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Mr. Francis Scarpaleggia, MP
Chair, Standing Committee on Environment and Sustainable Development
Sixth Floor, 131 Queen Street
House of Commons
Ottawa ON
K1A 0A6

Delivered via email: ENVI@parl.gc.ca

RE: Private Member's Bill C-204: An Act to amend the Canadian Environmental Protection Act, 1999 (final disposal of plastic waste)

Dear Mr. Scarpaleggia:

On behalf of the Ontario Environment Industry Association (ONEIA), we are pleased to provide this letter of support of the Chemistry Industry Association of Canada's submission of March 12 outlining its concerns regarding Bill C-204, an Act to amend the Canadian Environmental Protection Act, 1999 (final disposal of plastic waste).

Background

ONEIA is the business association representing the interests of the environment and cleantech industry in Ontario. Our network of thousands of contacts includes key environmental technology, product and service companies, law, investment and insurance firms, institutes, universities, and governments. At ONEIA, our main focus is to support the work of these organizations. Since our founding in 1991, we have grown into an effective and respected industry association that works with provincial and federal policymakers to advocate for policies based on sound science, a sound environment, and a sound economy.

Many ONEIA member companies work in the waste services area and play a pivotal role in increasing the diversion of materials from landfill by collecting and processing these materials in an environmentally responsible manner and returning them to productive economic use.

ONEIA has long advocated for a truly joint process whereby governments set the policy outcomes they want and then collaboratively engage with industry and other stakeholders to determine the best way to achieve these outcomes. It is important to note that ONEIA does not believe in "silver bullet" or "one size fits all" approaches, particularly given the geographic, social and economic diversity of Canada. What works in one province, territory or region may not be efficient or effective in others.

ONEIA strongly recommends that all levels of government engage with private waste services companies, among other pertinent stakeholders along the materials chain of custody, to discuss key challenges and opportunities to increase waste diversion and facilitate resource recovery in both the municipal and industrial, commercial, and institutional (ICI) sectors.

General observations related to Bill C-204

ONEIA shares the concerns of CIAC that Bill C-204, if approved, would negatively affect the resource recovery industry. In particular, Bill C-204 does not take into account:

- The intricate north-south business relationships and supply chains that have been established to repurpose what we used to refer to as “waste” into productive re-use;
- The fact that countless cross-border shipments are made each year to facilities that have the ability, capacity and interest to do additional sorting for specific plastic types;
- The fact that Canada’s manufacturing sector is not as robust as that of the US and what we might designate for final disposal can actually be productively used by manufacturers in the US for other purposes;
- That some of the plastic types that are not recycled in Canada may have reuse options at facilities in the US;
- That by reducing access to the US, we would be limiting our access to their infrastructure and hampering Canadian businesses; and
- The overall push towards a circular economy is undermined if we limit the ability of companies to find the most productive re-use scenario for recycled products.

Specific ONEIA recommendations

ONEIA believes further study needs to be undertaken, in consultation with the private waste services industry, to develop a more focused and robust national waste diversion strategy.

To that end, we would offer the following specific recommendations:

1. Any waste diversion strategy must include all stakeholders involved in the chain of custody of materials and include representatives from private waste services companies involved in collection and post-collection activities.
2. Any discussion of the structure or restructuring of waste diversion and management policies and regulations should:
 - be outcomes-based;
 - provide economic incentives to encourage investment;
 - promote collaboration and interaction through open and competitive markets; and,
 - be flexible to encourage continuous improvement and innovation through the support and development of innovative technologies.
3. Any form of public policy that requires the participation of private waste service providers must recognize that designing and implementing any incentives must be done in a manner that promotes the sustained viability of the markets they affect. Not doing so could reduce and/or eliminate competition and lead to higher prices, reduced product choice, lower service, and less innovation, thereby becoming a burden on businesses and taxpayers.
4. ONEIA would strongly recommend that the government consult with the Federal Competition Bureau when contemplating waste diversion initiatives for the ICI as well as the municipal sector.
5. Producers (including brand owners and first importers) must be fiscally responsible when managing their products and packaging at their end-of-life. However, we do not recommend that producer responsibility programs currently in place for municipal diversion programs be supported by federal measures that would encourage their expansion to the ICI sector as these programs would likely exacerbate the current situation.

6. ONEIA members are supportive of harmonizing provincial and national standards and definitions to ensure that claims of recyclability and compostability are verifiable and to ensure local markets are not dealing with materials that they cannot process.
7. Any targeted action on reducing plastic, packaging (including bans, fees, or recycled content requirements) and other products must undergo a science-based life-cycle analysis (which includes economic factors) before approval and implementation so as not to cause unintended economic and environmental consequences.
8. ONEIA would encourage all levels of government to explore procurement programs that would stimulate “end markets” for recycled materials and that such markets be facilitated by cross-border connections that help those materials find their best, most productive use.
9. ONEIA recommends that the federal government commit to ensuring that any new initiatives designed to improve materials diversion maintain an open and competitive market and improve regulatory certainty. ONEIA believes these actions will create a public policy environment that will encourage end markets for plastics as well as other materials and address disconnects along the materials chain of custody.

Thank you for considering our feedback and, should you have any questions, feel free to reach out to us at info@oneia.ca.

Yours truly,



Alex Gill
Executive Director

c.c.

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