations or designated materials and cost-sharing of program costs between municipalities and industries generating the materials.

The federal government regulates imports, labelling requirements and restrictions on packaging with respect to food and product safety through the Consumer Packaging and Labelling Act. However, this act does not focus on the reduction or end of life management of packaging but deals with packaging with regards to consumer safety.

The Packaging Audits and Packaging Reduction Work Plans Ontario Regulation under the Environmental Protection Act mandates that large food and beverage, paper, and chemical manufacturers and importers examine the impact of packaging through audits and create waste management plans to reduce the amount of waste resulting from packaging.

Some packaging waste is captured and diverted through the Blue Box Program. However, there is still a significant quantity of problematic packaging and multi-material packaging that is unable to be recycled.

Recent Public Works Committee reports related to Extended Producer Responsibility include:


In these reports, the City of Hamilton has supported the concept of Extended Producer Responsibility, however, has raised concerns about implementation. Questions around a number of matters including the future roles and responsibilities, accountability and transparency have been identified in the above noted reports. These previous comments will be considered in this report. Staff has also completed the response forms available and these are included as Appendices A and B to this report.
ANALYSIS/RATIONALE:

This section of the report will provide an analysis on the impact on the City’s waste management system, programs and the residents of the City.

Recommendation 14 of the Solid Waste Management Master Plan states that the City should continue to lobby the federal and provincial governments to do everything in their power to support municipalities with waste management programs with appropriate legislation, funding and fiscal policy.

The proposed Canada-Wide Action Plan on Extended Producer Responsibility and Strategy for Sustainable Packaging follows Recommendation 14 and the City’s direction on waste diversion. Although the strategies proposed in the Discussion Papers should have a positive impact on the City’s waste management system, however the City offers the following comments around a number of issues. In addition, staff has completed the response forms for the two (2) Discussion Papers and these are included as Appendices A and B to this report.

a) Integrated Waste Management Systems

Municipalities that operate fully integrated waste management systems, including a recycling program, have concerns with the operation of a full EPR system. A full EPR system may result in less material being collected in the recycling program therefore more waste being sent to the City’s landfill. Many of these comments are similar to those raised with regard to changes to the Blue Box Program Plan.

b) Service Levels for Residents

It is vital that the level of service currently provided to residents must be maintained or improved where possible when implementing a Canada-Wide Action Plan for EPR and Strategy for Sustainable Packaging.

c) Fee Visibility

The Towards a Proposed Canada-Wide Action Plan for Extended Producer Responsibility Discussion Paper proposes that the costs associated with an EPR program should be internalized as a factor of production of the product and not be visible to the consumer.

Fees for producers of products and packaging would appear to be best dealt with as part of the production cost with the hope that as producers are motivated to innovative product development, the cost would be reduced. At the same time, consumers will pay fees through purchasing choices. The role of educating consumers may continue to be borne by municipalities. If this continues it should be clear that fees are to be used for their intended purpose, to fund the environmental management of the products including a contribution to municipalities for the education component. However this should not go to other levels of government.
d) Current Blue Box Program

Staff has concerns that full EPR may impact on the future of Ontario’s Blue Box Program which residents have become accustomed to. The Blue Box Program is a mature curbside collection program and the revenue generation offsets program costs.

e) Consultation

The City would like to suggest CCME ensure that sufficient consultation is given with regard to implementation plans, timelines, performance measures and targets and that sufficient timeframes be set for consultation processes. Municipalities must play a key role in the consultation process.

**ALTERNATIVES FOR CONSIDERATION:**

This section of the report will provide overviews of the two (2) Discussion Papers including the issues and staff comments on how the alternatives impact on waste management programs and the residents of the City.


a) **Purpose**

The purpose of a Canada-Wide Action Plan for EPR is to harmonize the principles of producer responsibility across the country in a consistent manner. By shifting the responsibility for the end-of-life management of products to the manufacturers and/or importers of products, effects will be felt throughout the products life cycle.

Through the use of EPR, CCME seeks to transform Canada, one of the world’s largest per capita generators of waste, into one of the world’s leaders in sustainable product design and end-of-life product management.

b) **Proposed Strategies**

The proposed strategies of CAP would be to build the level of manufacturer responsibility for the management of their products by increasing the number of categories managed under EPR programs. Other strategies of the Plan would be to harmonize EPR principles with regulatory framework and to monitor and report on program performance in a consistent manner.

c) **Proposed Targets**

Phase 1 - operational programs within a set timeframe (e.g. six years) of the adoption of CAP:

- Packaging (in accordance with the Discussion Paper: Towards a Proposed Canada-Wide Strategy for Sustainable Packaging)
- Printed material
- Compact fluorescents and other lamps containing mercury
- Electronics and electrical products
- Household hazardous and special waste

- Automotive parts

Phase 2 - operational programs within a set time frame (e.g. eight years) of the adoption of the CAP

- Construction and demolition materials
- Furniture
- Textiles and carpet
- Appliances including ozone-depleting substances (ODS)

Pursuant to Recommendation 14 of the Solid Waste Management Master Plan, these Discussion Papers align with the City’s mandate to lobby senior government.

This Discussion Paper is the first step in the creation of a federal policy on Extended Producer Responsibility which is a positive initiative by the federal government related to the waste management industry.

By not supporting this Discussion Paper on Extended Producer Responsibility the City of Hamilton would be missing the opportunity to influence the shift in responsibility of the product life-cycle upstream to the producer and away from the municipality.


a) **Purpose**

The purpose of the proposed Strategy for Sustainable Packaging is to reduce packaging waste in Canada and promote more sustainable packaging choices. The proposed strategy provides guidelines to stakeholders involved in production and consumption of packaging as well as government. The proposed strategy applies to all types of packaging including but not limited to:

- Food packaging
- Beverages and other products by manufacturers and distributors
- In-store packaging by restaurants and retailers

b) **Key Issues**

The EPRTG has identified eight (8) key issues or concerns related to packaging which were considered in the development of the proposed strategy and could benefit from stakeholder input:

- Information on packaging generation and management
- Low packaging recovery rate
- Communication of proper management of packaging products
- Appropriate end markets
- Excessive packaging
- Designing sustainable packaging
- External constraints on packaging decisions
- Toxicity concerns
Currently, municipalities are being burdened with the costs of an industry generated problem, problematic and excess packaging. Problematic packaging increases the cost to the municipality to manage the waste. Consumer demand for greener products and reduced packaging has also increased. By not supporting the Discussion Paper the City of Hamilton would be missing the opportunity for industry to reduce packaging and improve packaging sustainability.

The principles outlined in both Discussion Papers are consistent with the City’s direction on waste management and the fulfilment of the Solid Waste Management Master Plan.

**FINANCIAL/STAFFING/LEGAL IMPLICATIONS:**

Supporting the two (2) Discussion Papers would result in no direct staffing or legal implication for the City. There are no financial implications from responding to the Discussion Papers. Any financial, legislative or regulatory changes that might result from the Discussion Papers would require future reporting back to Council.

**POLICIES AFFECTING PROPOSAL:**

- **Corporate Strategic Plan**
  The reduction of packaging waste aligns with the target of 65% diversion in Performance Measure 6.5 of Focus Area 6 Environmental Stewardship.

- **Public Works Strategic Plan**
  Product stewardship can contribute to more sustainable budgets and a greener city however full EPR may negatively impact on community recycling programs, most particularly the Blue Box Program.

- **Solid Waste Management Master Plan (SWMMP)**
  The policies affected by the concepts of the Discussion Paper are the following recommendations of the Solid Waste Management Master Plan (SWMMP), specifically:

  Recommendation #2 - “The Glenbrook landfill is a valuable resource, and the City of Hamilton must optimize the use of its disposal capacity to ensure that there is a disposal site for Hamilton’s residual materials that cannot be otherwise diverted.”

  Recommendation #3 - “The City of Hamilton must set an aggressive objective of 65% waste diversion by the end of 2011, based upon 2000 waste generation rates.”

  Recommendation #14 - “The City of Hamilton should continue to lobby the federal and provincial governments to do everything in their power to support municipalities with waste management programs with appropriate legislation, funding and fiscal policy. In the short term the City of Hamilton should request the Province to enact and implement Bill 90 as soon as possible.”
The contents of the two Discussion Papers have been reviewed with the Solid Waste Management Master Plan Steering Committee and Waste Reduction Task Force.

On April 15, 2009 the Waste Reduction Task Force passed the following motion:

“The City of Hamilton’s Waste Reduction Task Force recognizes the efforts put forth to standardize waste management practices across Canada and respectfully requests the Council of the City of Hamilton to support the CCME CAP for EBR subject to consideration of:

The impact on private citizen contribution and lack of municipal control over items to be destined for landfill due to regulated EPR products.

The possible termination of curbside collection of recycled goods on the premise that this would negatively affect the disadvantaged, disabled, and our rapidly aging population.

Any unfair competitive advantage that might be given to businesses who may be deemed as ‘small’ and therefore are entitled to an EPR fee exemption, as this automatically provides a lower cost structure to the ‘small’ producer.

Any proposal which would see ‘hidden’ fees applied to any product within the EPR program, as it is paramount that the consumer is fully educated in the costs associated with the purchase decision, while minimizing marketing masking of true effects of proposed fees.”

These comments have been considered where appropriate in the preparation of this report.

By evaluating the “Triple Bottom Line”, (community, environment, economic implications) we can make choices that create value across all three bottom lines, moving us closer to our vision for a sustainable community, and Provincial interests.

Community Well-Being is enhanced. ☑ Yes ☐ No
Extended Producer Responsibility supports the City’s waste diversion goals.

Environmental Well-Being is enhanced. ☑ Yes ☐ No
Sustainable Packaging and Extended Producer Responsibility reduce the consumption of natural resources.

Economic Well-Being is enhanced. ☑ Yes ☐ No
Extended Producer Responsibility could reduce waste management costs.

Does the option you are recommending create value across all three bottom lines? ☑ Yes ☐ No

The concepts in the Discussion Papers would contribute to the reduction of environmental impact through waste reduction and diversion from landfill and may result in the reduction of collection and disposal costs.

Do the options you are recommending make Hamilton a City of choice for high performance public servants? ☑ Yes ☐ No

Not relevant.
**Response Form: Consultation on the draft Canada-wide Action Plan for Extended Producer Responsibility (EPR).**

Your responses will be sent by email when you click on the button at the bottom of the page. If you have difficulties please contact Daniel Friesen at dfriesen@ccme.ca or telephone (204) 948-2757.

<table>
<thead>
<tr>
<th>Question</th>
<th>Answer</th>
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<tr>
<td>1. Do you see value in CCME seeking through the adoption of the Canada-wide Action Plan for EPR, more harmonious and consistent EPR program regulation and implementation across the country?</td>
<td>We see value in the adoption of the Canada-wide Action Plan for EPR and are pleased that CCME has taken the initiative. The proposed strategies align with the City of Hamilton’s waste diversion policies and programs. National consistency in EPR should benefit municipalities.</td>
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<td>2. Do you see EPR as an environmental instrument which can be used to encourage design for the environment in products and improved product life cycle environmental performance? Can EPR policies, regulations and programs be structured to maximize incentives for improved environmental performance in products?</td>
<td>When implemented correctly EPR can be used as an environmental instrument which can be used to encourage design for the environment in products and improve life cycle performance.</td>
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<td>3. Do you see the benefit in shifting the focus of responsibility for EPR programs to the producers, who are responsible for the design and manufacturing of products?</td>
<td>The benefits should include the reduction of waste generated and going to the landfill, reduce toxicity risk from products, improve overall life cycle performance, and reduce GHG emissions. However impacts on municipal integrated waste management systems should also be considered.</td>
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<tr>
<td>4. Do you agree with the list of priority products (Phase 1 and Phase 2) identified for risk management through EPR regulations and programs?</td>
<td>We have no major concern with the list of priority products. Some additional products to consider include tires, wood and metal.</td>
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<td>5. Do you agree with the scheduled timetables for EPR action - framework legislation within 5 years of the EPR Action Plan's adoption, operational Phase 1 programs within 6 years and operational Phase 2 programs within 8 years?</td>
<td>Perhaps the legislation could be earlier, as 1 year between the framework legislation and operational Phase 1 seems optimistic and additional time may be needed to implement operational programs.</td>
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<td>6. Do you agree that the 5 key performance indicators suggested are useful measures of the efficiency and effectiveness of operational EPR programs? Are there any key performance indicators which are missing?</td>
<td>The key performance indicators are acceptable, however consideration should be given to tracking residential and non-residential separately. The use of a cost per kilogram of material captured or recovered may not be as useful due to varying operations and fluctuating markets.</td>
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<tr>
<td>7. Do you agree with the key EPR program elements identified and in particular with how issues such as fees, targets, stewardship plans, reporting and Producer Responsibility Organization responsibilities are addressed?</td>
<td>We agree with the key program elements identified in the document and how they are addressed, with emphasis on reporting and performance monitoring.</td>
</tr>
<tr>
<td>8. Should EPR programs be supported with other policies and regulations and if so is the list of supportive policies and regulations identified in the Canada-wide Action Plan appropriate?</td>
<td>EPR programs should be supported with other policies and regulations. The list of supportive policies and regulations identified in the document should also include provincial/territorial regulations such as the Ontario Waste Diversion Act.</td>
</tr>
<tr>
<td>9. How should federal, provincial and territorial government roles and responsibilities for the implementation of the Canada-wide Action be addressed?</td>
<td>The federal and provincial/territorial governments should be the governing bodies responsible for the development of EPR policies and strategies which may include the measures listed, as well as provincial/territorial regulatory mechanisms for more specific needs.</td>
</tr>
<tr>
<td>10. Is there a role for municipal governments in the implementation of a Canada-wide action plan for EPR? If so, what is it?</td>
<td>The municipal government’s role is through continued consultation with CCME and the federal/provincial government regarding EPR programs. EPR may also affect municipalities by changing or reducing material being collected in the recycling program thereby increasing waste being sent to the landfill. The City of Hamilton would also like to ensure the level of service provided to our residents be maintained or improved where possible. Municipalities must be involved in the implementation of any action plan to ensure that local waste collection, processing and disposal systems can adapt to changes as they are implemented.</td>
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Consultation on the Canada-wide Strategy for Sustainable Packaging framework

Your responses will be sent by email when you click on the button at the bottom of the page. If you have difficulties please contact Daniel Friesen at dfriesen@ccme.ca or telephone (204) 948-2757.

1. Would you support the vision, guiding principles, goals and targets, and roles and responsibilities as outlined in the document? Are there changes you would suggest?

   Yes, we support the vision, guiding principles, goals and targets, roles and responsibilities as outlined in the document.

2. Are there other guiding principles that should be considered?

   Guiding principles should consider the impact on residential waste diversion programs and impacts on municipal integrated waste management systems.

3. Are the proposed targets appropriate? What alternatives can you suggest?

   The proposed targets are appropriate. Consideration should also be given to a target for the recyclability/reusability of packaging.

4. What is the best way to access and coordinate data needed to support the strategy? Can you suggest existing or potential sources of data that could support performance measurement of the strategy?

   The best way to access and coordinate data needed to support the strategy is through a national coordinating body. Data could be accessed online. Some existing sources of data would be Ontario Waste Diversion Ontario data call information.

5. Have the roles been effectively identified and defined? Have any key responsibilities been missed? What do you see as your/your organization's role?

   The proposed roles and responsibilities outlined on page 12 lists municipal government roles together with provincial/territorial and federal governments roles. As a municipality we see our role as reporting data and educating the public through community outreach efforts.

6. Would you support the actions and activities proposed in the strategy? Are there any actions or activities you would not support? Why?

   Yes, we support the proposed actions and activities proposed in the strategy.

7. Which items would you identify as priorities? What additional or alternative actions would you suggest?

   The items we identify as priorities are excessive packaging, designing sustainable packaging, and appropriate end markets. However reporting on performance should also be a priority.

8. EPR requirements for packaging are the key action proposed in the strategy. Do you agree that this is the best approach to achieve the goals of the strategy?

   Yes, the EPR requirements for packaging are the key actions proposed in the strategy.

9. What do you see as your/your organization's role in implementation of the strategy's proposed actions and activities? What barriers do you see to effective implementation? Are there incentives or support that would allow you to play a more effective role?

   As a municipality we see our roles as reporting data and educating the public through community outreach efforts. A major barrier to effective implementation is the lack of commitment and cooperation of key players (i.e. industry, government). Incentives or support that would allow industry to play a more effective role include tracking of packaging materials through the municipal waste tonnage data. Municipalities must be involved in the implementation of any action plan to ensure that local waste collection, processing and disposal systems can adapt to changes as they were implemented.

10. In your opinion, will the strategy presented reduce packaging waste in Canada and promote more sustainable packaging choices at all life-cycle stages?

    The strategies presented can reduce packaging waste and promote more sustainable packaging choices if implemented.
TOWARDS A CANADA-WIDE ACTION PLAN FOR EXTENDED PRODUCER RESPONSIBILITY

EXECUTIVE SUMMARY

Introduction
In 2006, Statistics Canada data showed Canadians generated almost 1,100 kg of municipal solid waste per person, up 8 per cent from 2004. This represents about 35 million tonnes, of which just over 27 million tonnes was sent for disposal in landfills and incinerators and another 7.7 million tonnes was diverted as recyclables or organics. Nationally the rate of diversion from landfill and incineration was 22 per cent, with the highest rate of diversion for a provincial jurisdiction being 41 per cent. Since the rate in 2004 was also 22 per cent, this suggests little or no progress in enhancing the extent or effectiveness of waste recycling and organics programs over that period. Despite efforts by all levels of governments over the last three decades, Canada’s performance lags behind other G8 and Organization for Economic Cooperation and Development (OECD) countries when it comes to municipal solid waste diversion and disposal.

Extended Producer Responsibility
A waste management approach that has developed in response to these issues is the concept of the producers of products being responsible for their end-of-life management. Extended Producer Responsibility (EPR) is an environmental policy approach in which a producer’s responsibility for a product is extended to the post-consumer stage of its life cycle. Through a Canada-wide Action Plan (CAP) for EPR, the Canadian Council of Ministers of the Environment (CCME) is seeking to provide guidance on the development and implementation of EPR programs, to strengthen the use of EPR as an environmental risk-management tool and to contribute to the harmonization and consistency of programs across the country.

Objectives
A CCME CAP for EPR would seek the adoption by producers of full life-cycle cost accounting for their products. This would see the costs of the end-of-life management of products treated similarly to other factors of production and incorporated into wholesale and retail product prices. Successful EPR shifts the expenses associated with product end-of-life management from taxpayers to producers and consumers and reduces the amount of waste generated and going to disposal. In addition the Action Plan seeks to reduce the toxicity and environmental risks from products and product waste and improve the overall life-cycle performance of products, including reducing associated greenhouse gas emissions.

Implementation of the Canada-wide Action Plan for Extended Producer Responsibility

Canadian jurisdictions would agree to consider developing EPR framework legislation and/or regulations to allow for action on the identified priority products and materials.

The plan seeks to have the following products and materials incorporated into operational programs within a set time frame (e.g., six years) of the adoption of the CAP (Phase 1):

- Packaging
- Printed materials
- Compact fluorescents and other lamps containing mercury
Towards a Canada-wide Action Plan for Extended Producer Responsibility – Draft for Consultation

- Electronics and electrical products
- Household hazardous and special wastes
- Automotive products

The following products and materials could be incorporated into operational programs within a set time frame (e.g., eight years) of the adoption of the CAP (Phase 2):
- Construction and Demolition materials
- Furniture
- Textiles and carpet
- Appliances, including ozone-depleting substances (ODS)

**Key Performance Indicators**
A number of key performance indicators have been identified to produce a national annual status report on the performance of the priority EPR programs. These include: kilograms per capita captured or recovered; dollars per kilogram captured or recovered; per cent of waste captured, per cent of waste recovered; and avoided greenhouse gas emissions.

**Model EPR Program**
In order to facilitate the creation of consistent and harmonious EPR regulations and programs, the discussion paper outlines a number of common elements that set out recommendations for all EPR programs to ensure common interpretation and application. These elements include consideration of the responsibilities of designated producers and producer responsibility organizations, relationship to stewardship plans, the establishment of targets and reporting mechanisms, the creation of fees and design for environment. The EPR program elements are designed so that through a successful EPR program, and the regulations which mandate it, cost and management signals are given to producers to improve the life-cycle performance of their products knowing that at some point in the future they will be responsible for the collection, recycling and the environmentally sound management of products that would otherwise be discarded.

**Supportive Policies and Regulations**
In a complex and competitive national and global business market signals to producers from a relatively small market like Canada may not be strong enough alone to influence new environmentally conscious product design and supply chain management. The environmental objectives of EPR may therefore need to be supported and reinforced by other measures, such as: eco-labelling; restrictions on toxic substances; recycled content standards and regulations; green procurement policies; environmental performance/voluntary agreements and a variety of other potential standards, bans, guidelines and educational tools.

**A National Harmonized Approach**
The purpose of a CAP for EPR would be to extend the principle of producer responsibility across the country in a consistent and harmonized way and maximized across the national marketplace. By shifting the responsibility for the end-of-life management of products to the manufacturer and/or importer of that product, effects will be felt throughout the product life cycle. This provides incentives to producers and importers to design their products with less environmental risk, reduced use of toxic and hazardous substances, enhanced ease of product disassembly and other factors reducing their products' overall environmental footprint.
DISCUSSION DOCUMENT: TOWARDS A CANADA-WIDE STRATEGY FOR SUSTAINABLE PACKAGING

EXECUTIVE SUMMARY

The Extended Producer Responsibility Task Group (EPRTG) was established in 2005 by the Canadian Council of Ministers of the Environment (CCME) with a mandate to develop a broad approach to extended producer responsibility (EPR) and product stewardship, focusing first on packaging.

The EPRTG has created two documents to facilitate the conversation around these issues:
2) Discussion Document: Towards A Canada-wide Strategy for Sustainable Packaging

This discussion document on sustainable packaging is part of the broader proposed Canada-wide Action Plan for Extended Producer Responsibility.

Purpose
The purpose of the proposed sustainable packaging strategy is to reduce packaging waste in Canada and promote more sustainable packaging choices at all life-cycle stages: from raw material acquisition to disposal and/or reuse and recycling. The proposed strategy will increase awareness of sustainable packaging choices, introduce incentives to make more sustainable choices and potentially provide for systems to optimally recover packaging materials. The proposed strategy applies to all types of packaging, including, but not limited to: packaging of food, beverages and other products by manufacturers and distributors, in-store packaging by restaurants and retailers, and transport packaging.

The proposed strategy provides draft guidelines to stakeholders involved in the production and consumption of packaging and to governments and partners as they work towards its implementation.

Guiding Principles
This proposed strategy includes four key principles:
- Extended Producer Responsibility (EPR) – extends a producer’s responsibility for a product to the post-consumer stage of a product’s life cycle and encourages consideration of end-of-life management impacts during the design phase.
- Life-cycle sustainability – integrates environmental, economic and social considerations into decision making by all packaging actors and takes a closed-loop approach to material management where the flow of materials eliminates waste.
Towards a Canada-wide Strategy for Sustainable Packaging – Draft for Consultation

- **Zero waste** – seeks to redesign the way resources are used, with the aim of eliminating waste, by focusing on redesigning products and processes to reduce waste before it is made and design products for greater reuse of resources.
- **Polluter pays** – promotes the internalization of environmental costs and the use of economic instruments as a way to ensure that those responsible bear the costs attached to choices with environmental impacts.

**Proposed Actions**
The actions proposed by the strategy under consideration include the following:

- **Introduce province-wide EPR requirements for packaging within a set time frame** (e.g., five years) **following the approval of the proposed Canada-wide Action Plan for EPR**.
- **Negotiate agreements with specific industry sectors to reduce packaging and improve its sustainability**.
- **Support the development of consistent guidelines, standards and/or visual identification for reusable, recyclable and compostable packaging and recycled content of packaging**.
- **Support the development of sustainability criteria for packaging that reflect the entire life cycle**.
- **Support the development of educational initiatives that promote sustainable packaging design and best practices. This may include a recognition program to recognize efforts to redesign packaging**.
- **Support the establishment of an ombudsman to address specific complaints of excess packaging identified by consumers**.

**Implementation**
Multiple considerations have been presented for implementation of the actions proposed in the strategy, including: possible legislative and program development by provinces and territories; partnerships with existing organizations; the creation of a national coordinating entity (to develop standards and function as a packaging ombudsman); a role for the federal government, and the use of a various legislative and regulatory measures to harmonize the implementation of the strategy. A timeline is also included to illustrate the possible timing of implementation and how these actions address the goals of the strategy.

**A Note on Best Practices**
In support of the development of the strategy, the EPRTG researched best practices to address packaging sustainability. An overview of some of the best practices reviewed, with a variety of case studies, is included in Appendix D.