Dear Director,

The Polyisocyanurate Insulation Manufacturers Association (PIMA) appreciates the opportunity to comment on ECCC’s discussion paper, *A proposed integrated management approach to plastic products to prevent waste and pollution*. PIMA is the trade association for North American manufacturers of polyisocyanurate (polyiso) insulation products. Polyiso is a popular insulation option in Canada for insulating roofs and walls of homes and buildings. As a durable, energy-efficient product, polyiso insulation enables buildings in Canada to meet the Government’s progressive goals for reducing energy use and associated greenhouse gas emissions as well as addressing the need for more resilient construction.

I. Managing plastics using CEPA

We support ECCC’s goals to remove plastic waste from the environment and to keep future waste from polluting Canada’s waterways. However, we join other stakeholders in expressing our objections to the proposed order that would list “plastic manufactured items” on Schedule 1 of the Canadian Environmental Protection Act (CEPA). CEPA is not a well-tailored regulatory framework to apply to the issue of pollution resulting from the entry of solid waste into the environment. The proposed product bans under CEPA are likely to result in unintended consequences and restrict Canadians’ access to critical materials and products.

Furthermore, the broad order creates the false impression that all plastic products are toxic. No evidence has been presented to support such a conclusion and moving forward with the proposed order could cause reputational harm to many valuable products produced by Canadian manufacturers. Therefore, ECCC should not finalize the proposed order, and rather seek further input on the subject from stakeholders and an impartial scientific panel.
II.  Establishing performance standards

The discussion paper proposes to establish economy-wide performance standards for a minimum percentage of recycled content for plastic products. PIMA strongly encourages ECCC to consider the unique requirements of individual plastic products and to consult with stakeholders on the technical challenges of using recycled content for individual product applications.

PIMA does not believe that establishing a single, economy-wide recycled content requirement will be feasible. This belief is based on the fact that specification requirements for plastics can vary significantly from product to product. For example, many plastic building products have formulations with stringent tolerances for raw materials. This stringency is due in part to the fact that plastic building products are manufactured to meet specific performance requirements that are regulated by building codes and product standards. Consistency in raw materials is key for manufacturing products that must achieve these performance standards. In certain cases, it is not possible to incorporate raw materials produced with recycled content due to the variability in the feed stock. Therefore, imposing an economy-wide recycled content requirement appropriate for one type of product may establish an unachievable minimum for a plastic building product. Furthermore, a recycled content requirement applicable to plastic building products as a class also may not be feasible due to the differences in product chemistries and uses.

Manufacturers of plastic building products place an emphasis on innovation and manufacturing products that deliver positive environmental benefits throughout their life cycles. Work undertaken to establish performance standards for recycled content should consider the unique circumstances of individual product types. We encourage ECCC to engage stakeholders to better understand the limitations of feed stock manufactured from recycled content.

Additionally, ECCC should consider the life-cycle benefits of today’s plastic products. In the buildings sector, plastic building products often provide superior performance to alternatives, which can drive the construction of more energy-efficient, durable and resilient buildings. Finally, as evidence of the polyiso industry’s environmental leadership, PIMA and its members publish Environmental Product Declarations that inform stakeholders of the impacts from the manufacture and use of polyiso insulation products. The most recent industry-wide EPD reports for polyiso products are available at: https://www.polyiso.org/page/EPDs.

III.  Questions and Dialogue

Please contact me at jkoscher@pima.org or (703) 224-2289 should additional information or dialogue with our industry be helpful to the development of appropriate regulatory instruments.

Sincerely,

Justin Koscher, President