



Plastics 46 Eleventh St, Toronto, ON M8V 3G3

January 27, 2022

RE: The proposed Single-Use Plastics Prohibition Regulations, Canada Gazette, Part 1, December 25, 2021. Public Consultation.

The proposed plan for an integrated management approach to plastic products will **not solve Canada's plastic crisis** and it will **exacerbate the climate crisis** because:

- The Government has not taken into consideration the fact that plastic production harms the environment throughout all phases of its production (not just when it becomes waste) ie during extraction, transport, refining, production, distribution, consumption, disposal etc.
- The plastics industry intends to ramp up plastic production to replace the fading oil & gas sector– in the US there are plans to build over 300 petrochemical plants by 2030. It seems that the Federal Government is signalling its support for these types of practises since it proposed to ban only 6 items and focus on a **circular economy** (recycling). This will lead to more plastic production than ever before– in fact the Federal Government proposes that by 2030, manufactured plastic must have a 50% recycled content BUT it is expected that plastic production will triple by 2050 SO in spite of, or because of the government's efforts, we'll increase plastic production by 150%!!!!

Note: "A circular economy is an economic system of closed loops in which raw materials, components and products lose their value as little as possible, renewable energy sources are used and systems thinking is at the core".

And consider the following explanation of what happens to plastic during the recycling process: "Plastic molecules are long and flexible, and they change structurally when subjected to thermal and mechanical stress during melting and extrusion. ... This type of degradation is called "heat history" in the plastics recycling trade. The deterioration accumulates with each reprocessing and is irreversible."

Also consider that: "The same piece of plastic can only be recycled about 2-3 times before it degrades to the point beyond usability. Even if it were to be used for the same purpose, it would be combined with virgin resin to improve its quality."

Clearly, plastic cannot be included in a circular economy since it loses its value every time it is recycled and can be recycled only a very few times; therefore

- The government must end fossil fuel subsidies, not support them by allowing them to transition into more plastic production.
- As to recycling- it doesn't work in part because it's cheaper to use virgin feedstock; while a mere 9% of plastic actually gets recycled in Canada, the remainder is permanent non-biodegradable toxic waste on our lands and in our waters, or in our air as toxic air pollution through incineration.
- How will the government prevent plastic coming from and going to other countries?
- The health and environmental issues plastic creates cost more than the recycling industry makes.
- There is no way to make plastic sustainable; as it is designed to last forever, it ends up in landfills, damages land and water ecosystems, is a toxin ingested by wildlife, and is passed on to human digestive tracts when we eat fish etc.

It is taking the government too long to implement its plastic reduction strategy. We need a plan to come into effect no later than 2022. Outright bans are the only way to change behaviour but the proposed list of banned items is terribly insufficient. Styrofoam must be included as one of the items in the first round of bans. We don't need to be manufacturing more plastic. There are non-plastic alternatives for most plastic items.

“The only way to stop plastic from overwhelming our oceans, polluting our land and making the world a worse place is to shut the system, the entire system down”.

Sincerely,

StopPlastics

PS This letter follows email sent January 27, 2022