

Submission on Preventing Plastic and Single-Use Waste in B.C.

Introduction

As the voice of tourism for the province, the Tourism Industry Association of British Columbia (TIABC) advocates for the best interests of our members and stakeholders, particularly on issues such as government policies and regulations that impact operators. On behalf of our members and stakeholders, we respectfully submit the tourism industry's views on Preventing Plastic and Single-Use Waste in British Columbia.

Consultation Questions:

1. Checkout Bags

a. How will the proposed provincewide ban on plastic checkout bags, and fees on paper and new reusable checkout bags, affect your business or the businesses/organization you represent?

- The ban on plastic checkout bags may not be widely known or understood by tourists to British Columbia. Therefore, a grace period for tourism businesses to fully adopt the ban may be necessary to allow for sufficient time to communicate the new operating environment and allow visitors to adjust accordingly.
- It is our belief that the costs of paper or reusable bags will not be a deterrent for visitors but rather an irritant on having to purchase a reusable bag that may not in fact be reused at all.
- Aside from using existing plastic bag inventory rather than throwing it out, current supply chain issues also remain a concern for tourism businesses who will likely have difficulty sourcing the requisite type, size and number of bags for the foreseeable future.

b. Do you support the intentions paper's definition of reusable bag? Why or why not?

- Yes. At the same time, it is important to note that studies show many plastic bags are used multiple times for different purposes by consumers.

c. Are you aware of any checkout bag exemptions that should or should not be included?

- As referenced above, tourism businesses should be exempted for an extended and agreed-to period until such time that the industry can provide educational opportunities on the new regulations to prospective visitors from other provinces and countries. A period of two years is likely sufficient.

2. Foodservice Accessories

a. How will foodservice accessories being by-request-only affect your business or the businesses/organization that you represent?

- We foresee additional servicing requirements for businesses at the customer transactional stage, particularly when dealing with foreign visitors who may be unaware of the process for obtaining accessories or unable to read posted signage.
- Businesses are likely to incur additional costs with the necessary redesign of storage areas near check-out counters, in addition to signage and other logistical requirements.
- In fast-food outlets in particular, efficiency is likely to be affected by longer and slower lineups should self-serve options not be available.

b. Under the proposed regulation, self-service stations would be permitted as they meet the 'by-request' requirement. Are self-service stations important and/or helpful to your business or the businesses/organization you represent?

- Yes. Self-service stations remain necessary and appropriate.

c. Are there any disposable foodservice accessories that should or should not be exempt from the regulation?

- Many compostable accessories are not compatible with existing provincial compostable facilities. Therefore, improvements to compostable facilities must be considered in the near future to accommodate current products available and in-use. Alternatively, the Province should consider providing a suppliers list to businesses for sourcing fully compostable knives, forks, spoons, stir sticks, take-away containers and necessary liners/packaging for hygiene and food safety that meet the regulation guidelines.

3. Problematic Plastic Food Packaging

a. Do you support a provincewide ban on containers and certain food packaging made from problematic plastics (e.g. polystyrene foam, PVC, compostable plastics) and on all oxodegradable packaging? Why or why not?

- Ultimately yes. However, viable products must be readily available at a reasonable cost. Until such time alternative products can be sourced and delivered, the province-wide ban should not be implemented.

b. The proposed provincewide regulation includes takeout containers, polystyrene foam or PVC meat and deli trays, and other containers used to package food in the province. Do you have any concerns regarding the range of items that would be regulated?

- Unfortunately, these containers are still necessary for hygiene and safety purposes for the time being. Until compostable alternatives are sourced, readily available and reasonably priced for businesses, these containers will be needed or businesses may be forced to cease takeout or takeaway options resulting in significant revenue decreases or in some cases closure of the service.

c. Food packaging made from compostable plastics will also be banned under the proposed provincewide regulation. How would restrictions on compostable plastic food packaging affect your business or the businesses/organization you represent?

- Theoretically, something labelled as ‘compostable’ should in fact be *compostable*. If the accessory is not compostable, banning it is reasonable. As mentioned previously, provisions should be made to either handle these existing compostable materials at provincial facilities or provide information on sourcing viable alternatives that meet provincial standards.

d. Would your business or the businesses/organization you represent be interested in joining or starting a reuse program to reduce waste from containers and other single-use items? Why or why not?

- Yes, we believe many tourism operators would be keen. However, it would largely depend on the terms of reference or parameters of such a program and what would be expected from a resource perspective by individual businesses.

4. Spheres of Concurrent Jurisdiction – Environment and Wildlife Regulation.

a. The intentions paper identifies further opportunities for municipalities to be empowered to regulate single-use and plastic items under the Spheres of Concurrent Jurisdiction – Environment and Wildlife Regulation. How would this affect your business or the businesses you represent?

- From a tourism perspective, consistent, provide-wide regulation is vital. Different regulations within individual communities will be hard to implement and confusing for operators with multiple locations throughout the province, let alone for visitors who travel to several communities and encounter different or inconsistent regulations.

5. Future Actions

a. Where does your business or the business/organization you represent see a need for further action on single-use and plastic waste?

- As referenced previously, a comprehensive list of suppliers and approved products is necessary to allow tourism businesses an opportunity to source and purchase accessories to comply with provincial regulations.
- Similarly, a communications strategy aimed at the general public (including visitors) would also be welcome to allow tourism operators to educate guests and prospective visitors on the new regulations.

b. What information or guidance would be helpful for your business or the business/organization you represent to transition away from banned and restricted single use items and packaging?

- As above.

c. What actions are needed to promote reuse/refill and/or recycled content to replace single use items and address single-use and plastic waste?

- Educational/information sessions and materials must be made available (via sector associations) to individual businesses to learn about the need for the new regulations, about the regulations themselves, as well as take the necessary actions to comply with the regulations.

6. Compliance and Measuring Success

a. What factors should be considered when developing reporting requirements for businesses to measure progress?

- It is important to make any reporting requirements for individual businesses both minimal and efficient. Operators cannot be bogged down with onerous or extensive reporting obligations. Alternatively, more of the responsibility can be directed to suppliers of compostable materials vis-a-vis products developed and distributed by sector throughout the province.

Summary

The tourism industry was disproportionately impacted by the COVID-19 pandemic. Many businesses incurred significant losses over a two-year period given the lack of international travel and many government-imposed restrictions. In spite of most restrictions being lifted, the cost of travel has risen exponentially, as has the cost of doing business. Access to supplies and the cost of goods and services continues to impact profit, further affecting operators throughout the province.

While the tourism sector understands and supports the need to move toward compostable accessories for multiple reasons, not the least of which is to address issues such as sustainability and climate action, expecting businesses to adjust to new regulations, as well as source new approved materials, deplete existing inventory, and educate guests will be a tall order for the immediate future. In conclusion, the following is a list of recommendations for consideration as identified within TIABC's submission:

- A. A sufficient adjustment period for the tourism and hospitality sector in particular will be necessary, beyond the official implementation of the new regulations.
- B. It is important that both federal and provincial regulations on single use plastics are compatible and that any enforcement measures or regulations at the community level are also consistent across the province.
- C. The province can assist businesses by providing resources for educating operators and consumers on the regulations, locating preferred suppliers, and developing a comprehensive list of approved compostable products.
- D. The province can better equip or resource composting facilities to handle either existing compostables or new products that will be used and discarded by businesses and their customers in future.
- E. Given that most tourism businesses are small, ensuring reporting requirements are minimal and efficient is critical for universal acceptance and adoption of the new regulations by BC tourism operators.
- F. The province should consider offering incentives, tax rebates, grants, or other options in order to encourage tourism businesses to adapt to the new regulations within the province's original timeframe.

Thank you for the opportunity to provide input on the province's consultation on Preventing Plastic and Single-Use Waste in BC. For any questions or comments on this submission, please feel free to contact TIABC at your earliest convenience.

Best Regards,

A handwritten signature in blue ink, appearing to read 'Walt Judas', is positioned below the closing 'Best Regards,'. The signature is fluid and cursive.

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