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### COMMENTS ON RECYCLED CONTENT FOR CERTAIN PLASTIC MANUFACTURED ITEMS REGULATIONS

Presentation to Environment and Climate Change Canada





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#### Regarding **Technical issues paper: Recycled content for certain plastic manufactured items Regulations**

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The need to end plastic waste has never been greater. Scientists have found plastic in the deepest parts of the ocean<sup>1 2</sup> in Arctic ice<sup>3</sup> and the desert air.<sup>4 5</sup> It's choking sea turtles and killing seabirds.<sup>6</sup> It's in our beer, our honey, and every fish tested in the Great Lakes.<sup>7 8</sup> And once plastic has been created, it doesn't go away. Instead, it breaks down into micro- and nano-particles that accumulate in the food chain.

Oceana Canada supports Environment and Climate Change Canada's commitment to reduce plastic usage in Canada through the proposed Recycled Content Standards. Recycled Content Standards, if well designed, can contribute to reducing plastic pollution, but must avoid allowing false solutions that undermine the goal of zero plastic waste. The Recycled Content Standards should reduce Canada's dependency on fossil fuel extraction for plastic production and ultimately move Canada towards 100 per cent recycled content in plastic products. The focus of all federal government initiatives to eliminate plastic waste should be to remove non-essential single-use plastic products, approach 100 per cent recycled content in all plastic products, accelerate the shift toward refillable and reusable markets, and ensure mechanical recycling is only recapturing products that have outlasted their consumer lifespan.

<sup>&</sup>lt;sup>1</sup> Goodman AJ et al. 2020. "<u>Benthic marine debris in the Bay of Fundy, eastern Canada: Spatial distribution and categorization using seafloor video footage</u>." Marine Pollution Bulletin. 150.

<sup>&</sup>lt;sup>2</sup> Van Cauwenberghe L et al. 2013. "<u>Microplastic pollution in deep-sea sediments."</u> Environmental Pollution. 182: 495–499.

<sup>&</sup>lt;sup>3</sup> Obbard RW et al. 2014. "<u>Global warming releases microplastic legacy frozen in Arctic Sea ice</u>." Earth's Future. 2 (6): 315-320.

<sup>&</sup>lt;sup>4</sup> Brahney J et al. 2020. "<u>Plastic rain in protected areas of the United States</u>." Science. 12 Jun 2020: Vol. 368, Issue 6496, pp. 1257–1260.

<sup>&</sup>lt;sup>5</sup>Allen S et al. 2019. "<u>Atmospheric transport and deposition of microplastics in a remote mountain catchment</u>." Nature Geoscience. 12, 339–344.

<sup>&</sup>lt;sup>6</sup> Gall SC and Thompson RC. 2015. "<u>The impact of debris on marine life</u>." Marine Pollution Bulletin. 92: 170–179.

<sup>&</sup>lt;sup>7</sup> Campbell D. 2018. "<u>Plastic pollution isn't just a problem in our oceans. It's also affecting the Great Lakes</u>." University of Toronto.

<sup>&</sup>lt;sup>8</sup> Rochman CM et al. 2015. "<u>Anthropogenic debris in seafood: Plastic debris and fibers from textiles in fish and</u> <u>bivavles sold for human consumption</u>." Scientific Reports. 5: 14340.

At present, it is unclear how Canada will meet its ambitious target of zero plastic waste by 2030. Canada's single-use plastic pollution and plastic waste are projected to increase by nearly a third by 2030.<sup>9</sup> Regulations to shift industry and consumer behaviour are needed to reach "peak plastic" usage in Canada and achieve zero plastic waste. At present, it is unclear exactly how Canada will meet its commitment to reach zero plastic waste by 2030.<sup>10</sup>

A mere eight per cent of Canada's waste is recycled<sup>11</sup> and the global rate is only nine per cent.<sup>12</sup> <sup>13</sup> We cannot recycle our way out of the plastic disaster.

In addition to the questions posed in the technical issues paper, Oceana Canada proposes that the government must implement initiatives that will reduce plastic supply and use, and we offer comments on issues for Environment and Climate Change Canada to consider while developing draft regulations on Recycled Content Standards.

To maximize the contribution of these regulations to achieving zero plastic waste by 2030, Oceana recommends the following:

- 1. Prioritize refillables and reusables
- 2. Establish a comprehensive national plastic registry
- 3. Optimize product specifications to increase post-consumer supply

#### PRIORITIZE REFILLABLES AND RESUSABLES

Regulations should prioritize reducing the production of single-use plastic manufactured items and replacing them with reusables and refillables. This is essential to reach the goal of zero plastic waste. Oceana Canada proposes that the majority of funds from the new infrastructure and innovation fund be allocated to supporting the shift to refillables and reusables.

Refillables and reusables offer a practical solution to reducing Canada's single-use plastic waste. Oceana's report *Just one word: refillables* demonstrates that increasing the refillable and reusable market has a high return on reducing plastic pollution. Increases in the refillable and reusable markets by 50 per cent could result in a reduction of plastic pollution by upwards of 83 per cent.<sup>14</sup>

The environmental and financial benefits of refillables have triggered voluntary private sector commitments to increase the percent shares of beverages delivered in returnable or refillable bottles. The Coca-Cola Company recently published its goal to have at least 25 per cent, globally, of all its beverages sold in reusable glass, plastic, or refillable fountain containers by 2030, up

 <sup>&</sup>lt;sup>9</sup> Canada Gazette. 2021. Part I, Volume 155, Number 52: "<u>Single-Use Plastics Prohibition Regulations</u>."
<sup>10</sup> Minister of Environment and Climate Change Mandate Letter. 2021. <u>https://pm.gc.ca/en/mandate-letters/2021/12/16/minister-environment-and-climate-change-mandate-letter</u>

<sup>&</sup>lt;sup>11</sup> Deloitte & Cheminfo Services Inc. 2019. "<u>Economic study of the Canadian plastic industry, markets and waste.</u> Environment and Climate Change Canada."

<sup>&</sup>lt;sup>12</sup> Geyer, R., Jambek, J. R., and Lavender Law, K. 2017. "Production, use and fate of all plastic ever made." Science Advances. Vol. 3. Issue 7. doi: <u>10.1126/sciadv.1700782</u>

<sup>&</sup>lt;sup>13</sup> Statistics Canada. (2019). Materials diverted, by type. <u>Table: 38-10-0034-01</u>.

<sup>&</sup>lt;sup>14</sup> Oceana. 2021. "Just One Word: Refillable."

from 16 per cent in 2020,<sup>15</sup> while PepsiCo has plans to release a time-bound goal.<sup>16</sup> Refillables offer both a practical and proven solution to reducing our plastic waste. Plastic packaging that producers and bottlers can refill with the same product via deposit return programs or at-home refill<sup>17</sup> could count as 100 per cent recycled content.

Oceana Canada proposes that during a phase-in period of the Recycled Content Standards, producers with product lines of refillables could receive a credit of 100 per cent recycled content on products that offer a deposit return program or at-home refillable systems. In this scenario, single-use products avoided would have to be reported annually and be subject to a third-party audit, for the credit to apply the following year. This credit would have the goal of assisting producers who are working to meet Recycled Contend Standards in products across their brand, while increasing their refillable market shares, driving overall plastic usage down.

### ESTABLISH A COMPREHENISVE PLASTIC REGISTRY

Canada does not collect comprehensive data on the import, export, production, manufacturing, and disposal of plastic manufactured items. Inconsistent terminology, voluntary disclosure, and ad-hoc public reporting result in an opaque understanding about plastic consumption and pollution in Canada, and in turn its impact on the environment. Oceana Canada supports Environment and Climate Change Canada's commitment, in the minister's mandate letter, to create a federal plastic registry in order to measure effectiveness on reducing plastic waste via regulations like Recycle Content Standards. The formation of a registry will allow the government to track its progress in achieving zero waste by 2030.

The federal plastic registry should collect the following standardized information on all plastic products from producers, where applicable:

- Resin type
- Import information
- Export information
- Common product name
- Weight produced
- Units produced
- Post-consumer recycled content composition
- Virgin resin content composition

- Recycled content composition measuring technique
- Mixed material composition (e.g., wood, paper, aluminium)
- Chemical composition
- Province or territory
- Manufacturing and/or production facility
- Business to business transfer

Data collected under a plastic manufactured item registry should be subject to third party quality assurance and quality control at the cost of plastic producers.

Reliable data needs to be accessible to the public, therefore an open-access online portal maintained by Environment and Climate Change Canada would be helpful in achieving transparency. Failure to comply with providing accurate data and/or not being able to prove

<sup>&</sup>lt;sup>15</sup> Article: <u>https://www.coca-colacompany.com/news/coca-cola-announces-industry-leading-target-for-reusable-packaging</u>

<sup>&</sup>lt;sup>16</sup> Article: <u>https://www.asyousow.org/press-releases/2022/3/16/pepsi-reduce-single-use-packaging</u>

<sup>&</sup>lt;sup>17</sup> Upstream. 2022. "<u>The reuse policy playbook</u>."

recycled content requirements would then result in those products being prohibited from sale in Canada.<sup>18</sup> Delivery and transparency on data surrounding plastic manufactured items can replicate the National Pollutant Release Inventory (NPRI),<sup>19</sup> following their listing under the List of Toxic Substances.<sup>20</sup> Data collection should start in 2023, with the registry database established by 2024.

### OPTIMIZE PRODUCT SPECIFICATIONS TO INCREASE POST-CONSUMER SUPPLY

Product design variance among plastic manufactured items within product lines often leads to issues with converting recaptured material into usable post-consumer resin. Branding specifications like labelling, adhesives, colouring and attached components (e.g., lids, tear strips) can render a plastic manufactured item ineffective in the mechanical recycling process.<sup>21</sup> In order to optimize recapture and recycling of plastic manufactured items for post-consumer resin and reduce plastic waste in the environment, Environment and Climate Change Canada should work with industry to establish cross/inter industry product design standards for plastic manufactured items such as non-alcoholic ready to drink (NARTD) bottles and containers.

Solutions for product specifications supported by Plastics Pact,<sup>22</sup> including design, colouring, and labelling, can be drawn from the APR Design Guide, and will help increase the effectiveness of recycling and reduce contamination.<sup>23</sup> Oceana Canada proposes Environment and Climate Change Canada establish cross/inter industry product design standards for large producers to eliminate unnecessary recycling contamination.

Oceana Canada's responses to selected questions posed in the technical issues paper:

# 1) Should any product categories be added to or removed from the proposed scope? Please provide rationale.

All plastic manufactured items should be subject to the Recycled Content Standards, including products made primarily of other materials with plastic lining such as: take-away coffee cups, milk containers, take-away food containers, compost bags, and clothing. There should be no items excluded as currently proposed.

<sup>&</sup>lt;sup>18</sup> Ocean Conservancy. 2022. "<u>Recommendations for recycling content requirements for plastic goods and packaging</u>"

<sup>&</sup>lt;sup>19</sup>Government of Canada <u>National Pollutant Release Inventory</u>.

<sup>&</sup>lt;sup>20</sup>List of substances: Canadian Environment Protection Act, 1999.

<sup>&</sup>lt;sup>21</sup> The Ocean Conservancy. 2019. "Plastics Policy Playbook: Design for Circularity."

<sup>&</sup>lt;sup>22</sup> Article: Canadian Plastics. 2022. "<u>U.S. Plastics Pacts calls for elimination of 11 "problematic" packaging products</u> and materials."

<sup>&</sup>lt;sup>23</sup> The Association of Plastic Recyclers, APR Design Guide. <u>https://plasticsrecycling.org/overview</u>

Exemptions for direct contact food packaging should be removed. Like food packaging, water bottles – which are not exempt – contain a product for ingestion and are subject to similar temperature fluctuations and agitation. Food packaging comprises a considerable amount of film packaging<sup>24</sup> that drives Canada's unrecycled waste, making its inclusion in the Recycled Content Standards critical to meet Canada's waste reduction goals. Plastic packaging makes us 33 per cent of end-use markets in Canada<sup>25</sup>, and of that 47 per cent is flexible and 53 per cent is rigid.<sup>26</sup> Plastic packaging therefore creates opportunities to integrate high recycled content in sizable portions of our plastic end-use markets.

In order to achieve zero plastic waste by 2030 and shift to a circular economy that does not require virgin resins entering our supply chains, all plastic manufactured items must be able to contain post-consumer recycled content, be made from an alternative material, or be banned from sale in Canada.

2) Are there other product applications for which the use of recycled content is not feasible or permissible due to legal or other requirements or potential risks for human health or the environment?

Environment and Climate Change Canada must not make exemptions to the Recycled Content Standards unless necessary for the protection of human health. In such instances, the existence of viable alternatives should be considered prior to granting exemptions.

**3)** What actions could government take to facilitate an increase in recycled content for primary food packaging?

There must be bans on all problematic chemicals plus integration of incentives on waste disposal, to achieve higher recycled contented in any type of plastic manufactured item.

Chemical additives in plastic manufactured items present barriers to increasing the recycled content of primary food packaging. In order to ensure an adequate supply of post-consumer resin that can be incorporated as recycled content composition in new products,<sup>27</sup> regulations must eliminate problematic contaminants that render post-consumer resin unusable. International Pollutants Elimination Network (IPEN) found that in major plastic producing and recycling economies, toxic chemicals were found in recycled plastic products like clothing and baby bottles due to their presence in the original plastic manufactured item and lack of removal during recycling.<sup>28</sup> Toxic chemicals found included: perfluoroalkyl and polyfluoroalkyl substances (PFAS), brominated flame retardants (BFRs), and bisphenol A (BPA).

The presence of these chemicals highlights the impacts of contamination, and how strong regulations for recycled products can contribute to improvements in human health. Following

<sup>&</sup>lt;sup>24</sup> Deloitte & Cheminfo Services Inc. 2019. "Economic study of the Canadian plastic industry, markets and waste. Environment and Climate Change Canada."

<sup>&</sup>lt;sup>25</sup> Deloitte & Cheminfo Services Inc. 2019. "Economic study of the Canadian plastic industry, markets and waste. Environment and Climate Change Canada."

<sup>&</sup>lt;sup>26</sup> Canada Plastics Pact. 2021. "Canadian Plastic Packaging Flows."

<sup>&</sup>lt;sup>27</sup> STINA. 2021. "Assessing the State of Food Grade Recycled Resin in Canada & the United States."

<sup>&</sup>lt;sup>28</sup> IPEN. 2022. "<u>How plastics poison the circular economy</u>."

calls to ban these chemicals by the U.S. Plastic Pact,<sup>29</sup> Oceana Canada proposes Environment and Climate Change Canada ban the use of any of these chemicals in all plastic manufactured items.

Extended Producer Responsibility (EPR) guidelines additionally can be leveraged to increase recycled content of plastic manufactured items during a phase-in of Recycled Content Standards. Oceana Canada proposes introducing a bonus-malus system of EPR fees to close the gap between the cost of virgin and recycled resin, which often makes waste collection of the plastic manufactured items uneconomical.<sup>30</sup> A bonus-malus system would put a price on plastic at the producer level for the use of virgin resin and offer breaks on recycled resin to encourage higher recycled content.

EPR credits can be given based on the use of recycled resins in production, to lower the cost of recycled resins and make them more appealing to adopt more quickly. EPR fees can be applied to virgin resins, driving the price of virgin resins up for producers and disincentivizing the use of higher virgin resin content in plastic manufactured items.

Similar to Environment and Climate Change Canada's price on carbon,<sup>31</sup> EPR fees put a price on plastic pollution and if implemented as more than a guideline to the provinces and territories, can provide a backstop to broken waste collection systems and increase the supply of adequate recycled resins for recycled content requirements.

# 4) Should special consideration be given to certain types of reusable plastic packaging? Please provide rationale.

All plastic manufactured items should be subject to Recycled Content Standards.

To incentivize the uptake of refillables and reusables we propose offering credits to producers that provide these kinds of plastic packaging. If a producer can prove it provides reusable plastic packaging that consumers can return for reuse, or delivers at home refill systems for the product of which the purchase was intended,<sup>32</sup> the packaging could be considered 100 per cent recycled content.

Producers who would like the credit would have to demonstrate the effectiveness of their sales on being refillable and reusable, while having the data subject to an audit by an accredited third party and reported annually. The credit for refillables and reusables could be claimed for the previous calendar year of diverted single-use waste and applied to their other products during a phase-in period of Recycled Content Standards.

5) Should certified compostable plastics be exempted from the regulations, either for all or only some product applications, or not? Please provide rationale.

<sup>&</sup>lt;sup>29</sup> U.S. Plastic Pact. 2022. "U.S. Plastics Pact's Problematic and Unnecessary Materials List."

<sup>&</sup>lt;sup>30</sup> The Ocean Conservancy. 2019. "Plastics Policy Playbook: Design for Circularity."

<sup>&</sup>lt;sup>31</sup>Article: Greenhouse Gas Pollution Pricing Act Supreme Court Ruling <u>https://www.scc-csc.ca/case-dossier/cb/2021/38663-38781-39116-eng.aspx</u>

<sup>&</sup>lt;sup>32</sup> Upstream. 2022. "The reuse policy playbook."

To our knowledge, there is no plastic that is considered compostable in systems that are widely accessible to Canadians. In addition, bioplastics or compostable plastics are proven to release micro- and nano-plastics over time that enter the food chain,<sup>33</sup> therefore Oceana Canada recommends there be no exemption allowed.

# 6) Which option for bio-based "drop in" resins, or any alternative option, should be adopted in the regulations, and why? Should consideration be made to allowing only certain types of feedstocks (sources of bio-based resin) for exemptions?

Bio-based plastics should not be considered as an alternative to plastic manufactured items. Biobased plastics (polylactic acid, cellulose, and molded fiber) already pose environmental problems such as particulate release into soil and water, eutrophication of freshwater, acidification, and a large carbon and water footprint.<sup>34</sup> Bio-based plastics behave like petroleum-based plastics, releasing micro- and nano-plastics over time, while not degrading and persisting in the environment. Additionally, they are undisguisable from petroleum-based plastic and confound collection and recycling systems.<sup>35</sup> Further, adequate facilities to break down bioplastics are rare and have large energy footprints.<sup>36</sup> Oceana Canada proposes no exemption be made for biobased plastics.

7) Which option for defining sources of recycled content based on pre-consumer or postconsumer recycled resin, or any alternative option, should be adopted in the regulations, and why?

Only post-consumer resin should be considered as a source of recycled content to reach a 50 per cent content threshold in the drafted regulations. The goal of the Recycled Content Standards is to find purpose for plastics that are considered waste, therefore the regulations should focus on industry repurposing problematic plastics.

### 8) Are there any environmental or technical reasons to consider excluding any particular methods of recycling plastic? Please provide evidence, where possible.

We strongly recommend excluding chemical recycling as a means to achieve Recycled Content Standards. In the technical issues paper, the government of Canada references the use of chemical recycling as an emerging "solution" for certain types of hard-to-recycle plastics, to bring them into a closed loop of plastic waste recapture and new product production. Most U.S. chemical recycling facilities generate hazardous air pollutants, and despite the technology's name, do not result in any recycled plastics.<sup>37 38</sup>

<sup>&</sup>lt;sup>33</sup> Zimmermann, L., Dombrowski A., Völker C., Wagner M., 2020. "<u>Are bioplastics and plant-based materials safer</u> <u>than conventional plastics? In vitro toxicity and chemical composition.</u>" Environment International, Volume 145,106066.

<sup>&</sup>lt;sup>34</sup> Mistry M, Allaway D, Canepa P, and Rivin J. 2018. "<u>Material Attribute: Compostable. How well does it predict the</u> <u>life-cycle environmental impacts of packaging and foodservice ware?</u>" State of Oregon Department of Environmental Quality. Portland, Oregon.

<sup>&</sup>lt;sup>35</sup> Zimmermann, L., Dombrowski A., Völker C., Wagner M., 2020. "<u>Are bioplastics and plant-based materials safer</u> <u>than conventional plastics? In vitro toxicity and chemical composition.</u>" Environment International, Volume 145,106066.

<sup>&</sup>lt;sup>36</sup> Article: Oceana. 2020. "Recycling Myth of the Month: Plant-based bioplastics are not as 'green' as some think."

<sup>&</sup>lt;sup>37</sup> NRCD .2022. "<u>Recycling Lies: Chemical Recycling » of plastics is just greenwashing incineration.</u>"

<sup>&</sup>lt;sup>38</sup> Zero Waste Europe. 2019. "El Dorado of Chemical Recycling, State of play and policy challenges."

Chemical recycling is a broad term used by the chemical industry to refer to a number of waste management techniques including, but not limited to; plastic-to-plastic repolymerization, plastic-to-fuel, or waste-to-energy (incineration).<sup>39</sup>

Plastic-to-plastic repolymerization and plastic-to-fuel use environmentally harmful gasification and pyrolysis as treatment technologies, which produce fuels, ash and residues, greenhouse gas emissions and toxic emissions.<sup>40 41</sup> Often, fuels created as primary products of these processes are sold with the intent to be turned into new plastic products, however, they are ultimately incinerated and no recycling results. This highlights the need for transparent and full lifecycle tracking of plastic manufactured items to be embedded within Recycled Content Standards.

In Canada, already four per cent of plastic resins go directly to incineration, while chemical recycling from diverted waste only accounts for one per cent of recycled resins with uncertainty of the final products.<sup>42</sup> Plastic-to-plastic repolymerization and plastic-to-fuel are unknown to Oceana Canada to exist outside of laboratory settings, with no at-scale application backed by substantial research to disprove negative effects on human and environmental health.<sup>43</sup> Waste-to-energy takes in mixed waste products and uses incineration as a treatment technology, often justified by the argument that the energy generated from incineration contributes to power grids.<sup>44</sup> In Canada, this argument is not justifiable given technology for low-carbon and renewable energy generation is already prevalent throughout the populous portions of the country, and is far preferable to producing energy from plastics incineration, given the harmful byproducts. Incineration and false solutions in recycling techniques have no place in the Recycled Content Standards.

9) Do you agree in principle with allowing the use of a mass balance method for measurement and reporting of recycled content? If not, please explain why.

No, we do not agree with the use of a mass balance method and instead recommend the use of the controlled blending method for measurement and reporting. Controlled blending ensures producers are incorporating recycled resins into products and removes the technical loopholes that the mass balance method provides for continuing business as usual without the integration of recycled resin.<sup>45</sup> Controlled blending keeps virgin and recycled resin separated until the point prior to production and allows the producer to confidently claim that an end product contains a specific and accurate percent of recycled content, whereas mass balance methods cannot make

<sup>&</sup>lt;sup>39</sup> GAIA. 2018. "False solutions to the plastic pollution crisis."

<sup>&</sup>lt;sup>40</sup> GAIA. 2017. "Waste Gasification & Pyrolysis: High Risk, Low Yield Processes for Waste Management."

<sup>&</sup>lt;sup>41</sup> NRCD .2022. "<u>Recycling Lies: Chemical Recycling » of plastics is just greenwashing incineration."</u>

<sup>&</sup>lt;sup>42</sup> Deloitte & Cheminfo Services Inc. 2019. "Economic study of the Canadian plastic industry, markets and waste. Environment and Climate Change Canada."

 <sup>&</sup>lt;sup>43</sup> Article, NRDC : <u>https://www.nrdc.org/experts/daniel-rosenberg/burned-why-waste-incineration-harmful</u>
<sup>44</sup> Rollinson, A. and Oladejo, J. 2019. "<u>Patented blunderings</u>', efficiency awareness, and

<sup>&</sup>lt;u>self-sustainability claims in the pyrolysis energy from waste sector.</u><sup>"</sup> Resources, Conservation and Recycling, 141, pp.233-242.

<sup>&</sup>lt;sup>45</sup> Eunomia. 2021. "<u>A comparative assessment of standards and certification scheme for verifying recycled content</u> in plastic products."

this of claim.<sup>46</sup> It is further tied to a timeline of production and would allow Environment and Climate Change Canada to have more confidence that producers are compliant with Recycled Content Standards while maintaining trust with consumers.

The technical loopholes in the mass balance method favour the use of virgin resin and further drives the price gap between recycled resins and virgin resins, making virgin resin a cheaper and more appealing path for producers. Controlled blending ensures recycled resin content and therefore creates a market for recycled resin, lowering the price for virgin resin<sup>47</sup> by reducing demand.

### CONCLUSION

Environment and Climate Change Canada must develop a clear path to meet its goal of zero plastic waste by 2030 and eliminate unnecessary single-use plastics in Canada. Strong Recycled Content Standards can contribute to this goal.

In summary, Oceana Canada proposes the following recommendations for consideration in the development of the Recycled Content Standards:

- 1. Ban plastic incineration or burning of fuels from so called chemical recycling.
- 2. Prioritize refillables and reusables through the innovation fund and as a credit system for producers.
- 3. Establish a comprehensive national plastics registry by 2024.
- 4. All plastic manufactured items include at least 50 per cent recycled content.
- 5. Adopt the controlled blending method of measurement for recycled resin.
- 6. Establish design standards for plastic manufactured items that are contaminant free and improve the ability to recycle.

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<sup>&</sup>lt;sup>46</sup> Eunomia. 2021. "<u>A comparative assessment of standards and certification scheme for verifying recycled content</u> in plastic products."

<sup>&</sup>lt;sup>47</sup> IHS Markit. 2017. "<u>The economics of PET recycling</u>." Recycling Today.

#### About Oceana Canada

<u>Oceana Canada</u> was established as an independent charity in 2015 and is part of the largest international advocacy group dedicated solely to ocean conservation. Oceana Canada has successfully campaigned to end the shark fin trade, make rebuilding depleted fish populations the law, improve the way fisheries are managed and protect marine habitat. We work with civil society, academics, fishers, Indigenous Peoples and Environment and Climate Change Canada to return Canada's formerly vibrant oceans to health and abundance. By restoring Canada's oceans, we can strengthen our communities, reap greater economic and nutritional benefits and protect our future.