

PAC NEXT response to Bill 151 Waste Free Ontario Act and Draft Provincial Strategy

This represents the considered response of PAC, Packaging Consortium and PAC NEXT an initiative of PAC, to Bill 151 Waste Free Ontario Act and the Draft Provincial Strategy.

PAC NEXT supports and welcomes this proposed shift to a circular economy that drives innovation and shifts the way that we view waste and, in particular, packaging waste. PAC NEXT was created in 2011 by PAC with a vision of *A World Without Packaging Waste*. We have led this discussion across the value chain and our collaborative goal is to find cost effective solutions that maximize the recycling rates and value of ALL recovered packaging materials. We feel confident that Bill 151 and the proposed Provincial Strategy can create a platform consistent with our vision and goals.

Collective Responsibility – Communication, Collaboration and Education

The general mindset that the producers are the sole body responsible for packaging waste is a misrepresentation of the reality. The subject of waste is a complex issue that integrates many stakeholders. It took several decades to create the consumption society but we trust and want to ensure that it will not take decades to achieve the Circular Economy and COP21 ambitious goals. It will take recognition of the complexity of the issue and will take the entire supply chain to work in collaboration to achieve the goals of Bill 151 Waste Free Ontario Act.

Packaging has an important role to play

Packaging all too often is seen as a nuisance rather than as a highly valuable asset that plays an important role across the value chain. We recommend taking a life cycle approach to assessing the value of packaging and the positive impacts it has on:

- protecting and preserving products during transportation, in store and in the home,
- reducing food waste
- providing safety, convenience and information for consumers,
- reducing environmental footprints by using the right amount of packaging to do the job at hand.

Specific Comments are made with respect to the Printed Paper and Packaging Program:

We encourage the Minister to consider the following principles and recommendations as he sets out the strategy for a Waste Free Ontario:

- ***The Provincial Strategy should be long term and set progressive performance standards*** that encourage adoption of best practices to ensure best environmental outcomes. The Provincial Strategy and any pending regulation should be aligned with the COP21 Paris 195 nation agreement to combat climate change and ensure actions and investment towards a low carbon, resilient and sustainable future are taken.
- ***Responsible Parties - Producers should have a Voice*** - If producers (i.e., brand holders and persons who market a product to consumers) are held responsible for managing packaging through end of life then they should also be responsible for the design and operation of the program that they are funding (i.e. Full Extended Producer Responsibility). Must also ensure

that cost of non-compliance is not cheaper than compliance. It is not reasonable for brand holders and marketers to pay the full cost of a program over which they have no control. That would equate to a tax for services and would not be consistent with true definition of Extended Producer Responsibility.

- ***Program should strive to minimize recovery system costs, while maximizing recycling rates and the value of recovered materials. The long-term goal is to offset the cost of recovery with the value of the materials recovered. (The PAC NEXT goal since 2011)***
 - This will require a concerted effort to support recycled products through favoured product status for second life materials.
 - Set producer fees that reflect the true costs of sorting, recycling, recovery and disposal.
 - Set performance and recovery targets based upon clear definitions of waste, recovery and recycling with transparent methodologies for calculating performance.
- ***Implement and support Landfill Bans for ALL recyclable packaging as long as local access to recycling is available***
 - Today our recycling rates are still far too low even for materials where we have existing recycling infrastructure e.g., PET bottles, HDPE containers, metal cans, glass
- ***Take an integrated approach to waste management*** - Reduce, Optimize, Reuse, Recycle, Compost, Upcycle, Energy Recovery are all acceptable recovery solutions and should be part of an integrated waste management system.
 - We support energy from waste (EfW) as it offers a better option than landfill to extract calorific value from materials for which there are no current end markets. We accept that EfW is not included as diversion given that there is no opportunity for the package to have a second life. We do support increasing recycling targets over time for all individual materials, set on a material by material basis as a means of encouraging R&D into finding more recycling options in lieu of EfW as a fallback.
 - We support development of composting efforts for certified compostable packaging. This will require alignment on certifications and standards compared to composting technologies and process conditions.
- ***Leverage design guidance tools to implement best practices for new packaging and new materials*** - New Packaging and new packaging materials will continue to be introduced to respond to consumer demands for convenience, portion sizes, shelf life extension (and food waste reduction). Often these packages are environmentally better than others when analyzed from a life cycle assessment perspective thus aligned with the COP21 objectives. A balanced life cycle LCA view should be taken vs an “everything must be recycled” single point of view.
 - Policy should encourage education and outreach to all package designers and decision makers to use industry available guidance tools to deliver best possible recovery outcomes e.g., PAC NEXT Design for Optimization and Decision Tree tools, Consumer Goods Forum Global Packaging Protocol for Sustainability. PACNEXT is helping drive change in its membership, many of whom are stewards. Examples of design considerations that will facilitate greater material recovery can be found in the PACNEXT Top 10 Challenges to Packaging Recycling at a MRF (report can be found via this link http://www.pac.ca/assets/pac-next_top10mrf-finalcompressed.pdf)

- **Require Research and Development programs to support inclusion of new materials into the collection system.** Currently Stewardship Ontario has R&D dollars allocated to help maximize diversion from disposal. This should be supported in any pending regulation.
- **Create Harmonized Recovery Standards** – We recommend that Provincial Interests set a benchmark for National policy regulations for the recovery of packaging materials so that we see harmonization preferably federally, but at a minimum across the province, of the types of materials that are accepted curbside.
- **Continue Harmonized Reporting** - Adoption of a national reporting system (e.g., approach currently offered by the Canadian Stewardships Services Alliance) to reduce administration costs and to improve the accuracy and timeliness of reporting.
- **Standard of Service** – There must be an expectation of a minimum and standardized level of service for all residents in all household types in all municipalities / services entities to improve participation and maximize potential recovery through convenience.
 - Roles and expectations need to be clear between stewards, provincial and municipal governments
 - More data is needed on IC&I waste diversion and generation in order to assess how to best address costs and increase resource recovery in this sector. The approach does not need to be the same as the residential sector.
- **Consumer Communications - Consistent harmonized communications** The plan needs to engage, educate, and inform consumers on the recovery of printed and packaging materials consistently across the province.

We believe that the principles shared here are relevant to the proposed Waste Free Ontario plans and offer the basis for broad collaboration across the packaging value chain.

We would be delighted to discuss these principles and recommendations at your convenience. We would also like to offer our services as a resource in all matters as they relate to packaging design, development, recycling and recovery.

James Downham
President & CEO
PAC, Packaging Consortium

About PAC

PAC, Packaging Consortium is a not-for-profit corporation, founded in 1950. PAC is North American centric with global access. PAC advocates for all materials and for package neutrality through an all-inclusive, transparent and collaborative process. Our 2,200 members come from all sectors of the packaging value chain, from start of life to next life. Our networking process includes PAC webinars, seminars, conferences, competitions, facility tours, education programs, trade shows, technical work groups and social activities. From PAC NEXT, our initiative with a vision of A World Without Packaging Waste, to PAC Food Waste and now with this interest in Blue Events Inc., our industry is on a deliberate path to sustainability.

For further information and media inquiries, please contact James D. Downham, President and CEO, at jdd@leaderlinx.com.