



July 8, 2022

The Honourable Steven Guilbeault, P.C., M.P.
Minister, Environment and Climate Change
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Re: Draft Federal Sustainable Development Strategy Framework

Dear Minister Guilbeault,

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 31 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 respond to the [Draft Federal Sustainable Development Strategy Framework](#), published on February 1, 2022.

APRA supports many of the comments from our colleagues at the *Chemical Industry Association of Canada (CIAC)* in their response to this framework. We emphasize key aspects in our comments below. We believe that by shifting our mind-set from single use to reuse, post-consumer plastics can be transformed into an ongoing resource in a circular economy. Below we provide comments on chapters of particular interest to our members.

[Canada's Net-Zero and Zero Plastic Waste Commitments \(Chapter 12\)](#)

Plastics are used throughout Canada's manufacturing sector as a critical material required to reach industry and governmental sustainability goals because they are lightweight, energy efficient, moldable, durable, and cost effective. The result is lower greenhouse gas emissions during production and transportation for plastics compared to most alternatives.

However, more is needed to reduce emissions along the chemistry and plastics value-chain to meet new ambitions set out by federal and provincial governments. In 2019, the Government committed to the goal of net-zero emissions for all of Canada by 2050, and in 2020, the Net-Zero Emissions Accountability Act came into force. Reducing emissions for all Canadians in key sectors such as green buildings, more fuel-efficient transportation, clean energy, clean technology and sustainable agriculture would be impossible without chemistry and plastics. That is why the plastics industry is supportive of the majority of plastics packaging being reused, recycled, or recovered by 2040; along with implementation of a pellet and flake management program, such as Operation Clean Sweep® (OCS), an international plastic

stewardship program aimed at eliminating the escape of plastic pellets from industry operations, with a focus on preventing leakage into rivers and oceans.

The plastics sector is poised to respond to these ambitious goals with initiatives that will contribute to the decarbonization of its own value-chain. In turn, the outputs of the chemistry and plastics sector become key feedstock to help decarbonize the broader manufacturing sector, thereby creating a low-carbon advantage for international trade of products manufactured in Canada.

We note that the FSDF highlights many actions to reduce plastic waste identified in the Ministerial Mandate letters which will result in use of alternative materials to plastics. We suggest that consideration be given from a life-cycle perspective to the environmental costs of alternatives that would be selected in the event plastic products are banned or restricted.

Numerous studies^{1,2,3} have shown that the environmental cost of using plastic in consumer goods is less than alternative materials. A life-cycle assessment of plastic products would ensure that both the societal costs of mismanaged plastic products and benefits of plastics are evaluated and compared to alternatives, helping avoid situations where alternatives selected have a larger overall environmental footprint. For example, the plasticized cardboard that often replaces polystyrene take out containers are proving more difficult to recycle than polystyrene itself.

APRA supports programs that manage post-use plastic. APRA is an integral part of a multi-stakeholder committee, the Agricultural Plastics Recycling Group (APRG), overseeing an agricultural plastics recycling pilot program for grain bags and twine in Alberta. Farmers are looking for sustainable and responsible solutions to manage their ag plastics. Since 2019, the first three years of the pilot program, over 1850 tonnes of grain bags and 230 tonnes of twine have been recycled. The pilot led to the establishment of a processing facility in Alberta and industry players are working to bring solutions full circle by remanufacturing the recycled content back into ag plastics materials. The APRG is advocating for extended producer responsibility legislation in the province as a permanent solution to manage ag plastic going forward. The APRG is also committed to working on solutions for other hard-to-recycle ag plastics such as silage plastic and bale wrap.

Plastics are a Critical Component of Generating Clean Energy (Chapter 7)

APRA agrees that clean and affordable energy is essential to Canada and the world's aspirations to decarbonize the economy and achieve net zero greenhouse gas emissions. Plastics are a critical element to realize that vision as they are a key element in the manufacturing of the technology used to generate renewable energy. Items such as wind turbines and solar panels require significant volumes of plastics in their design and manufacture. Canadian plastics have a lower carbon footprint than naphtha-based plastics manufactured internationally, providing the Canadian manufacturing and renewable energy sectors with a carbon advantage over other jurisdictions.

Reducing emissions for all Canadians in key sectors such as green buildings, more fuel-efficient transportation, clean energy, clean technology and sustainable agriculture would be impossible without plastics. In Canada, the building sector alone is responsible for 40 per cent of greenhouse gas emissions (GHGs). Insulation, window coatings and vinyl frames, reflective roofing and other innovative plastics-

based materials dramatically lower emissions from the building sector by reducing heat loss and the demand for cooling. In transportation, lighter vehicles, alternative fuels and electric vehicles will also depend on continued advances in plastics.

Investment in Plastics Recycling Innovation and Infrastructure (Chapters 8 & 9)

The plastics value chain, including resin manufacturers, recyclers and brand owners are committed to working with government to help meet policy goals of zero plastic waste, circular economy, and net-zero. Our industries are a critical partner in helping Canada put in place the solutions required to deliver on climate and sustainability goals.

Today in Canada, only nine per cent of all post-consumer plastics are recycled due to a multiplicity of unharmonized recycling systems, inadequate access to collection and sorting, limited adoption of mechanical and advanced recycling technologies, and few end-markets for recycled plastics. This represents a significant lost opportunity cost for plastics in Canada.

Investment in a circular economy for plastics in Canada could result in an annual GHG emissions savings of 1.8 MT of CO₂¹, as well as deliver on a variety of other federal and provincial policy objectives: recycling targets, zero plastic waste, clean technology, green economy, low-carbon economy, net-zero by 2050. To accomplish those outcomes, Canada needs transformational system change to address current recycling challenges and meet the demand for recycled plastics — to keep plastics in the economy and out of the environment.

Furthermore, the scale up of advanced recycling technologies coupled with the decarbonization of resin manufacturing, will compound that advantage. Advanced recycling encompasses new technologies that transform plastic products back into their basic molecules, allowing the production of new resins, pellets, and plastic products that will continuously recirculate in the economy. There is significant value in being able to provide the world with clean energy that is produced on the foundation of low carbon recycled plastics.

It is estimated that the global demand for plastics will triple by 2050 to meet our climate change and emission goals because plastics are an energy efficient material with a lower environmental footprint than most alternatives. With a circular economy for plastics, nearly 60 per cent of the 2050 demand could be covered by production based on previously used plastics.⁴ In contrast, today's linear economy is only able to meet six per cent of real demand for recycled plastic.

As the FSDF recognizes, some of Canada's infrastructure is aging and at risk, including our recycling infrastructure. According to a 2021 study by commissioned by Environment and Climate Change Canada, Canada's recycling infrastructure capacity gap will require a capital investment of \$4.6 - \$6.5 billion. Addressing a funding gap of this magnitude requires a collaborative approach between industry and governments. Investing in modern recycling technology and commercialization of recycling innovation are prime examples of green infrastructure, since the low carbon plastics that result from those processes contribute to low-carbon transportation, climate-resilient buildings and clean energy while driving economic growth.

Environmental Stewardship Programs

Eliminating plastic pollution caused by plastic resin loss during production or transportation is a critical issue for the environment and the world's waterways. Spilled plastic resin can make its way into local rivers, lakes, and oceans affecting waterway ecosystems and wildlife. Pellet and flake management programs such as OCS play a critical role in being part of the solution to this global issue.

Responsible management of plastic resin is key to ensure that plastics continue to play a role in our modern, sustainable way of life.

CONCLUSION

APRA and its members and partners are committed to finding solutions to manage and recycle plastics and working to realize the value of the circular economy and keep plastics out of the environment.

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, and we would be happy to meet with you to continue the discussion.

Sincerely,



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