

Tracey Spack, Director  
Plastics Regulatory Affairs Division  
351 Boulevard Saint-Joseph  
Gatineau QC K1A 0H3

Dear Ms. Spack:

I am writing on behalf of [BurlingtonGreen](#) (BG), a community-driven, non-partisan, registered charity. Through awareness, advocacy and action initiatives, we work with all sectors to protect the environment, mitigate climate change and to create a healthier, more environmentally responsible Burlington.

While our focus is primarily local, we do review and provide commentary on government policy documents and decisions that can affect environmental outcomes in Burlington. Reducing the amount of plastic in our consumer and waste streams is an important priority for us. Since 2011, BurlingtonGreen has championed local efforts to clean up our city and rid it of unsightly, polluting litter waste, including a great deal of plastic. Through our yearly Clean Up program, **more than 121,000 participants** have joined this collective effort resulting in cleaner parks, streams, schoolyards and neighbourhoods. As well, in June of 2019, we initiated a petition which was signed by 1667 people asking Burlington to ban single use plastic shopping bags. Since then, we have been pleased to see the federal government outlaw these plastic polluters, effective at the end of this year. Also encouraging is that a number of retailers have already stopped providing them, in anticipation of this deadline.

We strongly believe that it is past time for us to significantly reduce the volume of single use plastic used in food packaging and support the implementation of a Pollution Prevention Plan to achieve this goal. The country's biggest – and very profitable – grocery chains must be held accountable to reduce the pollution caused by single-use plastic food packaging. The grocery stores must not use the excuse of cost to avoid making necessary changes to their packaging systems for sustainability. They must also acknowledge that plastic packaging can lead to food waste and that there is no blanket reason for requiring single-use plastic packaging to prevent it.

We join with other ENGOs in support of the recommendations made by [Environmental Defence Canada](#) to ensure that the final Plan is truly robust, comprehensive, and structured to effectively reduce the use of plastic food packaging and where it cannot be eliminated outright, contains reporting measures and metrics to ensure that re-use and recyclability strategies are being implemented by grocers and their supply chains in a timely fashion.

The grocery chain Plans must therefore prioritize:

- Elimination of packaging altogether where possible (especially for fruits and vegetables)
- Convenient and efficient systems for reuse/refill of packaging and containers, particularly “prefilled” products in which containers are returned to the retailer by consumers for refilling prior to being put back on the shelf.

Numerous studies confirm that reuse is the most effective way to reduce waste, water use, greenhouse gas emissions and material use as long as there is an effective system that ensures containers are reused many times. Grocery chain Plans must be required to outline how they will ensure reusable packaging stays in circulation and is reused many times. This includes setting targets for return of reusable packaging for refilling, which ensures that systems are set up to get containers back. The chains must

also be required to report annually on return rates for refillable packaging and how many times each package is refilled.

Grocery chains must be required and supported to explore common packaging and return systems for high-volume packaged food products to ensure convenient and effective reuse options for the products that are sold the most. They must also make reuse/refill options available in all of their stores to ensure widespread access.

Any new packaging adopted under a Plan must be free of PFAS, phthalates, bisphenols, fluorinated polymers, brominated flame retardants, chlorinated paraffins, and benzotriazole UV stabilizers. All of these chemicals pose a threat to the environment and human health and should not be used in packaging.

Grocery chain reporting must be robust and publicly-accessible to ensure that people living in Canada are able to review progress on plan implementation and outcomes on an annual basis. Any requests for time extensions or waivers must be made public, as well as the decision on such a request. Further, “non-confidential information” that will be made available to the public must be defined in the broadest possible sense to ensure that the public has the ability to assess progress on the Plans. A lack of transparency would result in a loss of credibility for the Plans.

Business-to-business packaging should also be subject to reporting requirements, given the lack of reliable data on business packaging, on how much single-use packaging they receive from other businesses and any measures taken to eliminate this packaging. This data should be used to identify regulatory and policy tools to eliminate single-use packaging from grocery supply chains as well as possibilities for introducing reusable business-to-business packaging systems.

Our organization also does a lot of work along Burlington Beach where we have recently ramped up community participation in searching for nurdles in the sand. These microplastics have become a significant issue in our waterways and more regulation and accountability is needed for producers that use these nurdles in their packaging manufacturing process.

The Plans must not deter the government from proceeding as soon as possible to ban harmful and unnecessary single-use plastics, including all takeout containers, bags other than reusable checkout bags, produce stickers, polystyrene and polyvinyl chloride packaging, and films and pouches. Where the plans do not prove effective at further reducing plastic packaging waste, the government should ban additional single-use plastic packaging prior to 2030.

Interim target dates proposed in the consultation document – 2026, 2028 and 2030 – should be accompanied by a public report from Environment and Climate Change Canada assessing the impact of Plan implementation on elimination of plastic packaging waste and pollution. If the assessments show limited results, regulation – including additional bans on harmful single-use plastic packaging – must be implemented.

In conclusion, it is urgent that Canada implement a single use plastics reduction strategy across all sectors as soon as possible, and tackling the food industry will be part of the bigger picture. In addition to taxing our waste streams and polluting our wider environment, plastics, which are manufactured from fossil fuels, are adding to the country’s continued extraction of oil. Given that to keep warming to 1.5 degrees, we must keep 60% of oil reserves in the ground, every effort to reduce extraction must be

made. There will likely be a need for plastic for the foreseeable future. It is now ubiquitously used in many applications, from medical devices to car making, in appliances of all types, and many more, and will continue to be, unless we find another material that can be used for some of these applications. It therefore behooves us to immediately reduce our reliance on it where we can. Reducing plastic food packaging represents the next logical opportunity to achieve this.

BurlingtonGreen appreciates the opportunity to comment on the draft Plastics Pollution Prevention Plan for the grocery industry, and we urge Climate Change and Environment Canada to proceed without delay to strengthen the draft P2 Notice to grocers along the lines of the above recommendations.

We must ensure that this industry, and as a consequence, consumers, do their part to not only reduce plastic pollution and ease the strain on our waste collection systems but also to reduce demand for high emission fossil fuel extraction as well.

Respectfully,

A handwritten signature in black ink that reads "Amy Schnurr". The signature is written in a cursive, flowing style.

Amy Schnurr  
Executive Director  
BurlingtonGreen Environmental Association  
[www.burlingtongreen.org](http://www.burlingtongreen.org)