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Regional District of
Kitimat-Stikine

Solid Waste Management Plan

DRAFT Technical Memo 3:

REDUCE SINGLE USE ITEMS

APRIL 4, 2019

Contents

REVISION TRACKING

Revision	Date	Revision by	Purpose	Changes made
Rev. 0	April 5, 2019	Authored by S. Wilmot and J. Coosemans; Reviewed by R. Tooms, M. Daly and N. Veikle	Initial authoring of document	
Rev. 1	To be completed following PTAC meeting on April 16, 2019	N. Veikle	Integrate feedback from PTAC prior to presenting to RDKS Board	

The Regional District of Kitimat-Stikine (RDKS) is developing a new Solid Waste Management Plan (SWMP; the Plan) to provide direction for how to reduce, reuse, recycle and dispose of our waste for the next decade. The SWMP will be developed in consultation with stakeholders; a Public and Technical Advisory Committee (PTAC) will advise the Regional District Board on the development of plan targets and strategies. The primary focus of the SWMP will be to improve the operational efficiency of existing programs, services and facilities. Multiple topics have been identified for discussion and development of management strategies within the Plan. Each topic requires scope and context, problem formulation, and identification and preliminary evaluation of options. This information will be presented to PTAC to confirm initial content is sufficient to engage stakeholders. Stakeholder engagement will provide an opportunity for additional topics and options to be identified and evaluated. Feedback from stakeholders and PTAC will help the technical team prioritize topics and identify preferred option(s).

This technical memo presents information about ways to reduce the distribution of single use items.

1. Scope and Context

Common single use items (SUI) include plastic and paper bags, cups and containers made from expanded polystyrene foam, polycoat and plastic cups, take out containers, utensils and straws.

Many SUI are made from virgin plastic. An estimated 8300 million metric tonnes of virgin plastics have been produced to date. Based on an analysis of plastics generation since 1950 to date, the compound annual growth rate for plastics production is 8.4% (Geyer, Jambeck, & Law, 2017). Of the 34.5 million tons of plastic waste generated in the United States in 2015, only 9% was recycled; 12% was incinerated and 79% was landfilled (US Environmental Protection Agency, 2018) or accumulated in the natural environment.

Plastic waste is a leading source of environmental pollution. A recent study by Environment Canada states that “each year, globally, about 8 million tonnes of plastic waste enter the oceans” and that “plastic waste and marine litter, including microplastics (particles of plastics that are smaller than 5 mm), pose a serious threat to the health of our oceans, waterways and well-being.” This study, entitled “*Moving Canada toward zero plastic waste: what we heard from you,*” found that “Canadians are aware that plastic pollution, waste and heavy consumption of single-use items is an issue that needs to be addressed promptly in Canada and around the world” (Environment Canada, 2018).

Non-plastic SUIs also have environmental consequences that could be mitigated by a reduction in use. Although paper and cardboard products do not persist in the environment, their production consumes non-renewable resources and is energy intensive. The production of disposable paper cups has been found to required about 2.5 times its finished weight of raw wood and require six times more steam, 13 times more power, and twice as much cooling water to produce than a polystyrene foam cup (Hocking, 1991).

Based on our current level of understanding, rationale for banning the distribution of SUI includes:

- Plastic items pollute land and water. Plastic never breaks down, and is harmful to wildlife, including marine life;
- Plastics are made from non-renewable resources and contribute to climate change;
- Compostable plastics are difficult to compost fully, and it is difficult to distinguish between compostable and non-compostable plastics;
- The cost of manufacturing and distributing SUIs is incorporated into the cost of purchased goods. The cost of clean up is much higher and is covered by taxpayers;
- Most SUI are difficult to recycle or cannot be recycled. They are a common form of contamination in other recycling streams and can get caught on recycling equipment.
- SUI are expensive to manage; they make up a large proportion of litter.

Rationale in opposition of banning the distribution of SUI includes:

- SUI are convenient and inexpensive;
- Plastic bags can be reused for other purposes, such as containing household garbage or retrieving pet waste (City of Victoria, 2018);
- Recycled plastic bags have value as feedstock for manufactured lumber that can be made into fencing, decks, playground equipment, etc. (Plastics Make it Possible, 2018);
- If plastic packaging were directly replaced by alternatives with no reduction in packaging volume, we would increase the amount of packaging used by nearly 110 billion pounds per year (Plastics Make it Possible, 2018);
- Health codes and lack of dishwashers in quick-serve and take out restaurants may make switching to reusable items for some establishments difficult.

The following sections describe various types of SUI.

1.1.1. Plastic and Paper Bags

The SUI with the highest level of public awareness are plastic bags. The City of Vancouver estimates that two million plastic shopping bags are disposed by its residents each week. While a portion of those plastic bags are reused as garbage bags, plastic bags are a cause of litter in streets, parks, and public spaces, and also make their way to rivers and oceans, causing harm to aquatic animals (City of Vancouver, 2018).

Life cycle assessments of paper bags indicate that the manufacturing process for a paper bag consumes four times more water, emits 3.3 times more greenhouse gases, and causes 1.9 times more acid rain than the production of its plastic counterpart. Additionally, paper bags are six to 10 times heavier than plastic bags, which leads to higher transportation-related emissions and greater landfill space (if not recycled or composted) (AEA Technology Environment, 2005).

1.1.2. Styrofoam

Expanded polystyrene foam (EPS; trademarked Styrofoam) is another form of plastic that degrades over time into microplastics in the environment. Cups and take-out containers contribute to litter and marine pollution. EPS products are only recyclable if they are not contaminated with leftover food or mixed with other materials like paper, plastics, glass, or grit.

Currently, foam cups and containers used by residents of the RDKS can be dropped off at Recycle BC depots; however, this take-back approach is less convenient than the curbside recycling service offered for other recyclables.

A study conducted in California indicated that only 0.8% of the 377,580 tons of polystyrene waste produced in the state was recycled (California Integrated Waste Management Board , 2004). Although this statistic is not within Canadian jurisdiction, it may be inferred that the recovery rate of Styrofoam products versus the amount distributed is likely to be low, particularly in the RDKS, where residents must return these materials to a depot.

1.1.3. Disposable Cups

Disposable cups include polycoat paper cups (such as coffee cups) and plastic cups. Nearly 50% of garbage collected from public waste bins in Vancouver is disposable cups and take-out containers ,22% of litter on Vancouver streets is made up of disposable cups, lids, and sleeves (City of Vancouver, 2018).

Although Recycle BC accepts polycoat paper cups in its household and apartment recycling programs, large portions of the RDKS are not covered by Recycle BC programs (Recycle BC, 2019). Polycoat paper cups can also be disposed through the RDKS organic waste processing stream in the Greater Terrace service area. The GORE compost facility at Forceman Ridge Landfill is capable of composting polycoat paper.

1.1.4. Takeout Containers

Quick-serve and take-out restaurants including street vendors, generally serve meals in disposable containers. Many of these restaurants do not have space for commercial dishwashers or storage for dishes and their business model is built on take away food in disposable containers. Canadian Health codes currently prevent restaurants from filling take-out orders in containers brought in by customers unless they have a documented procedure, approved by their local Health Authority (City of Vancouver, 2018). As a result, reduction and reuse alternatives for take-out containers are not well developed.

1.1.5. Utensils and Straws

Plastic straws and utensils have negative impacts on marine life and the environment. They can be difficult to recycle because they fall through screens on recycling sorting lines that are designed to remove contaminants. These items are not covered under the Recycle BC stream, as they are not packaging. Plastic straws and utensils also have a potential to contaminate compost, as they are often comingled with organic waste.

1.1.6. Compostable Items

Compostable items are often confused with conventional materials when discarded, contaminating both streams and making them impossible to process, with the contaminated materials ultimately being landfilled. It is often difficult to differentiate between plastic and compostable straws and utensils; therefore, these items may be screened out of composting processes and sent for disposal prior to composting or between the composting and curing stages. Additionally, compost facilities have difficulty processing compostable plastic straws and utensils due to their lengthy decomposition time.

2. Approaches to Reducing Single Use Items in Other Jurisdictions

2.1. City of Victoria

Recently, the City of Victoria became the first city in British Columbia to ban the distribution of plastic bags. The ban applies to "single use plastic checkout bags." When the bylaw was proposed, some Victoria residents opposed the idea, stating that they use the bags as kitchen waste catchers or for pet waste.

In Victoria, businesses are permitted to sell paper or reusable bags to customers, but only if a customer requests a bag (businesses may not offer). There is a minimum charge of $0.25 for paper bags and $2 for reusable bags.

The bylaw in Victoria allows small paper bags or plastic bags to be distributed at no cost for the following purposes:

- Packaging loose bulk items such as fruit, vegetables, nuts, grains or candy;
- Packaging small hardware such as nuts and bolts;
- Containing or wrapping frozen foods, meat, poultry and fish (whether pre-packaged or not);
- Wrapping flowers, potted plants;
- Protecting prepared foods or bakery goods that are not pre-packaged;
- Containing prescription drugs;
- Transporting live fish;
- Protecting bed linens, bedding or any large item that can't easily fit in a reusable bag;
- Protecting newspapers or other printed material left at a residence or business; and
- Protecting clothing after it has been professionally laundered.

The ban also does not apply to plastic bags purchased for a specific use, such as garbage bags.

The bylaw was passed after several years of consideration and research. It came into effect six months after it was passed, to facilitate a period of education and awareness. The city budgeted $30,000 for education. Enforcement started six months after the bylaw came into effect (i.e. one year after the bylaw was passed) (City of Victoria, 2018).

The Canadian Plastic Bag Association challenged Victoria's bylaw at the BC Supreme Court on the basis that the City had no power to enact the ban as it was an environmental regulation that required provincial approval (Young Anderson Barristers and Solicitors, 2018). The court ruled in favour of the City of Victoria acknowledging the city's authority to regulate businesses within their jurisdiction.

2.2. Capital Regional District

The City of Victoria is a member of the Capital Regional District (CRD). The CRD has been evaluating options to reduce single use plastic bags since at least 2004. Since then, the CRD has evaluated adding plastic bags to the curbside recycling program, lobbying the provincial and federal governments to take action, promoting voluntary adoption of alternatives, and banning the disposal of plastic bags. The CRD lobbied senior governments and ran campaigns urging

residents to “choose to refuse” plastic bags. Banning the disposal of plastic bags was deemed to be too difficult to enforce.

Following the City of Victoria’s bylaw banning plastic bags, the CRD drafted a model bylaw that may be adopted by other member municipalities. The model bylaw differs from the City of Victoria bylaw in that it allows alternatives to single-use plastic bags, such as reusable containers and bags, to be provided free of charge to customers. The model bylaw includes similar exemptions, although exemptions for transporting live fish and protecting bed linens, bedding or any large item that cannot easily fit in a reusable bag are not included in the model bylaw. The model bylaw does not state a dollar value for tickets that could be issued for contravention of the bylaw (Capital Regional District, 2004).

2.3. City of Vancouver

The City of Vancouver is in the midst of implementing bylaws that cover a broader range of SUI. The process has involved extensive research and consultation over the past three years. The first set of bans is scheduled to come into effect on June 1, 2019. Consultation is ongoing, and the bylaws still require final approval from City Council (City of Vancouver, 2018).

Vancouver is taking a different approach to reducing each single use item, as summarized in Table 1.

Table 1. City of Vancouver Approaches to Regulating Single Use Items

Material Type	Planned Approach	Implementation Timeframe
Plastic and paper bags	Require business license holders to have reduction plans for plastic and paper shopping bags, and report to the number of bags they distribute. Reduction plans can include eliminating distribution entirely, making bags available for a fee, or other custom reduction plan. A full distribution ban on single-use plastic bags may be implemented if annual reduction targets are not consistently met by 2021. Compostable packaging must be approved compostable and paper-based packaging must contain a minimum 40% post-consumer content.	2019-2020
Polystyrene cups & containers	Bylaw will prohibit business license holders from serving prepared food in polystyrene foam cups and take-out containers, beginning June 1, 2019.	Jun 1, 2019
Other disposable cups (plastic and polycoat)	The planned approach is the same as plastic and paper bags. In addition, businesses will be	2019-2020

	required in-store collection of recyclable and compostable cups. Office buildings are required to provide recycling or compost collection programs for disposable cups (2021-2025).	
Other takeout containers	Develop bylaw amendments to require compostable packaging to be approved compostable and paper-based packaging to contain a minimum 40% post-consumer content. Later evaluate need for those requirements and require in-store collection of recyclable and compostable containers and require office buildings to provide recycling or compost collection programs for disposable containers (from 2021-2025). Support the development of sharing/exchange programs for reusable items such as a city-wide reusable take-out container exchange program.	2019-2025
Utensils (cutlery, chopsticks, stir sticks etc.)	Bylaw will prohibit business license holders from providing single-use utensils unless requested by customers.	2019-2020
Plastic straws	Bylaw prohibits business license holders from distributing single-use plastic straws beginning June 1, 2019; exemptions will be granted for health care and accessibility needs.	Jun 1, 2019
All material types	Extensive education, outreach and behaviour change programs will support the initiatives. These will include social media campaigns to educate the public and businesses, language-appropriate educational resources about substitute materials, and display material for businesses to help education customers.	Ongoing

2.4. Provincial Efforts

In 2018, the Union of British Columbia Municipalities passed a resolution calling for the Province to work with local governments and retailers to introduce uniform, province-wide business regulations to substantially reduce the volume of disposable plastic packaging in local solid waste streams.

The Ministry of Environment and Climate Change Strategy responded in 2019 as follows (Ministry of Municipal Affairs and Housing, 2019):

> "The Ministry greatly appreciates local government interest in addressing, through regulation, disposable plastic packaging.
>
> Disposable packaging is currently regulated through Extended Producer Responsibility (EPR) programs. B.C. is proud to be a leader in North America with more EPR programs with higher capture rates than any other North American jurisdiction.
>
> The Ministry has been focused on pursuing continuous improvement with our 22 existing EPR programs and will consider expanding B.C.'s EPR programs as part of our commitment to the Canadian Council of Ministers of Environment Canada-Wide Action Plan for Extended Producer Responsibility.
>
> The Ministry will continue to engage with local government as ministry staff work towards further strengthening current policies and programs. The Ministry commends the actions taken by local governments to develop single-use item strategies and other related initiatives to reduce plastic in the environment."

The latest draft stewardship plan from Recycle BC includes many SUIs as forms of packaging that would be covered by their Extended Producer Responsibility (EPR) program (RecycleBC, 2018). However, not all of the Regional District has easy access to Recycle BC's program, and Recycle BC's focus is on capturing and recycling materials, rather than reducing their use.

2.5. Federal Status of SUIs

The Federal Government released a Greening Government Strategy in 2019 that included waste management elements (Government of Canada, 2019). The strategy includes steps to better manage the use and disposal of plastics in its operations. The government's steps to reduce plastic waste include new commitments to:

- Set explicit targets for diverting plastic waste;
- Eliminate the unnecessary use of single-use plastics in government operations;
- Leverage procurement practices to focus on sustainable plastic products.

Specifically, the Government of Canada has committed to:

> 1. Divert at least 75% of plastic waste by 2030 from federal operations
>
> This target will support the Ocean Plastics Charter commitments to increase the efficient use of resources while strengthening waste diversion systems and infrastructure to collect and process plastic materials (G7 Summit 2018, Charlevoix, 2018).

2. Eliminate the unnecessary use of single-use plastics in government operations, events and meetings.

Single-use plastic items, such as disposable straws, utensils, beverage bottles, disposable hot and cold drink cups, and plastic bags, are a visible component of the plastic waste stream and constitute a significant portion of the plastic litter in terrestrial and marine environments and can be difficult to collect and recycle. While single-use plastics may sometimes be necessary for accessibility, health, safety or security reasons, in many situations they can be avoided entirely or replaced by more reusable, compostable or recyclable alternatives. Alternatives that serve the accessibility and health needs of public servants, such as disposable bendable straws, will still be provided when needed.

3. Procure sustainable plastics products and reduce plastic packaging waste

Public procurement can be used to support markets for more sustainable plastics products, such as those that can be reused or repaired, are remanufactured or refurbished, are made with recycled plastic content, or can be readily recycled or composted at their end of life.

2.6. Local Context

In 2018, 1,952 tonnes of curbside garbage were collected from residents in the Greater Terrace service area, 733 tonnes of garbage were dropped off at the Thornhill Transfer Station, and 4,181 tonnes of garbage from the institutional, commercial and industrial (ICI) sector were brought to the Transfer Station. A waste composition study conducted in 2017 did not specifically identify SUI but did determine the quantity of several categories of plastics in the waste. Some of those categories could contain SUI, such as recyclable rigid plastic packaging (#1 -7), Styrofoam (#6 PS foam), other film and packaging, other rigid plastics and products and compostable plastics. The proportion and quantity of plastic waste (shown as the percentage waste deposited at the Thornhill Transfer Station) is shown in Table 2

Table 2. Proportion and Volume of Select Plastic Wastes in the Waste Stream, Greater Terrace Area, 2017

Quantity (by proportion of total waste and volume) of Plastic Waste in the Terrace Area	Proportion (%)	Tonnes
Blue box recyclable rigid plastic packaging (#1 -7) plant pots and other	2.4%	167
Styrofoam (#6 PS foam)	1.7%	118
Other film and packaging	5.7%	392
Other rigid plastics and products	3.3%	282
Compostable plastics	<0.1%	392
Subtotal potential SUI waste	13.1%	1,350

From this study we can extrapolate that, of the 8,196 tonnes of waste landfilled, approximately 1,350 tonnes of plastic waste, or 13% of the total waste stream, could have been avoided or directed to recycling facilities.

Plastic SUI that are included in the Recycle BC program are sent to Merlin Plastics in Delta, BC. Plastics are separated, ground, washed, and melted into plastic pellets to be re-sold to manufacturers of new packaging. The majority of SUIs made of paper/fibre materials that are not contaminated with food are sold to markets in Asia; the remaining stays in BC (RecycleBC, 2017). Paper SUI that are contaminated with food waste are not accepted by Recycle BC and may be either composted or landfilled.

Currently, Recycle BC depots in the RDKS accept plastic shopping bags, bulk goods/produce bags, bags for baked goods, paper bags, plastic overwrap and similar soft plastics, Styrofoam and cardboard take-out containers (free of food), cups, plates (clean Styrofoam and cardboard only) (RecycleBC, 2017). Single-Use Items that are not taken at Recycle BC depots include plastic cutlery and plastic straws.

A local advocacy group in Terrace, “Plastic Free Terrace,” has gained support and media attention for the banning of SUIs in the Terrace Area. This group currently has a petition distributed within the community, and has gained support of several local businesses, including two large grocers (Terrace Standard, 2019).

3. Problem Formulation

Should the RDKS take steps to reduce the distribution of single use items? If so, which approach is most appropriate in the RDKS?

As regional districts do not have authority to regulate businesses under the Local Government Act, the RDKS does not have the authority to create bylaws regulating the distribution of single-use items by retailers. The RDKS cannot directly implement bylaws that follow the approach taken by some municipalities in BC. However, as the governing body responsible for regional waste management, municipalities may defer this issue to the RDKS for development of a broader, regional approach.

Currently the RDKS has identified six primary options for management of SUIs, as follows:

1. Draft a model bylaw(s) that municipalities can adopt to eliminate the distribution of SUIs;
2. Ban materials identified as SUIs from disposal in landfills owned by the RDKS;
3. Increase education efforts to encourage voluntary reduction of the use of SUI;
4. Work with local businesses to pilot exchange/reuse programs for dishware, containers or cups; and
5. Lobby the provincial and federal government to enact regulations regarding the distribution of SUI

These options in the RDKS will be explored in more detail in Section 4.

4. Stakeholders

The following organizations and categories of individuals will be impacted by measures taken to reduce the distribution of SUI:

- RDKS
- Businesses
- Customers
- Recycle BC
- Local Governments (municipalities and First Nations)

5. Options Analysis

There are numerous initiatives and projects under review within the new SWMP. The RDKS recognizes that implementation of new initiatives under the SWMP must take into consideration multiple factors. Prioritizing new waste management initiatives must consider:

- The needs of the community;
- Servicing requirements, including provincial regulations, bylaws and contracts;
- Cost and financial implications, such as increases in taxation; and
- Organizational impacts, including capacity and resource limitations.

5.1. Develops Model Bylaw for Member Municipalities

Since the RDKS does not currently have authority to directly regulate distribution of SUI, it can support member municipalities by drafting a model bylaw. Using a model bylaw across the Regional District would help to ensure equitable implementation of the changes. Furthermore, the RDKS may consider implementing a bylaw if, in the future, if the organization regulates business licences. Regional districts may hold business licences if enacted under bylaw. The RDKS would have to pass a bylaw enabling business licensing.

The CRD has taken this approach, and the model bylaw was first presented to the Environmental Services Committee in 2017. The District of Saanich is known to have adapted the bylaw for use and is preparing for adoption (Chek News, 2019). Other member municipalities of the CRD have not begun the adoption process at this time.

In contrast, Metro Vancouver has chosen not to prepare a model bylaw for its municipalities, as past model bylaws were not well received. Metro Vancouver staff noted that, in the past, its member municipalities required substantial legal work to be done to adapt model bylaws for adoption. They believe that their resources can be spent more effectively on behaviour change programs.

If the RDKS decides to pursue the development of a model bylaw, the decision must be made about the scope of the bylaw. Would it address only plastic bags, like the CRD bylaw, or would it be more comprehensive, like the bylaws being drafted by the City of Vancouver?

5.2. Ban Disposal of SUI

The RDKS has the authority to ban or restrict certain items from disposal at its landfills. This authority could be used to regulate the disposal of SUI. This approach has not been taken with SUI at any facilities in British Columbia. There are several reasons why this approach is not considered optimal:

- Most SUI would be hidden from inspectors' view by being inside garbage bags, making the ban difficult to enforce;
- The threshold for banned or restricted items in the waste stream is often higher than the baseline quantity of SUI in the waste stream (e.g. if enforcement starts at 15% and SUI make up an estimated 13% now, then the ban would have no impact); and
- There is no alternative market for many SUI. Restricting disposal without alternatives would lead to mismanagement and potentially increased illegal dumping.

Although this option is aligned with the RDKS's authority, it is not recommended for further consideration because of the difficulty in implementation and lack of alternative disposal streams for SUI.

5.3. Focus on Education/Outreach/Behaviour Change

The RDKS may focus its efforts on implementing a behaviour change campaign to help consumers choose alternatives to SUI. Behaviour change campaigns could follow community-based social marketing techniques, which are proven to be effective at increasing environmentally-friendly behaviour. Outreach campaigns should also include businesses and other distributors of SUI, to encourage them to change their distribution practices. Many large retailers already voluntarily charge for plastic bags; this practice could be extended to smaller retailers and other types of SUI.

Many sample campaigns exist that the RDKS could use as a foundation for their work. For example, a resource guide was recently released by Recycle BC to help retailers encourage customers to bring their own bags. The City of Victoria developed a "retail toolkit" to help businesses understand the new bylaw (City of Victoria, 2018b); portions of this could toolkit could be adapted to encourage voluntary implementation of fees for various SUI. Victoria also held a contest for videos that encourage people to bring their own bags (City of Victoria, 2018c).The contest received 24 entries and over 650 votes were cast. A similar contest approach could be used to develop materials related to changing habits around using SUI in the RDKS.

The CRD has also noted that they have been approached by Recycle BC regarding the implementation of a single use plastic bag reduction campaign within the region. If successful, this type of campaign could be replicated throughout the province. The RDKS should follow up with Recycle BC and the CRD to determine what resources are available.

The RDKS would need to decide if the campaign would focus on plastic bags or all SUI. The recommended approach would be to focus on plastic SUIs. Also, the RDKS may evaluate the diversion achieved versus the energy expended on solely implementing an awareness/behaviour change campaign. If implemented concurrently with a ban, a behaviour

change campaign may result in higher diversion while requiring similar expenditure of energy and resources.

5.4. Support pilot projects for exchange of dishware, containers or cups

The City of Vancouver plans to issue a Request for Expressions of Interest for a "Made in Vancouver" single-use item solutions such as a city mug program and reusable straws (City of Vancouver, 2018). Similarly, Metro Vancouver has indicated that it will also find ways to support organizations that set up exchange programs for alternatives to SUI (Metro Vancouver, 2018).

Alternatives to SUI could include travel mugs and reusable take-out containers. Tiffins are stackable stainless-steel containers that are used throughout India. They have achieved a relatively strong following in the Lower Mainland of BC. One business offers a tiffin for $12 (including the first meal) and charges $6 for subsequent meals that are served in the same container, which the customer is responsible for cleaning between uses. Another example is the Tiffin Project (Vancouver Foodster, 2012), which was started by a network of restaurants serving a wide variety of food. Tiffins were sold through participating restaurants, many of whom offered a discount on refills. The Tiffin Project operated for about 3 years; the Vancouver Coastal Health Authority refused to take a stance on the safety of consumer-washed containers, and some of the participating restaurants feared that without explicit approval from the health authority, there was increased risk of liability, if a container caused the spread of disease (The Tiffin Project, 2018).

In the RDKS, the relatively small size and high density of the commercial parts of the main communities means that a program to exchange containers or cups could be more feasible than in larger communities. Individual businesses could set up their own exchange system (which would also function as form of loyalty program) or could partner with similar businesses to create a network. It will be important to liaise closely with the local health authority to address health concerns.

The role of the RDKS would be to present the idea to local businesses and facilitate connections between businesses who might be interested in forming a network. The RDKS would not be responsible for acquiring the alternatives to SUI or providing any financial inputs. The RDKS could promote the program through its SUI strategy.

5.5. Lobby Senior Governments

The RDKS can work both independently and as part of larger organizations (such as the Union of British Columbia Municipalities and the North Central Local Government Association) to lobby the provincial and federal governments to require businesses to restrict SUI. It is unclear at this time what restrictions provincial and federal governments would be willing to or have the authority to impose. To date, the provincial government's focus has been on increasing opportunities to recycle plastic packaging, such as plastic bags and containers.

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