

February 23, 2022

The Honourable Steven Guilbeault, P.C., M.P.
Minister, Environment and Climate Change
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Tracey Spack
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Environment and Climate Change Canada
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Dear Minister Guilbeault,

RE: Notice of Objection and Request for Board of Review in relation to the Single-Use Plastics Prohibition Regulations, *Canada Gazette*, Part I, Volume 155, Number 52, 2021-12-25

I am writing to you today on behalf of the members of the Alberta Plastics Recycling Association (APRA). 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.

Based on the many decades of combined experience of APRA and our member's work in managing the challenges and successes of post-use plastics we strongly believe that banning single-use plastic (SUP) is not in the best interests of the Canadian, provincial/territorial governments, industry or communities and is at odds with our international partners in our collective objective to enhance the plastics circular economy in Canada.

This submission responds to the December 25th, 2021, *Canada Gazette Notice* ("Notice") in which the Departments of the Environment and Health sponsored Single-Use Plastics Prohibition Regulations were published. APRA formally objects to the proposed regulation and along with our colleagues at the Chemistry Industry Association of Canada (CIAC), requests the establishment of a Board of Review under section 333 of the *Canadian Environmental Protection Act* (the Act) to review the recommendations.

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. We support the Government of Alberta's movement toward Extended Producer Responsibility (EPR) policy to advance a circular economy. The Alberta Government, through the *Natural Gas Vision and Strategy* – is focused on becoming the western centre of excellence for plastics recycling. This strategy aims to establish a plastics circular economy in the Province. EPR policy in Alberta will help provide a functional and economic boost to recycling in the province. The Federal Government is creating confusion to the market and investors by banning plastic (a provincial jurisdiction), while at the same time provincial governments across Canada are moving to establish EPR.

British Columbia has implemented EPR and other provinces, including Ontario and New Brunswick are moving toward 100% EPR to manage packaging. Brand owners have long shown their willingness to participate in these regulations. Many companies are advancing their own sustainability goals, initiatives,

and products, without government regulation, because it is the right thing to do. Three industry examples include:

- NOVA Chemicals' joint development with Enerkem on advanced recycling, and
- Merlin Plastics partnership with NOVA Chemicals to increase the availability of high-quality recycled materials for incorporation into new products, and
- Dow's global commitment to divert one million metric tonnes of plastic waste out of the environment.

In Alberta, APRA and partners recently have advanced several projects to better manage plastics including:

- The implementation of *Operation Clean Sweep*® with Alberta companies, to keep plastic pellets and flake out of the environment;
- A three year, \$1M Alberta-wide agricultural plastics recycling pilot project for grain bags and twine;
- The *Plastics Data Gathering Pilot Project* in the Edmonton region to characterize and quantify plastic waste by industry and institutions and identify opportunities to advance a circular economy in the region - partly funded over two years by Environment and Climate Change Canada's *Zero Plastic Waste Initiative*; and,
- A founding participant in the *Plastics Alliance of Alberta*, a multi-stakeholder collaboration committed to providing policy recommendations for the Government of Alberta's *Natural Gas Strategy* and advancing a circular economy for plastics in the province.

As a government committed to sound science, collaboration, and engagement, we believe the establishment of an independent Board of Review is required to review the work of the government due to the selective analysis outlined in the Regulatory Impact Analysis Statement. Government decisions and regulations must be based on current and complete science, technology, and practices that will actually achieve stated environmental outcomes rather than create future environmental impacts that may be difficult to manage. We are available for further discussion.

Sincerely,



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