BUREAU DE SANTÉ DE MIDDLESEX-LONDON HEALTH UNIT

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ATTN: Tracey Spack
Director
Plastics Regulatory Affairs Division
Environment and Climate Change Canada
351 Saint-Joseph Boulevard
Gatineau QC, K1A 0H3
Email: plastiques-plastics@ec.gc.ca

RE: Middlesex-London Health Unit Submission - Single Use Plastic Waste

INTRODUCTION

The Middlesex-London Health Unit is pleased to offer insights on the Canadian government's strategy to regulate single-use plastic production and waste, recognizing it as a crucial milestone in tackling climate change. With the goal of achieving Canada's target of zero plastic waste, the Canadian Government's prioritization of upstream strategies that will facilitate transformative changes at the manufacturer level is required. These measures are crucial for reducing environmental impacts, complementing efforts to address post-consumer waste. The development of comprehensive policies aimed at reducing plastic waste in Canada presents a significant opportunity to collectively address both environmental and public health concerns. By integrating two crucial domains, we can foster approaches that effectively mitigate both human and environmental harm. Drawing inspiration from the Framework Convention on Tobacco Control and its identified objectives, we can formulate strategies that contribute to minimizing adverse impacts on both humans and the environment. The following comments specifically pertain to the utilization of plastics within the commercial tobacco and vapour product industries.

We recommend that the Canadian government ban the manufacturing of cigarettes with single-use plastic filters and prohibit the production and sale of single-use vapes and plastic components for vapour products. By implementing a new product standard that mandates vapour product manufacturers to exclusively produce reusable items, the government can demonstrate environmental responsibility in addressing urgent environmental concerns. These actions will effectively reduce waste and promote sustainability.

Moreover, it is essential to mandate Extended Producer Responsibility (EPR) programs for the commercial tobacco and vapour industries, ensuring they bear the costs of take-back initiatives and incentives to prevent product waste from polluting the environment. By shifting the burden of product disposal management from taxpayers and municipal governments to the producers themselves, the considerable expenses associated with post-consumer waste can be mitigated. This approach not only promotes financial fairness but also encourages producers to take proactive measures in minimizing waste and preserving the environment.

Federal Plastics Registry

We endorse the goals of the Federal Plastics Registry, valuing its transparency and the potential to expand and include other industries in the EPR programs. We emphasize the importance of assigning greater responsibility to manufacturers rather than retailers in the producer hierarchical

approach. Additionally, it is vital to consider the inclusion of online retailers within Canada in the registry, including those who import plastic products into the country.

Numerous jurisdictions have either implemented or are considering the adoption of EPR programs, including methods like municipal litter abatement fees and waste charges on products. San Francisco introduced a cigarette litter abatement fee of $0.85 per pack in 2009, while Korea implemented a waste charge on cigarettes and e-cigarettes back in 1996 (PSC, 2022). In New York State, legislation has been passed for collecting and recycling cigarettes butts through a deposit and refund system, although it is yet to be signed into law (PSC, 2022). The European Union (EU) has adopted an EU plastics strategy with a directive mandating producers to cover costs for awareness-raising, litter clean-up, data gathering, reporting, and waste collection (PSC, 2022). The strategy also requires markings on product packages to inform consumers about plastic content, appropriate disposal methods, and the environmental consequences of litter. EU member states such as Ireland and Spain have implemented EPR Program components as of January 2023.

It is recommended that tobacco and vapour product companies be included within an EPR program. In addition to their inclusion, it is recommended that tobacco and vapour product companies be legally required to report their data on plastics diversion by the end of 2024. Furthermore, it is recommended that tobacco and vapour product companies phase out single-use plastic components in both their products and their packaging through a federally imposed requirement. This decisive action is essential for reducing their detrimental impact on the environment, as well as safeguarding human and aquatic health.

Tobacco Product Litter

Tobacco product waste consistently ranks among the highest contributors to global litter, comprising an estimated 30 to 40% of all litter (WHO, 2022). In the Great Canadian Shoreline Clean Up of 2019, cigarette butts accounted for 42% of all collected litter (PSC, 2022). In Canada alone, approximately 15,000 tonnes of cigarette waste are generated annually (PSC, 2022). The sheer volume of plastic waste from cigarettes, including the 24 billion filters used per year in Canada, magnifies the environmental impact, even with a small percentage of improperly discarded cigarette butts (PSC, 2022). Littered cigarette butts, comprised of single-use plastic filters and toxic chemicals, pose significant harm to the environment (PSC, 2022). Plastic cellulose-acetate filters are resistant to biodegradation and persist in the environment as microplastics, inflicting severe damage on the aquatic ecosystem (Beutel et al., 2021).

A significant majority of Canadians, with two-thirds of those polled in 2021, are in favour of including single-use plastic cigarette butt filters in a comprehensive plastics ban in Canada (Oceana Canada, 2021).

Vapour Product Litter

Most vapour products feature common plastic components such as a case and an e-liquid reservoir. While there is variation in terms of reusability, a considerable number of these devices are not recyclable, and numerous models utilize single-use plastic reservoirs, often referred to as “pods”. The rise in popularity of non-reusable, one-piece “disposable” e-cigarettes can be attributed to their affordability (Beutel et al., 2021).

Although limited studies exist on the prevalence of vapour product waste in the environment, it is highly likely that the surge in usage has corresponded with an increase in littering of vapour product waste, leading to the release of chemical contaminants (Beutel et al., 2021). In Canada, the sale of 90 million vaping pods was recorded in 2019, with vaping rates continuing to rise (PSC, 2022). Recognizing the potential environmental impact, regulatory bodies such as the U.S. Environmental Protection Agency and other environmental agencies classify vapour product cartridges contaminated with nicotine as hazardous waste (PSC, 2022).

In our local Middlesex-London region, it has been confirmed that vapes are not being properly disposed of through electronic or hazardous waste management channels, but instead end up in landfills. This unfortunate practice contributes to a significant environmental impact caused by vapour product waste in our community. Compounding the issue is the escalating youth vaping epidemic. According to the 2021-2022 Canadian Student Tobacco, Alcohol and Drugs Survey (CSTADS) results, 29% of students in grades 7 to 12 have ever tried an e-cigarette (with nicotine, without nicotine, and/or with an unknown content). Furthermore, 24% of students in grades 10 to 12 reported using an e-cigarette in the past month (CSTADS, 2021-2022). Within the Middlesex-London region, Public Health Nurses and Tobacco Enforcement Officers (TEOs) observe frequent vape use among youth in both elementary and secondary schools. During inspections, numerous empty single-use pods are frequently found scattered as litter on the ground. Among youth who vape, TEOs estimate that approximately 75-85% use disposable pods, which are either discarded in the garbage or discarded as litter. Considering that a youth who vapes may use a disposable pod every 1 to 3 days and the popularity of low cost, disposable e-cigarettes is increasing, vapour products' contributions to single use plastic waste should not be underestimated.

Recyclability Labelling

To assist consumers in proper disposal practices, incorporating precise information on product labels, even those that are non-recyclable, would be considered a judicious approach. The introduction of standardized disposal labelling in Canada, akin to the specifications implemented in the European Union, is recommended. While recyclability may differ across the country, it is essential to gather information on commonly recyclable materials and products across all jurisdictions to establish a foundation for standardization. By facilitating clear and consistent disposal guidance, we can empower consumers to make informed choices and enhance waste management practices nationwide.

In the process of determining the feasibility of recyclability labeling, it is crucial to prioritize consultation with the relevant industries; however, we propose the following considerations to guide those consultations:

- In alignment and compliance with the guidelines of the Framework Convention on Tobacco Control, it is recommended that tobacco and vapour product industries be excluded from stakeholder consultations;
- In accordance with article 18 of the Framework Convention on Tobacco Control, the Government of Canada as a signed party, is obligated to protect the environment and health of persons regarding the cultivation and manufacturing of commercial tobacco products; and,
- The potential issue of "greenwashing" by industries when establishing compliance and reporting mechanisms exists and may require mitigation strategies.

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We express our gratitude for the opportunity to contribute our insights to these vital policies that will safeguard the well-being of Canadians and the environment in the years ahead.

Sincerely,

Dr. Alexander Summers, MD, MPH, CCFP, FRCPC
Medical Officer of Health

References

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