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Feb 17, 2022

The Honourable Steven Guilbeault, P.C., M.P.  
Minister, Environment and Climate Change  
200 boul., Sacré-Coeur  
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Tracey Spack  
Director, Plastics Regulatory Affairs Division  
Environment and Climate Change Canada  
351 Saint-Joseph Blvd.  
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Dear Minister Guilbeault,

**RE: Notice of Objection and Request for Board of Review in relation to the Single-Use Plastics Prohibition Regulations, *Canada Gazette*, Part I, Volume 155, Number 52, 2021-12-25**

**GDI Packaging Solutions Inc. (GDI) is an organization that specializes in bring environmental and cost savings packaging solutions to all major grocery and retail chains in Canada.**

GDI is also a member of the Chemistry Industry Association of Canada's (CIAC) Plastics Division and the Canadian Plastics Pact, which represents Canada's leaders in plastics industry sustainability – a \$35 billion sector that directly employs over 100,000 Canadians.

**GDI Packaging Solutions Inc.**

- formally objects to the Proposed Single-Use Plastics Prohibition Regulations
- requests the establishment of a Board of Review to review the recommendation

**Expansion of the Scope of the Prohibitions Beyond What was Included in October 2020 Consultations, Items Added without Consultation, Scope Creep without Consultation**

- The October 2020 consultation proposed six single-use plastic items be prohibited based on the following criteria: environmentally problematic, recovery problematic, and alternatives exist.
- Those six items were: checkout bags, cutlery, stir stick, straws, ring carriers and foodservice ware.

- No additional consultation prior to including compostable and all extruded polystyrene, vs foamed polystyrene from was consultation
- Compostables:
  - The Regulatory Impact Analysis Statement (RIAS) indicates that compostable plastic single-use versions of the six will also be banned.
  - Rationale for including compostable plastic items not a credible or evidence-based.

### **Plastic Checkout Bags**

- RIAS fails to fully account for the benefits of secondary uses while using a single California study as an analogue to Canadian re-use rates
- Studies prove that a minimum gauge of 2.25 mil allows plastic checkstand bags to meet all the criteria required to be 'reusable' as outlined in the government definition of acceptable bags.
- Canadian studies<sup>1</sup> that show that plastic checkout bags measured at 2.25 mil are not single use and have high re-use and recycle rates.
  - Canadian studies show that 77 per cent of plastic checkout bags are re-used
  - Of the remaining 23 per cent, 15 per cent are recycled and only 8 per cent are not re-used or recycled
  - The net result is that plastic checkout bags have a 92 per cent reuse and recycling rate
  - Provincial Extended Producer Responsibility programs have recycling targets that will lead to improved recycling rates
- 2020 study by Materials Recovery for the Future<sup>2</sup> concluded successful pilot projects demonstrating that flexible plastic packaging can be collected, sorted and baled at a material recovery facility (MRF) through curbside recycling programs
- Many cities in Canada use a bag-in-bag approach to collecting plastic check out bags and "soft plastics", including ring carriers.
- Government has not completed a full analysis of what products are available to replace plastic checkstand bags. Availability of paper and other proposed material is scarce and very costly, adding enormous expense to the consumer.
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Plastic manufactures have been involved with a total circular economy program for the pick up of checkstand bags / store plastics, the recycling of such plastics (in house) and the reprocessing of plastics into new items, for the past 30 years. This ensures these bags do not enter landfill.

- Government needs to understand that the plastic industry has a well proven infrastructure in place now for the recovery, recycling, and reprocessing of plastics.
- The issue of used plastic bags entering oceans and other areas of the environment is a POLLUTION problem.
- Requesting a Board of Review take into account the contribution of each of the technologies above be considered when determining if a plastic manufactured item is recovery problematic.
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#### **Government Actions Requires**

1. Increase funding for the inclusion of plastic bags to be included in municipal curbside pick up programs throughout Canada.  
Note : Once product is picked up and returned to a MURF, the industry can be Responsible to arrange for Recycling and Reprocessing of the plastic material.
2. Lead campaigns to Stop Pollution throughout Canada.

#### **Conclusion**

**The following amendment needs to be added to the definition of “single use plastic checkstand bags.**

1. Implement a minimum gauge requirement of 2.25 mil for the manufacturing of plastic checkstand bags.

Sincerely,

Richard Gubb  
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