

FOR IMMEDIATE RELEASE

Benefitting the Environment and Ecologies by Reducing Plastic Pollution ... Plastic packaging hammer policies are not the answer

OAKVILLE, CANADA, September 7, 2023 — Value Chain Management International (VCMI) issues a commentary/paper in response to <u>ECCC's August 1, 2023 consultation paper</u>.

One of the greatest risks facing industry today is well-intended though poorly conceived policies. Poorly conceived policies and the mechanisms required for their execution have the potential to worsen the issue(s) that they seek to address. Policies and regulatory mechanisms must be based on empirical evidence.

VCMI agrees with the overall aims and direction of policies and regulatory mechanisms published by Environment and Climate Change Canada (ECCC) regarding addressing plastic pollution; however, the detailed objectives published by ECCC in <u>April</u> and <u>August</u> 2023 (particularly the latter) are, in VCMI's opinion, unachievable and will lead to widespread unintended consequences.

Key takeaways from VCMI's response:

1	Hammer policies are an unnecessarily high risk approach to address complex problems, particularly when the proposed mechanisms for change are out of context and untested in relation to the problem(s) seeking to be addressed.
2	Policies must recognize the scale of the conflated relationships that exist between plastic pollution and GHG emissions. Addressing both issues is vital, though addressing each issue requires the execution of complementary solutions.
3	ECCC urgently needs to establish constructive dialogue with industry on addressing plastic pollution. Failure to do so could well result in ECCC losing its credibility as an authoritative government body.
4	The topic of plastic pollution cannot be viewed in isolation. Doing so will undoubtedly lead to widespread unintended consequences.
5	The need for negotiated agreements is particularly critical in Canada's federated system, where provinces/states and municipal governments can impede change initiatives by having implemented conflicting regulations and misaligned systems.

6	Industry must be the driving force for change, with visionary leaders committing to achieve and be accountable for bold targets, and investing in the creation of harmonious precompetitive solutions to address plastic pollution.
7	Government-implemented policies, regulations and programs need to incentivize and assist industry to address barriers that have historically inhibited the formation of circular packaging economies.
8	Successive governments' failure to adequately influence the three factors conducive to ensuring packaging circularity (products, processes and infrastructure) distinctly limits what environmentally conscious businesses are able to achieve.

VCMI's commentary can be accessed <u>HERE</u>.

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Value Chain Management International (VCMI)

VCMI has been conducting analysis and designing then implementing solutions for reducing food system inefficiencies and implementing best practice resource management approaches since 1999. Projects completed by the VCMI team to reduce food and associated waste include 1) supply chain reconfiguration to extend shelf life; 2) packaging optimization – including sizing, functionality, recyclability, and reuse; 3) date labelling to influence changes in supply chain and consumer behavior; 4) working with industry organizations, NGOs, and government agencies to improve communication with industry and consumers; and 5) consulting to private and publicly owned businesses. <u>www.vcm-international.com</u>