

Guidance for Selecting Alternatives to the Single-Use Plastics

in the Proposed *Single-Use Plastics
Prohibition Regulations*



EC21233.01

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PURPOSE

On December 25, 2021, the Government of Canada published the proposed *Single-use Plastics Prohibition Regulations* (the “proposed Regulations”), which identify six categories of single-use plastic items (plastic checkout bags, cutlery, foodservice ware made from problematic plastics, ring carriers, stir sticks and straws) and outline rules that would prohibit or restrict their manufacture, import and sale in Canada. To help businesses transition away from these products, the Government of Canada has developed this proposed guidance document outlining important considerations businesses can take into account when making decisions on alternative products or systems that prevent pollution and help Canada transition to a circular economy.

BACKGROUND

The Government of Canada is taking ambitious action to reduce plastic pollution through a comprehensive approach that addresses the entire lifecycle of plastics. This approach seeks to transition Canada away from a linear economy that disposes of plastic as waste, and towards a circular economy that keeps plastic in the economy and out of the environment through activities such as better product design and higher rates of reuse, repair, remanufacture, refurbishment, and recycling.

The proposed Regulations are one part of this broader approach, and would be enacted using authorities provided by the *Canadian Environmental Protection Act, 1999*, which is an essential federal tool for preventing plastic pollution and supporting the move to a circular economy. The proposed Regulations would prevent plastic pollution that causes harm to wildlife by prohibiting or restricting single-use plastics that are prevalent in the environment. The Government consulted widely to seek input to inform the development of the proposed Regulations, and heard that businesses needed guidance on switching to available alternative products and systems.

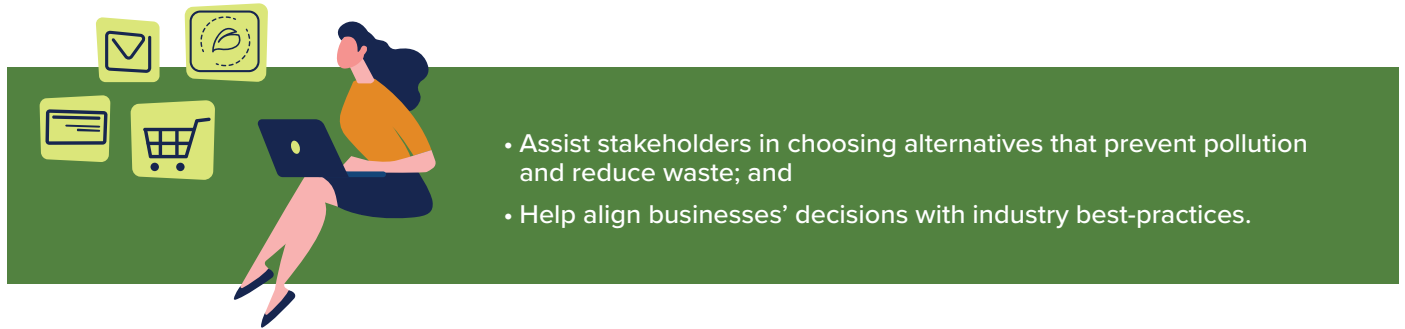
AUDIENCE

The Government has developed this guidance for businesses and organizations that are providing single-use plastics to the Canadian market or to the public. This would include, among others, manufacturers, importers, distributors and retailers of single-use plastic items, as well as businesses, like restaurants and other organizations that provide single-use plastics to the public to eat, drink or carry their purchases.



HOW TO USE THIS DOCUMENT

This Guidance Document reflects best practices for choosing less-impactful plastics or non-plastic alternatives to the six categories of single-use plastic items identified in the proposed Regulations. Following the principles outlined in this document will:



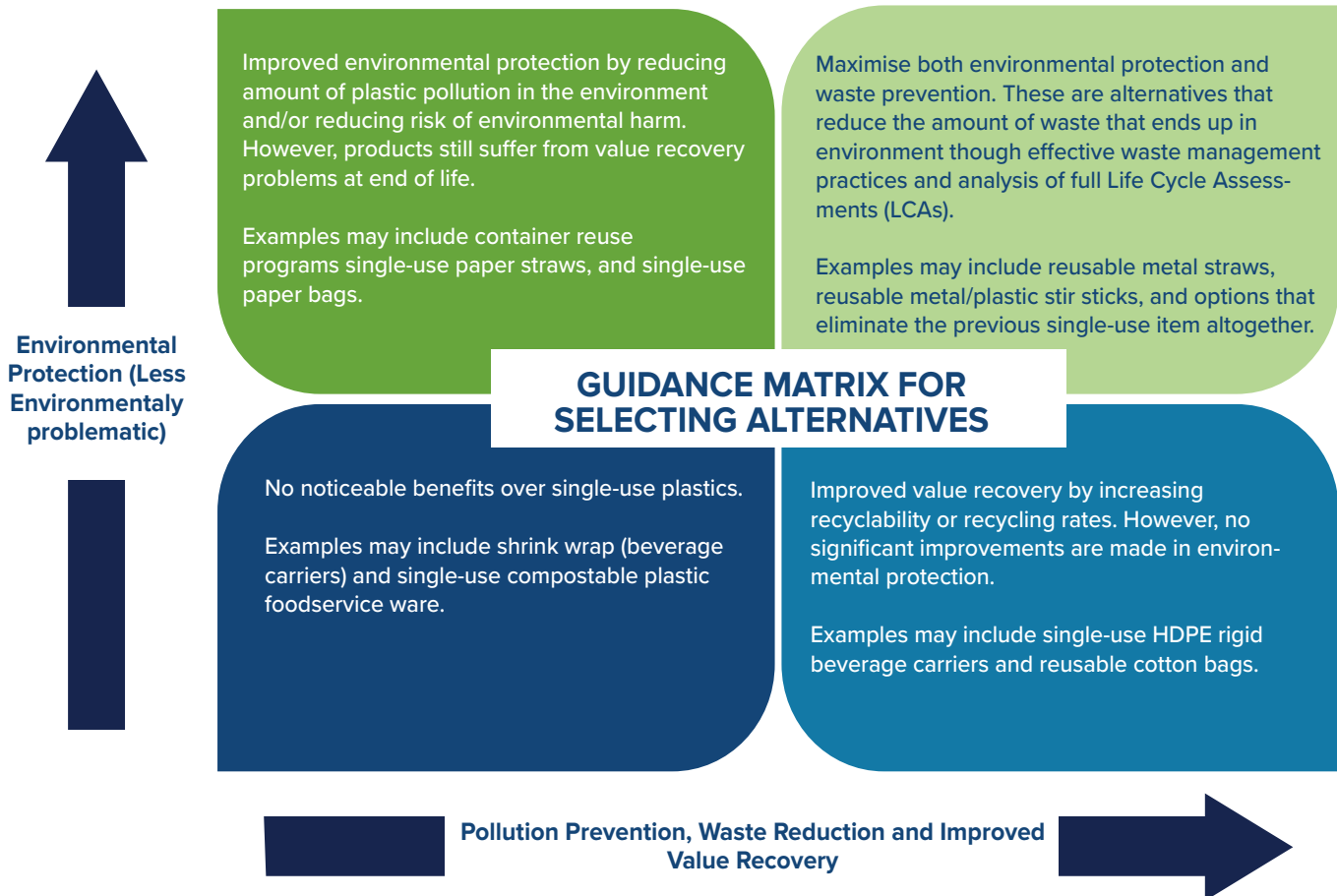
THE MANAGEMENT FRAMEWORK FOR SINGLE-USE PLASTICS

The Government has developed a Management Framework for Single-use Plastics as part of an integrated management approach to plastic products to prevent waste and pollution. The Framework outlines three steps the Government follows in evaluating the environmental impact of a single-use plastic in order to choose appropriate measures to manage those impacts. The first step involves categorizing single-use plastics that are environmentally problematic, value recovery problematic, or both, according to the following criteria:

Category	Criteria
Environmentally problematic	<ul style="list-style-type: none"> • Prevalent in natural and/or urban environments, according to citizen science, civil society or municipal litter audit data • Known or suspected to cause environmental harm (for example, ingestion by wildlife or entanglement risk to wildlife, etc.)
Value-recovery problematic	<ul style="list-style-type: none"> • Hampers recycling systems or wastewater treatment (nutrient or additive contamination, material or size/shape incompatible with recycling technology, etc.) • Low to very low recycling rate (lower than average recycling rate for packaging, from 0-22%) • Barriers to increasing their recycling rate exist

The following Guidance Matrix is provided to help businesses situate potential alternatives across these categories:

Figure 1: Decision Matrix to Guide the Selection of Alternatives

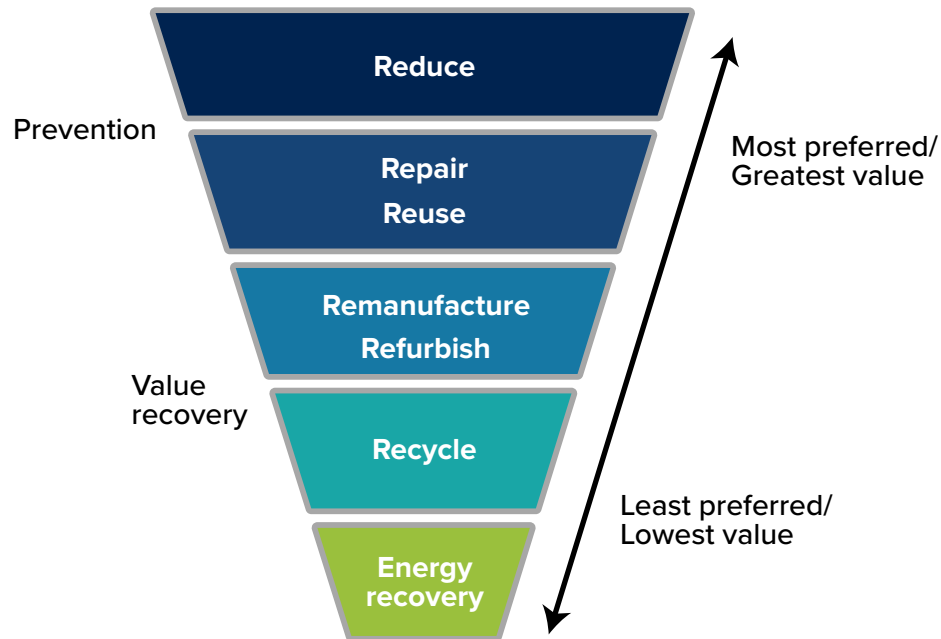


APPLYING THE WASTE MANAGEMENT HIERARCHY IN DECISION-MAKING

The waste management hierarchy illustrates methods to reduce plastic waste and pollution in order of preference. While recycling often gets a lot of attention, the hierarchy shows that reducing and reusing products are preferable to effectively reduce plastic pollution. This hierarchy is endorsed by the Canadian Council of Ministers of the Environment in its 2018 *Strategy on Zero-Plastic Waste* (see Figure 2), and is a useful tool for ranking the potential outcome of a particular product or system that could replace single-use plastics. For example, a reusable alternative is preferable to a recyclable alternative, while reducing consumption of single use products is yet a better option.

It is recommended that stakeholders evaluate opportunities to eliminate unnecessary plastic products in their businesses. Where a plastic product performs an essential function, businesses and organizations should investigate opportunities to choose or redesign products in a way that reduces the amount of plastic waste at their end of life.

Figure 2: Waste Management Hierarchy



Preventing pollution by reducing plastics

The best form of pollution prevention is through reduction, which means reducing reliance on products that create the waste that leads to pollution in the first place. Businesses may first wish to consider whether a single-use plastic needs to be replaced at all, or whether that product or service can be eliminated. For example, businesses can evaluate products for redundant or unnecessary packaging that can be eliminated without affecting quality.

Reducing plastics by replacing them with non-plastic equivalents may be an option for products with essential functions. In the case of single-use plastic cutlery, stir sticks and straws, options exist that are made from a range of non-plastic materials, such as wood, paper and moulded pulp fibre. When evaluating a replacement, it is important to consider available information on the impacts of the product throughout its lifecycle.

Preventing pollution through reuse

Redesigning products and services to provide reusable options is one way to reduce the need for single-use products that will end up in the waste stream. Choosing reusable products and packaging means less waste and pollution. As noted in the Regulatory Impact Analysis Statement that accompanies the proposed Regulations, lifecycle analysis studies indicate that reusable or refillable containers often have higher upstream environmental impacts when compared to single-use items, but when used multiple times, these effects are reduced significantly, resulting in a lower impact per item.

Refillable container programs are another reuse option that businesses can investigate. Scout Environmental's publication, [How to Start and Run a Bulk-Reuse Refillery](#), is an example.

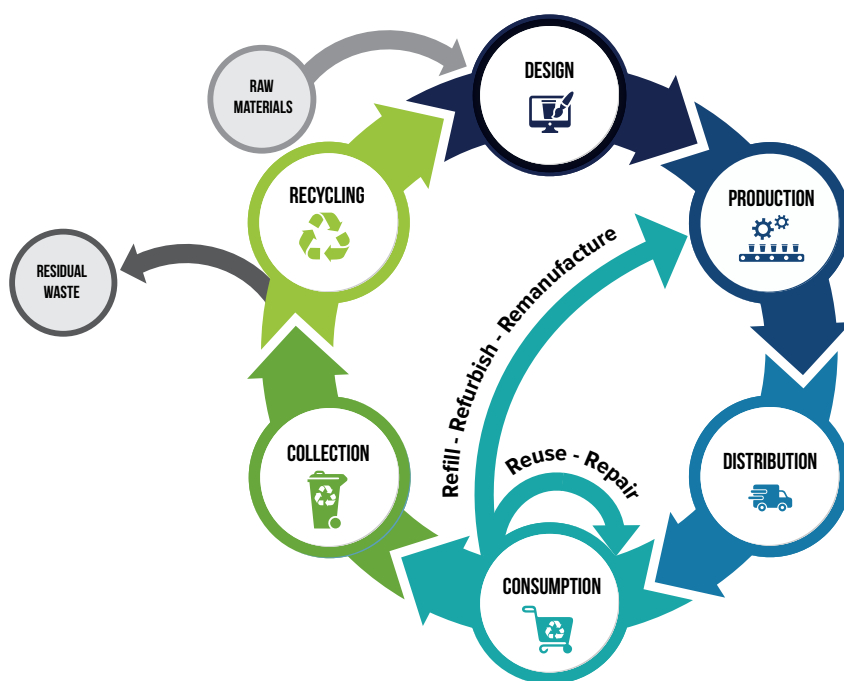
Preventing pollution by facilitating value recovery of plastics

Some of the single-use plastics subject to the proposed Regulations have alternatives that are also single-use and made from plastic. For example, single-use plastic foodservice ware made from problematic plastics could be replaced by a more recyclable alternative, such as containers made from polyethylene, terephthalate or polypropylene.

Using the waste management hierarchy, products and packaging whose only post-use option is value recovery are less favourable to those that can be reused and value recovery options for single-use plastics are limited. Remanufacturing and refurbishing are unlikely to be applicable for single-use products because they are not designed for durability; therefore, in most cases, value recovery for these items would be limited to recycling. Businesses are encouraged to consult local recycling and composting facilities to ensure that any replacement products can be properly managed at its end-of-life.

CONSIDERATIONS FOR ALTERNATIVE SINGLE-USE PLASTICS

Figure 3: Circular Economy for Plastics



External guidance on preferred plastic materials

Organizations from industry, government and elsewhere have developed guidance documents that provide useful tools for stakeholders to review when choosing alternatives and assessing the impact of the plastic in their products. The Canadian Council of Ministers of the Environment has committed to developing a reference compendium of existing guidelines for recyclability and recommendations for use by jurisdictions and industry. This compendium is scheduled to be released in 2022. Businesses are encouraged to consult this document when it is released for a list of useful guidelines to help inform their decision-making.

However, it is important to note that recycling capability can vary significantly by region, and communicating with local recycling facilities can help ensure products will be successfully processed when they reach their end-of-life. In addition to the environmental impacts of plastic, when it is disposed of in a landfill, or littered, it represents a lost resource in a circular economy (see Figure 3).

GUIDANCE SPECIFIC TO EACH SINGLE-USE PLASTIC SUBJECT TO THE PROPOSED REGULATIONS

Single-Use Plastic Bags

Alternatives to single-use plastic bags have become commonplace in Canada. Some large retailers have already eliminated single-use plastic bags entirely. Reusable shopping bags and bins are now commonly used by consumers to carry purchased goods. A recent Statistics Canada survey found that 96% of Canadian households use their own bags or containers while grocery shopping. Of those that use their own bags or containers, 43% always did, 36% often did, and 16% sometimes did. Meanwhile, only 4% of Canadians did not own or use their bags or containers when grocery shopping¹. However, reusable bags and bins must be reused several times to maintain an advantage over single-use plastic bags.

Some consumers have raised concerns about the cleanliness of reusable bags. Advertising and consumer education about the importance of washing reusable bags, especially after being used for non-grocery purposes, is likely to help encourage their continued use.

Some companies are already prepared to leave single-use bags behind. Costco stores do not provide bags of any sort, encouraging customers to reuse their boxes or bring their own. In July 2019, Sobeys announced it would eliminate plastic checkout bags from all locations, removing 225 million plastic bags from circulation each year. Paper and various types of reusable bags are available to consumers for a modest fee.

Single-Use Plastic Cutlery

Single-use plastic cutlery is primarily associated with takeout meals. However, when a consumer consumes a takeout meal at their residence, single-use cutlery is not required, or often even desired, by the consumer. Businesses should consider giving consumers the option to specify whether they require single-use cutlery at all. Businesses could also consider providing more meal options that do not require the use of cutlery (e.g., wraps and sandwiches). When single-use cutlery is required, alternative materials are available (e.g., pressed and moulded fibre, wood). Charging consumers a fee for single-use cutlery may also discourage their use.

Foodservice Ware made from or containing problematic plastics

Loop is a company that is testing a deposit and refund system for several grocery items. The products are delivered in durable, returnable packaging that can be collected, cleaned and reused.

In Quebec, the grocery chain Metro allows customers to bring their own re-sealable containers to package items from the deli, ready-to-eat, meat, fish and seafood and pastry counters.

In the proposed Regulations, foodservice ware made from or containing problematic plastics are identified as takeout containers and lids, cups, bowls and plates, made from foamed plastics, black plastic made with carbon black, polyvinyl chloride (PVC) and oxo-degradable plastics. Encouraging consumers to bring their own containers or developing a deposit and refund system for reusable containers are options that would reduce the amount of single-use plastic food packaging and foodservice ware. Another option is to engage with local recycling facilities to determine which plastics are recyclable thereby reducing the amount sent to landfill. It is important to remember that in some areas, the company collecting products for recycling and the company responsible for the recycling process are not the same. Businesses should therefore verify that their products will actually be recycled, and not just collected for recycling only to be discarded later.

¹ Statistics Canada. [Table 38-10-0144-01 Single-use plastics](#)

In Canada, the E6PR (Eco Six Pack Ring) is made of natural fiber and is available to provide the same function as single-use plastic ring carriers. The E6PR product is made of natural fiber.

Single-Use Plastic Ring Carriers

Single-use plastic ring carriers are unique among the list of single-use plastic products proposed for a ban or restriction because they are often applied to products before arriving at retail locations. Alternative products can already be found on the Canadian market, and include cardboard boxes, rigid plastic or fiber beverage carriers, or adhesives that hold beverage containers together. When choosing an alternative to single-use plastic, businesses should try to avoid value recovery problematic options, like plastic film, as these can be difficult to recycle.

Single-Use Plastic Stir Sticks

In some cases, the need for stir sticks can be eliminated by redesigning how beverages are served, for example, some drinks can be premixed and stirred before reaching the consumer. Where their use cannot be eliminated, several alternatives to single-use plastic stir sticks are already available and in use in the Canadian market. The principal reusable alternative is a metal spoon and a number of single-use alternatives made of natural materials, such as wood, are also available.

Tim Horton's has already phased out plastic stir sticks in favour of wood-based stir sticks in their restaurants in Canada and the USA. This change is expected to eliminate 186 million plastic stir sticks.

Single-Use Plastic Straws

In many situations, eliminating all single-use straws is the simplest option. Most consumers do not require a straw to consume a beverage while seated at a table. Furthermore, some companies have designed lids that make it easier to consume a beverage without a straw and some restaurants and food vendors have reduced their usage of straws by only providing them on request.

Reusable straws made from metal, glass and silicone are available for Canadians to purchase. For consumers who want to continue to use a straw to consume a beverage, single-use non-plastic straws (e.g., made from paper) are a viable option.

Starbucks and Tim Hortons have recently introduced "strawless" lids for cold drinks, allowing consumers to consume cold drinks without a straw. Other restaurants, like A&W, have already made the switch from plastic straws to paper straws.

The proposed Regulations will continue to allow Canadians to buy packages of multiple single-use plastic flexible straws in retail stores if they are kept out of public view and offered on request. The intent is to ensure that persons with certain disabilities who require a single-use plastic flexible straw will continue to have access at home and can carry them to restaurants and other premises. Hospitals, long-term care facilities and other care institutions will also have continued access to single-use plastic flexible straws to provide to patients or residents who require them.