

June 1, 2022

Nicole Folliet
Director, Chemical Production Division
Industrial Sectors and Chemicals Directorate
Environmental Protection Branch
Environment and Climate Change Canada

Sent by email to pgpc-dppc-cmp-cpd@ec.gc.ca

Dear Ms. Folliet,

RE: “Pre-consultation on draft *Code of Practice for the Environmentally Sound Management of Chemical Substances in the Chemicals, Plastics and Rubber Sectors*”

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.

Thank you for providing the opportunity for APRA to submit pre-consultation comments on the draft Code of Practice for the Environmentally Sound Management of Chemical Substances in the Chemicals, Plastics and Rubber Sectors. This is an important document for our industry, and we appreciate the opportunity to review the draft Code of Practice (Code) prior to the public comment period.

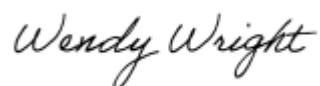
As submitted by our colleagues at the Chemical Industry Association of Canada (CIAC), we agree that any requirements introduced should avoid duplication under programs such as Responsible Care (RC) or Operation Clean Sweep (OCS). APRA’s membership is diverse with members ranging from small owner-managed businesses to large multinational corporations. As such, the principles in programs such as RC or OCS do not apply equally to all our members. We note that many of our smaller members would benefit from the direct guidance from this proposed Code. We recommend that the provisions of the Code provide the flexibility suggested by CIAC to our members who follow programs such as RC or OCS, and provide the direct guidance required by our smaller members. In all cases, we recommend that the administration burdens to comply to the reporting requirements of all these programs should be kept to a minimum, and APRA suggests compliance under these alternative programs as acceptable.

CONCLUSION

APRA is generally supportive of the draft Code of Practice for the Environmentally Sound Management of Chemical Substances in the Chemicals, Plastics and Rubber Sectors. We note that codes introduced should avoid duplication under other programs such as Responsible Care (RC) or Operation Clean Sweep (OCS) while still providing direct guidance to our smaller member companies. The administration burdens to comply to the reporting requirements of all these programs should be kept to a minimum.

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,



Wendy Wright
President
Alberta Plastics Recycling Association
wendy@albertaplasticsrecycling.com
+1-403-750-2743

c.c. Stacey Schaub-Szabo, Executive Director, APRA, stacey@albertaplasticsrecycling.com; Kevin Kernaghan, Secretary/Treasurer, APRA, kevin@albertaplasticsrecycling.com; Courtenay Boyda, Vice-President, APRA, courtenay@albertaplasticsrecycling.com

