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February 14, 2022

The Honourable Steven Guilbeault, P.C., M.P.
Minister, Environment and Climate Change
c/o Tracey Spack
Director
Plastics Regulatory Affairs Division
Environment and Climate Change Canada
351 Saint-Joseph Boulevard
Gatineau, Quebec
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ec.plastiques-plastics.ec@ec.gc.ca

Dear Minister Guilbeault,

Re: Notice of Objection - Canada Gazette Part 1, Vol 155, No. 52 – Single Use Plastics Prohibition Regulations – December 25, 2021

Inteplast Bags and Films Corporation, with plants in Delta, British Columbia and Saint John, New Brunswick has been manufacturing plastic film bags for North American retailers, grocers and their consumers for approximately 40 years. We have operated for many years with sustainability targets both internally, in terms specified manufacturing protocols as well as externally, for example engaging in select market circular recycling programs. We enthusiastically share in the salutary goals of protecting the climate and preserving the environment. Nonetheless, we respectfully file this notice of objection on the basis of the reasons set forth below, and respectfully request that a board of review be established under section 333 of the Canadian Environmental Protection Act, 1999.

Our observations of proposed regulations are these:

- The definition of reusable bags is currently unclear and ambiguous
- The impact on Canadian manufacturers is neither minor, nor as simple as machine re-calibration, but rather will have a significant impact on capital

- expenditure, anticipated lost revenues and potential job loss
- The monetized and environmental cost and availability of paper and/or other plastic based alternatives is understated
- The savings to landfills are overstated as the expected reuse of bags is anticipated to be far less than the suggested 100 times
- The expected gravitation toward non-woven, woven and other heavier gauge or recycled plastic based alternatives as opposed to paper, will result in savings to landfills being overstated
- There is no known formal or uniform structure for recycling plastic based (poly non-woven, etc.) reusable bags on a national or provincial level and this may be unlikely to change given that these activities are currently conducted off-shore
- The implementation of the proposed regulations will have an overall negative impact on the environment

Specifically, as it relates to single use plastic bags, we contend the definition falls short in that:

- It does not include heavier gauge, durable and economically favorable plastic film reusable bags, currently being used successfully in other North American markets
- While there is noted consultation with the State of California to inform development of performance thresholds for SUP checkout bags, the California model of defining reusable plastic film bags with a thickness of 2.25-MIL was not included (nor appear to have been analyzed in the S.E.A.)
- The definition for laundering instructions for linen and cotton, is improper as the use of reusable bags is commonly expected to be plastic based (poly non-woven, woven, PET, polyester)

Further, accreditation of reusable bags in Canada is not widely known or understood.

Therefore, we request a narrower definition of single use plastic bags to include:

- Made from plastic film, with a thickness of less than 2.25-MIL
- Will break or tear if used to carry 10 kg, 53m, 100 times
- Will break or tear if laundered in cold water using a gentle cycle, or wiped cleaned

In addition, to avoid current market confusion we request that further details be provided regarding:

- Recycling infrastructure for non-paper alternatives, specifically poly non-woven, woven, polyester and/or other plastic based substitutes
- A list of accredited laboratories and defined physical characteristic specifications for testing purposes for reusable bags

We thank you for your review and consideration and look forward to your response.

With best regards,

A handwritten signature in black ink that reads "Janine Paley". The script is fluid and cursive, with the first letters of each word being capitalized and prominent.

Janine Paley
Senior Executive Manager