

Hi-Cone Submission

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.

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To:

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Submitted via email: ec.plastiques-plastics.ec@ec.gc.ca

Introduction:

Hi-Cone welcomes the opportunity to respond to the Government of Canada's proposed Single-Use Plastics Prohibition Regulations (hereafter referred to as the "regulations") published on December 25, 2021 in Canada Gazette, Part I, Volume 155, Number 52.

Hi-Cone is a division of Illinois Tool Works Inc. (ITW) and is the primary manufacturer of multipack plastic ring carriers for the Non-Alcoholic Ready to Drink (NARTD) and beer industries globally. Hi-Cone has been committed to providing the beverage industry with sustainable multipack solutions since its founding in 1961. More broadly, ITW is a global manufacturer of products, components and services that support a wide array of consumer, commercial and industrial end uses across 56 countries. In Canada, the company has several manufacturing operations representing over \$240 million in annual revenue (2019) due to the hard work of almost 600 Canadian employees.

Hi-Cone formally objects to the proposed regulations and requests the establishment of a Board Review under section 333 of CEPA to review the recommendation for the reasons below.

Increase in Plastic Waste and Litter:

The Canadian government is committed to the Strategy for Zero Plastic Waste, however, the regulation to ban ring carriers concedes that it will **increase plastic usage, waste and litter** from the alternatives suggested. According to Table 10 in the regulations, in ten years, more than **8000 additional tonnes** of plastic waste will be generated from alternative solutions if ring carriers are banned. Additionally, Table 11 in the regulations shows that there will be an **increase in plastic litter of 9 tonnes**, including an increase in marine plastic pollution. It is, therefore, clear – using the ECCC's own assessment data – that banning ring carriers does not support Canada's goals to achieve zero plastic waste and reduce their impact on the environment. Rather, it will increase plastic waste and litter, putting the environment at greater risk.

Lack of Litter and Entanglement Data:

According to the regulations, ring carriers are “a common form of litter and are recognized as posing a threat of entanglement for wildlife such as seabirds.” However, these regulations and previous documents, including the [Science Assessment of Plastic Pollution](#) (the Science Assessment) and [A proposed integrated management approach to plastic products to prevent waste and pollution](#) (the Discussion Paper) fail to provide data to support these claims. Ring carriers are stated to be “common,” however in the data provided, ring carriers are **6.6 to 45.6 times less common** than the other five proposed items. Table 1 shows annual litter data for Canada from the TIDES database from 2016-2021, where ring carriers are less than 0.5% of all litter collected, confirming ring carriers are **not** a common form of litter.

Table 1: Annual Canada Litter Data from TIDES (www.coastalcleanup.org)

| Year | 2021 | 2020 | 2019 | 2018 | 2017 | 2016 |
|--|--------|--------|---------|--------|--------|--------|
| Six-Pack Rings (ring carriers) | 1932 | 572 | 1630 | 1632 | 726 | 1119 |
| Total Items (not including small pieces) | 419123 | 219910 | 1163293 | 935038 | 313530 | 411826 |
| % of Six-Pack Rings | 0.46% | 0.26% | 0.14% | 0.17% | 0.23% | 0.27% |
| Entanglements from Ring Carriers | 0 | n/a | 0 | n/a | 0 | 0 |

Additionally, the regulations and supporting documents fail to provide data supporting the assertion that ring carriers are an entanglement threat to wildlife. Hi-Cone takes animal entanglement very seriously, and there have been no recordings of animal entanglement due to ring carriers in Canada since the TIDES database started in 2015 (see Table 1).

Greater Environmental Impact from Alternatives:

Ring carrier alternatives have significantly higher negative environmental effects, especially for the climate change, air quality and water quantity categories. According to third party data from Franklin Associates, the four suggested alternatives (LDPE shrink film, rigid recyclable plastic, fiber board, and paper board) use more energy to produce, are heavier, use more water, create more waste, and have higher GHG emissions throughout their lifecycle when compared to Hi-Cone ring carriers. The regulations currently underplay the negative consequences associated with the suggested alternatives, misleading the Canadian public on the true environmental cost of banning ring carriers.

Lack of Acknowledgment of Current Recycling Infrastructure:

The regulations assert that a viable alternative for ring carriers is single-use low-density polyethylene (LDPE) shrink wrap. Given the criteria provided in the regulations, especially around recyclability, ring carriers (also made of LDPE) and shrink wrap have **equal recyclability** because they are the same material and interact in similar ways with Material Recovery Facility (MRF) sorting equipment. Both items are lightweight, flexible film and can be sorted into the same bales as checkout bags, which according to the regulations are “accepted in several recycling programs across Canada.”

In addition to the ability to be accepted into curbside programs along with all other flexible LDPE film, Hi-Cone has established two other recycling pathways for ring carriers, to expand the recycling access to consumers who do not have access to flexible film curbside recycling. Consumers can return ring carriers to all [Beer Store](#) locations and via mail through Hi-Cone’s RingRecycleMe© program. For many years,

Canadian consumers have returned ring carriers to the [Beer Store](#) as a part of their packaging return operations. Additionally, in 2020 Hi-Cone started the RingRecycleMe Program to expand recycling access, paying for shipping of ring carriers to our recycler and PCR supplier, ensuring the carriers are a part of the circular economy. Whether through curbside, store drop-off, or mail-in programs, all Canadian consumers have access to ring carrier recycling.

Conclusion:

A ban on ring carriers is the wrong approach to achieving a Canada with zero plastic waste. Ring Carriers are not a commonly littered item, do not cause harm to animals, have the lowest GHG emissions for similar multipackaging technologies, and are 100% recyclable in flexible film LDPE streams. Hi-Cone is committed to creating a circular economy for our consumers globally through use of recycled material and investment in recycling infrastructure. A ban on ring carriers would cost Canadians more, both monetarily and environmentally, limit the transition to a circular economy, and impede their ability to achieve zero plastic waste.