



MIDDLESEX-LONDON HEALTH UNIT

REPORT NO. 41-23

TO: Chair and Members of the Board of Health

FROM: Dr. Alexander Summers, Medical Officer of Health
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DATE: 2023 July 20

GOVERNMENT OF CANADA'S PUBLIC CONSULTATION ON SINGLE USE PLASTIC WASTE

Recommendation

It is recommended that the Board of Health receive Report No. 41-23 re: "Government of Canada's Public Consultation on Single Use Plastic Waste" for information.

Key Points

- On November 23, 2018, the Canadian Council of Ministers of the Environment implemented the Canada-wide [Strategy on Zero Plastic Waste](#) to improve waste collection, enhance value recovery, and prevent and remove plastic pollution throughout the entire lifecycle of plastics.
- The Government of Canada was seeking public input on a regulatory framework that would serve as the starting point for the proposed *Recycled Content and Labelling for Plastic Products Regulations* and the federal plastics registry.
- The Middlesex-London Health Unit staff prepared and submitted feedback, attached as [Appendix A](#), by the deadline of May 18, 2023, providing comments that pertain to the utilization of plastics within the commercial tobacco and vapour product industries.

Background

On June 9, 2018, during Canada's 2018 G7 Presidency, a significant milestone was achieved as Canada, alongside France, Germany, Italy, the United Kingdom, and the European Union, adopted the [Ocean Plastics Charter](#). This global commitment aims to tackle plastic pollution and promote responsible plastic use, efficient recycling, and sustainable design. In November 2018, Canada implemented its [Strategy on Zero Plastic Waste](#). The federal, provincial, and territorial governments adopted a Canada-wide Action Plan with two phases: [Phase 1](#) (2019) focuses on improving plastic circularity and implementing systemic changes, while [Phase 2](#) (2020) targets reducing plastic pollution and promoting global cooperation. On April 18, 2023, the Canadian Government launched consultations on a regulatory framework for the proposed *Recycled Content and Labelling for Plastic Products Regulations*. They also released a technical paper outlining the reporting requirements for the federal plastics registry, as part of their commitment to move towards zero plastic waste.

Plastic Pollution from the Commercial Tobacco and Vapour Product Industry

Commercial tobacco product waste consistently ranks among the highest contributors to litter, making up approximately 30 to 40% of all global litter (World Health Organization, 2022). During the Great Canadian Shoreline Clean Up of 2019, cigarette butts alone accounted for 42% of all collected litter ([Physicians for a Smoke-Free Canada \(PSC, 2022\)](#)). In Canada alone, approximately 15, 000 tonnes of cigarette waste are generated annually, with the environmental impact further amplified by the volume of plastic waste from the 24 billion cigarette filters used per year in Canada (PSC, 2022). These littered cigarette butts, containing single-use plastic filters and toxic chemicals, pose substantial harm to the environment. The non-biodegradable cellulose-acetate filters persist as microplastics, causing severe damage to aquatic ecosystems.

Vapour products, particularly disposable e-cigarettes with non-recyclable components and single-use plastic reservoirs, contribute to environmental concerns. The popularity of disposable vapes has led to increased littering of vaping waste, potentially releasing chemical contaminants. In 2019, 90 million vaping pods were sold in Canada, and improper disposal in landfill sites or on the ground as litter is common.

Summary of Key Recommendations

The development of comprehensive policies aimed at reducing plastic waste in Canada is an opportunity to collectively address both environmental and human health concerns. Drawing upon the objectives of the World Health Organization's [Framework Convention on Tobacco Control](#), of which Canada is signed party, the Middlesex-London Health Unit's submission, attached as [Appendix A](#), focuses on the utilization of plastics within the commercial tobacco and vapour product industries. The Middlesex-London Health Unit's comments include the following recommendations:

- Ban the manufacturing of cigarettes with single-use plastic filters and prohibit the manufacturing and sale of single-use vapes and plastic components for vapour products.
- Implement a new standard that would mandate manufacturers to exclusively produce vapour products comprised of reusable materials to reduce waste and promote sustainability.
- Implement 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.
- Require commercial tobacco and vapour product industries to report data on plastics diversion by the end of 2024. Phase out single-use plastic components in both products and packaging through a federally imposed requirement.
- Include single-use plastic cigarette butt filters in a comprehensive ban of single use plastics.
- Introduce standardized disposal labelling in Canada, like the European Union, to provide consumers with information on how to safely dispose vaping products.
- As a signed party to the World Health Organization's Framework Convention on Tobacco Control and in compliance with [Article 5.3](#), exclude the tobacco and vapour product industries from stakeholder consultations due to their conflict of interest.

The Canadian government's strategy to regulate single-use plastic production and waste is a crucial milestone in tackling climate change. Upstream strategies that will facilitate transformative changes at the manufacturing level in concert with efforts to address post-consumer waste are required.

This report was submitted by the Healthy Living Division.



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