

March 14, 2022



Environment and Climate Change Canada
351 St. Joseph Blvd,
Gatineau, Québec
K1A 0H3

Attention Julie Croteau and Christopher Mariano

Dear Ms. Croteau and Mr. Mariano:

RE: *Technical Guidelines on the Environmentally Sound Management of Plastic Wastes – Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal (The Basel Convention)*

I am writing to you today on behalf of the members of the Alberta Plastics Recycling Association (APRA). APRA is a not-for-profit association that has operated for 30 years, with a focus on the facilitation of sustainable plastics recycling and the diversion of plastics from landfill. Our members include participants in the full plastics value chain, including resin manufacturers, companies involved in manufacturing plastic products, as well as processors and recyclers of plastics. APRA and its members and partners are committed to finding solutions to manage and recycle plastics, and to realize the value of the circular economy, and keep plastics out of the environment.

This submission responds to the March 6, 2022, *ECCC consultation on the Basel Convention Plastic Wastes Technical Guidelines (Technical Guidelines)*. APRA is generally supportive of the Technical Guidelines and is pleased to offer the following comments for your consideration.

As an advocate for the responsible management of plastics, we support the Basel Convention with the consideration of the following.

GENERAL

APRA notes that the Parties to the Basel Convention on the Control of Transboundary Movement of Hazardous Wastes and Their Disposal (the Parties) agreed that the focus of these Guidelines is on the end-of-life aspects of plastic waste. Therefore, while we appreciate many of the suggestions included in the additional proposed language by Norway for the Technical Guidelines, we do not believe the language proposed by Norway is appropriate for inclusion in this guidance document. While there was a discussion early in the process on whether to include design elements in the Guidelines, our understanding is that the parties decided against this. We recommend Norway and other parties direct the Plastic Waste Partnership to consider waste minimization elements, including those outlined in Norway's proposed text, possibly developing a report to share with Basel parties.

RELEVANT PROVISIONS OF THE BASEL CONVENTION AND INTERNATIONAL LINKAGES

International Linkages

APRA is supportive of a common set of definitions and the recognition of various international conventions including the Stockholm Convention, the Minamata Convention, the Montreal Protocol, plastics and microplastics work under UNEA, and the Strategic Approach to International Chemicals Management (SAICM). These multilateral platforms share common environmental goals and offer common verbiage and understanding to help frame this Technical Guidance.

GUIDANCE ON ENVIRONMENTALLY SOUND MANAGEMENT (ESM) OF PLASTIC WASTES

Legislative and Regulatory Framework

APRA notes that the Technical Guidance employs the waste management hierarchy as the guiding principle for the environmentally sound management (ESM) of waste, covering prevention, minimization, reuse, recycling, other recovery (such as advanced or chemical recycling) and final disposal. We appreciate that this provides for lifecycle thinking in the delivery of the best overall outcome.

We note the inclusion of Extended Producer Responsibility (EPR) and ask for the addition of a reference to a circular economy for plastics where plastic products are reused and recycled instead of discarded. A circular economy for plastics can deliver on a variety of policy objectives: recycling targets, zero plastic waste, clean technology, green economy, low-carbon economy, net-zero by 2050. It also provides a framework for policy development and the setting of regulations.

Waste Prevention and Minimization

Option 1, point 6; Option 2, paragraph 105

It is important to note that technologies exist today, and are constantly improving, in the sorting and recycling of all plastics including black plastics. APRA recommends against singling out any products such as this for avoidance.

Option 1, point 12

APRA recommends allowing for market-based measures to enhance flexibility for regulators and to incentivize actions towards waste prevention and minimization.

Option 2, paragraph 102.a.(vi)

It is important to ensure that alternative materials are assessed in the same manner as plastic materials using science-based approaches such as lifecycle analysis.

Environmentally sound disposal

Section 4

APRA emphasizes the critical importance of innovative technologies to ensuring the environmentally sound management and disposal of used plastics. We strongly support policies that recognize the products of chemical,

or advanced, recycling, which refers to processes like pyrolysis and gasification that turn plastic polymers back into monomers and other chemicals, allowing materials to be reused in a variety of ways. These technologies can produce new virgin equivalent plastics and chemicals converted from used plastic materials that would otherwise be landfilled or incinerated. Advanced recycling is important as a complement to mechanical recycling methods currently in use and is necessary to achieving many countries' plastics reuse and recovery goals.

Advanced recycling continues to rapidly scale in North America in response to a growing demand for recycled plastics by converters and brands.

CONCLUSION

APRA appreciates and supports the Government of Canada's commitment to sound science, collaboration, and engagement in shaping the approach to environmentally sound management of plastic waste.

Thank you for the opportunity to share this response. We remain committed to ongoing collaboration as we work to build a sustainable future for plastics.

Sincerely,



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