



January 14, 2022

Alberta Environment and Parks

[AEP.RecyclingRegulation@gov.ab.ca](mailto:AEP.RecyclingRegulation@gov.ab.ca)

Dear Shelleen Lakusta:

Re: APRA's Submission in response to the What we Heard document

Please accept this submission from the *Alberta Plastics Recycling Association (APRA)* to *Alberta Environment and Parks' (AEP) Extended Producer Responsibility (EPR) What We Heard report*. APRA has been in operation for 30 years and has focused on facilitating plastics recycling and the diversion of plastics from landfill. The Association and its members and partners are committed to finding solutions to manage and recycle plastics; to keep them in the economy and out of the environment. Our members include resin manufacturers, companies involved in manufacturing plastic products as well as processors and recyclers of plastics who will be impacted by the EPR policies and legislation. We support the Government of Alberta's (Government) movement toward EPR policy to advance a circular economy.

Through this submission we highlight a few elements on our perspective on Policy Shift 1 and Shift 2.

## Policy Shift 1: Create an over-arching EPR framework to support EPR programs for recyclable materials

### Definitions

APRA is in support of following the waste hierarchy (reduce, reuse, recycle, recover, dispose) and the Government needs to set and establish inclusive definitions of recycling in its policy (to confirm whether technologies like waste to energy or waste to ethanol (such as the Enerkem facility in Edmonton)) qualify as recycling. Businesses and investors exploring opportunities in Alberta will need to understand this definition before making investments in mechanical recycling, chemical or other advanced recycling facilities as they require access and knowledge of plastic feedstocks to build their business case. We want to ensure that as technologies advance, regulations don't preclude new and innovative companies from bringing their solutions to the Province.

To reduce waste to fuel as the first option, fees should be adjusted based on the recyclability of the package with complex, multi-material packaging charged at a higher rate. To support a zero waste and plastics circular economy the products must have a future beyond initial use or waste to fuel. A focus on recycled quantities will incent producers to make packaging design choices that support recyclability and create economic drivers towards a circular economy and recyclability – on package design, advancing recycling infrastructure and markets for recycled feedstock. Some of these aspects, including packaging design, are well underway at the national and international level – leveraging from and aligning with national and international initiatives would advance consistency.

### Small Producers

For smaller producers participating within the EPR program, consider setting a *de minimus* model with a minimum volume threshold for participation and allow a flat fee on the sale of small quantity materials into the market, like what BC has done. This simplifies the reporting requirements and increases efficiencies for smaller producers (with a single-point of sale or as a charity) so they don't have to file a program plan or join a producer responsibility organization (PRO) and should minimize 'free riders' in the system.

### Capacity, Competition & Innovation

EPR policy in Alberta will help provide a functional and economic boost to recycling in the province, however, a circular economy is only achieved when we remanufacture that plastic into new materials. To do this, we need to drive domestic demand for high quality recycled plastic feedstock and products. To achieve this goal, APRA believes the Government needs to assess and understand the current landscape in the province of managing plastics from all sectors, expanding from a focus on only single-use plastics and PPP, to capture higher volumes of materials. Additionally, consideration should be given to an EPR framework that doesn't unintentionally penalize producers that strive to manufacture products with progressively higher recycled feedstock.

With a small population size coupled with large areas of low population density, it is important that the policy makers consider plastic collection from other sectors (e.g., ICI etc.) as well as realize that Alberta doesn't have the ability to advance the same economies of scale (and thus generation of material) as in the provinces such as British Columbia (BC) and Ontario with larger populations. APRA supports the Government's recognition of the importance of harmonizing materials with BC's existing program. Opportunities for harmonization with all western provinces could help achieve the economies of scale to incentivize innovation, infrastructure and capacity-building investment in the province (i.e., the envisioned regional recycling hub). Without the commitment of receiving consistently high volumes of feedstocks, companies will be challenged to invest in Alberta.

## Policy Shift 2: Develop an EPR program for single-use plastics and packaging and paper products (PPP), and work with industry to identify other plastics to include

### The Addition of Materials Beyond Identified Single Use Plastics and PPP

Design the EPR framework to allow for more plastic products to be designated over time. APRA's focus has been on difficult or hard to recycle plastics. We help run programs and pilot programs in partnership with other stakeholders to evaluate how these materials can be effectively captured and recycled. Two areas of focus include expanded polystyrene (EPS) and agricultural plastics.

APRA fully supports the Government's recommendation to include EPS in the definition of PPP materials. EPS is fully recyclable and best collected as clean packaging direct at the source, or at depot to avoid contamination. In BC, complementary municipal policies to EPR, such as disposal bans and

graduated penalties for disposal, have helped motivate companies to recycle the material as well as encourage business start-ups to process EPS.

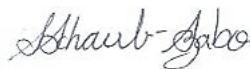
As a member of the Agricultural Plastics Recycling Group (APRG), we are united with over twenty stakeholders across Alberta to promote solutions to ag plastics management. EPR is the best tool to provide a permanent provincial solution for the management of agricultural plastics. EPR legislation for ag plastics would pass responsibility to first sellers of ag plastic to establish a permanent recycling program for the grain bags and twine that they manufacture. The Ag Plastic Pilot program has government funding to recycle grain bags and twine, and was ending April 2022, but not all funds have been spent so the APRG is applying for a program extension. We ask that grain bags and twine be considered as an EPR material sooner, since there will not be enough funds and we don't want to lose the momentum in this three-year program. Assigning EPR quickly thereby frees funds the government can use elsewhere.

Thank you for the opportunity for APRA and its members to share our perspectives and experiences and we would be pleased to address any questions you may have regarding our submission.

Sincerely,



Stephen Tong P.Eng.  
President  
Alberta Plastics Recycling Association  
[stephen@albertaplasticsrecycling.com](mailto:stephen@albertaplasticsrecycling.com)



Stacey Schaub-SzabO  
Executive Director  
Alberta Plastics Recycling Association  
[stacey@albertaplasticsrecycling.com](mailto:stacey@albertaplasticsrecycling.com)

c.c. Wendy Wright, Vice President, APRA, [Wendy.Wright@novachem.com](mailto:Wendy.Wright@novachem.com); Kevin Kernaghan, Secretary/Treasurer, APRA, [kevin@polycycle.ca](mailto:kevin@polycycle.ca).