



APRA Response to the Online Consultation: Canada's Voice - International Legally Binding Agreement on Plastic Pollution - October 28, 2022

1. What issues related to plastic pollution are the most important to you?

As an Association representing members across the plastics value chain, the Alberta Plastics Recycling Association, believes that plastic belongs in the economy and out of the environment. At the manufacturing and transportation level, prevention is an important step. Our Association has worked to help companies implement plastic pellet and flake management programs to keep their facilities clean and ensure no plastic is lost during transport or the movement of plastics.

A significant issue that needs to be addressed throughout the world is the lack of waste management systems in communities to collect and process waste. Unmanaged waste causes serious environmental and economic damage. Policies such as extended producer responsibility (EPR) can help ensure packaging is managed at the end of its life and designed from the outset to be marketed into new material.

It is also important to educate the public about the opportunities to return materials for recycling and the importance of picking up litter in their communities.

A global agreement should focus on supporting the creation of local and regional systems to collect plastic (and other) waste and utilize its inherent value through recycling, reuse, or repurposing. It should also ensure plastic (and other) packaging is properly managed within a circular economy.

Communities will need political support, technical expertise, and funding to develop the most appropriate solutions tailored to the local/regional situation.

2. How can governments, individuals, organizations, and communities mobilize to help reduce plastic pollution globally?

APRA supports the recommendations from the International Council of Chemical Associations (ICCA) and the World Plastics Council (WPC) for 5 key elements for a global framework. These include:

1. Governments commit to eliminate leakage and establish national action plans,
2. Harmonized definitions and reporting,
3. Guidance to improve product design,
4. Waste management capacity building and technology deployment, and
5. Achieve climate goals.

All organizations must work together to reduce plastic pollution. There need to be economic drivers to keep plastic in the economy and out of the environment. This means policies that encourage investment and new infrastructure to process plastics. This includes an approach to sustainability that recognizes the value of plastics and supports a multi-pronged approach to product sustainability including material reduction (light-weighting and downgauging), designing for recycling (products and packaging), post-consumer resin (PCR) incorporation, and expanding the supply of recycled plastic content through mechanical and advanced recycling. It also means policies such as EPR that require companies to manage the material at their end of life.

Requiring recycled content in materials helps to drive demand to capture and remanufacture plastics. Citizens have an important role to play to participate in return and recycling programs. Businesses have an important role to play in procurement of materials that they know can be recycled and managed responsibly.

There also needs to be tracking of waste flows. We need to start at the locations where the waste is ending up and trace it back to those companies and countries that are shipping waste material overseas. There are viable companies who are shipping commodities of recyclable plastic overseas, however those who are shipping waste are conducting illegal business that is harmful to the entire industry. That tracking should help identify who the players are and what rules or reform is needed to change the system.

3. From your perspective, where across the plastics lifecycle are actions needed to most significantly reduce plastic pollution globally?

- A. Upstream measures: including production, manufacturing, chemical hazard reduction and sustainable product design for a circular economy.
- B. Midstream measures: including managing consumption and movement of plastics.
- C. Downstream measures: including waste, end-of-life management, remediation, and marine plastic pollution.
- D. **Other: - a mix of all of these tools from players across the plastics value chain. However, upstream measures will drive changes across the system.**

4. Please provide a brief explanation for your selection in Question 3.

The process has to start at the design of the material – a design to capture and re-process the materials – thereby advancing circular materials and promoting a circular economy.

Collaboration is needed among all stakeholders. There is an opportunity and role for government to work with the private sector, industry (plastic, waste management, brands, etc.) and other key stakeholders to help unlock funding and facilitate the acceleration and scale-up of additional recycling infrastructure for both mechanical and advanced recycling and help ensure an adequate supply of recycled content is available to the market. It is important that plastics and other materials are collected, sorted, and processed appropriately and that starts with providing universal access to waste collection.

The global plastics industry is investing heavily to increase circularity, from product design for recycling to next-generation technologies that dramatically increase the availability of recycled plastics. We are calling on governments to develop the enabling conditions that unlock access to post use plastics. Smart public policies can help transform this valuable material into new, circular products at the quantity and quality needed by society. National action plans that identify and address policy and infrastructure gaps are critical to attracting public and private sector investments to accelerate the transition to a circular economy in which post use plastic feedstocks are a source of revenue.

5. From your perspective, are there specific measures that would be most effective in reducing plastic pollution globally?

- A. Reduction, including phase out and reduction of certain types of plastic products
- B. Design, including labelling, minimum recycled content, recyclability
- C. Waste management, including collection and recycling targets, extended producer responsibility, clean-ups of polluted areas
- D. other – a mix of measures

6. Please provide a brief explanation for your selection in Question 5.

Many communities throughout the world lack even basic systems to collect waste. Used materials often are discarded onto land and into waterways to our oceans. This unmanaged waste causes serious environmental and economic damage.

A global agreement should focus on supporting the creation of local and regional systems to collect plastic (and other) waste and utilize its inherent value through recycling, reuse, or repurposing. Communities will need political support, technical expertise, and funding to develop the most appropriate solutions tailored to the local/regional situation, in particular the role of the informal sector.

7. What should be the overall objective(s) of a new international legally binding agreement on plastic pollution?

A new global agreement should have a targeted and measurable goal to ensure access to proper waste management, eliminate leakage of plastic into the environment, and promote circularity.

Countries have already agreed to the Basel Convention, however, there are still countries and that accept imports of material that would be classified as waste and companies from countries that are shipping this material overseas. As the commodification of waste as a resource is a global business, governments need to understand how to manage materials domestically or ensure that agreements and investments made, and the technology put in place to help countries that do not have strong economic or environmental practices to manage the material that ends up there.



8. What elements should be included in a new international legally binding agreement on plastic pollution?

- A. Baselines and/or targets.
- B. National action plan.**
- C. Sustainability criteria.
- D. Bans and/or restrictions.
- E. Material and/or chemical composition transparency mechanisms
- F. Monitoring and/or reporting**
- G. Product stewardship incentives and/or standards**

9. Please provide a brief explanation for your selection in Question 8.

Industry supports a new global agreement with a targeted goal to ensure access to proper waste management, eliminate leakage of plastic into the ocean, and promote circularity.

We believe the following elements are key for a global framework:

1. Governments Commit to Eliminate Leakage and Establish National Action Plans: Adopt the G20's 2050 Osaka Blue Ocean Vision and allow countries flexibility to develop regionally appropriate plans to eliminate plastic waste leakage based on local circumstances and supported by enabling policies.
2. Harmonized Definitions & Reporting: Develop, with industry input, globally harmonized definitions and reporting metrics on plastics and plastic waste, using validated and harmonized methodologies.
3. Guidance to Improve Product Design: Develop global guidance, with industry input, on product design, recycled content, and resources efficiency optimization
4. Waste Management Capacity Building and Technology Deployment: Ensure access and improve waste management capacity. Support chemical recycling technology, complementing mechanical recycling, to increase circularity of plastics
5. Achieve Climate Goals: Support life cycle analysis to evaluate impacts of plastics and alternatives

Flexibility is important for countries to adapt their regulatory framework and prevent adverse environmental, health, and socioeconomic impacts. Globally mandated controls should not be imposed on production and consumption of plastics or plastic products. Impacts of proposed measures must be assessed to reduce regrettable substitutions.

10. How can a new international legally binding agreement on plastic pollution support the transition to a circular economy, including support for innovative technologies?

Creating a circular economy for plastics – in which plastic products are reused and recycled instead of discarded – will help achieve the UN Sustainable Development Goals (SDGs), including

goals on climate action and life below water. Plastics (and other materials) should be used for as long as feasible and then repurposed to prevent them from becoming waste. A global agreement can help develop supply chains as well as robust waste collection and recycling infrastructure that supports local/regional solutions to creating a circular economy and ending plastic waste.

A global agreement should focus on supporting the creation of local and regional systems to collect plastic (and other) waste and utilize its inherent value through recycling, reuse, or repurposing. Communities will need political support, technical expertise, and funding to develop the most appropriate solutions tailored to the local/regional situation, in particular the role of the informal sector.

A global agreement can enable communities to develop new enterprises utilizing materials that today are viewed as waste. Given the appropriate expertise and resources, communities can develop solutions to plastic waste that create new products, markets, and jobs, leading to local/regional supply chains that consume used plastics. Communities should have the flexibility to create their own solutions that fit the needs and economies of their area.

Partnering with the private sector will be key to successfully creating these supply chains. Chemical and plastic makers stand ready to work with governments to facilitate cross-value chain collaborations, elevating the priority of waste management, minimizing inadequate disposal, enhancing solid waste infrastructure, improving livelihoods of waste collectors, and enabling sustainable growth in markets for recycled materials.

Enhancing the deployment of new recycling technologies will increase the value of recycled materials, encouraging sustainable supply chain growth. For example, advanced (chemical) recycling technologies can significantly expand the amounts and types of plastics that can be recycled, converting non-recycled plastics into feedstocks and new products. Advanced (chemical) recycling technologies are complementary to traditional mechanical recycling and can be an important part of communities' integrated solid waste management. These technologies can be tailored to specific local/regional/national needs, such as incorporating the informal recycling sector. Countries should ensure permitting frameworks and regulations for recycling technologies enable deployment of these advanced 21st century innovations.

A global agreement can help facilitate collaboration between government and the private sector by developing guidance on sustainability by design approaches. The plastics value chain can contribute in this respect as it is already applying "Sustainability by Design" approaches for developing innovations in product delivery and packaging formats to reduce waste and increase recyclability and recoverability.

11. What domestic or international initiatives are you involved in that could help inform the development of a new international legally binding agreement on plastic pollution?



APRA's and its members are involved in a number of initiatives to help address plastic pollution. These include participation with groups including but not limited to:

- **The Alliance to End Plastic Waste**, a network that holds one another accountable in the bold ambition of ending plastic waste globally.
- the **Canada Plastics Pact (CPP)**, unites leaders in Canada's plastics value chain, NGOs and public sector organizations behind a common goal to create a circular economy for plastics packaging in Canada so that plastics stay in the economy and out of the environment.
- **Closed Loop Partners (CLP)**, working to establish a \$35M (USD) investment fund (**Circular Plastics Fund**) to catalyze capital to drive a circular economy and end plastic waste, with a goal of reaching \$100M (USD) investment by the end of 2022.
- **Great Lakes Plastic Cleanup (GLPC)**, which was launched with the support of ECCC and other partners to remove plastic waste, prevent it from entering the Great Lakes, and educate the public.
- **Operation Clean Sweep (OCS) and OCS Blue** (a campaign to prevent plastic pellets, powder, and flake loss at plastic-handling facilities), the industry's product stewardship commitment to keeping plastic pellets out of the environment.
- **Chemistry Industry Association of Canada (CIAC) and the CIAC Plastics Division**, which represents Canada's leaders in plastics industry sustainability – a \$35 billion sector that directly employs over 100,000 Canadians.
- **American Chemistry Council (ACC) and the ACC Plastic Division**, which represents U.S. leaders in the plastics industry sustainability (America's Plastic Makers)
- Endorsement of the **5 Actions for Sustainable Change**, a plastic industry plan announced in 2021, which has as its first action to require plastic packaging to include at least 30% recycled plastic by 2030.

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. While industry will now be responsible for recycling programs under provincial Extended Producer Responsibility, addressing a funding gap of this magnitude requires a collaborative approach between industry and governments. Public-private ventures such as the proposed Circular Plastics Innovation and Infrastructure Fund, as identified in federal mandate letters for Ministers of Industry and Environment, is an example of how industry and government can partner to achieve goals.

12. In your view, how can specific groups or communities (e.g., Indigenous Peoples, environmental non-government organizations, industry associations, youth, various levels of government, etc.) engage in developing a new international legally binding agreement on plastic pollution?

These groups should be actively engaged to advance the circular economy; both domestically and internationally. These groups can be involved to help enforce, educate, and provide opportunities for increased oversight and management. Industry associations represent broader



interests in this area and should be seen as a collaborative partner in helping to shape understanding of the industry's views by governments and our willingness to drive solutions.

13. Do you have any other views you wish to share with us?

The plastic recycling industry is a significant contributor to the global economy. Plastic as a commodity must continue to be transported across borders to meet market demand. However, we have to be prepared to seriously increase innovation and investment within North America and also enforce and regulate non-compliance in the system for those companies who are moving waste overseas illegally.

APRA supports the ICCA's "*Sustainable Financing for Plastic Management*" which states: The chemicals and plastics industry strongly support the creation of a new global agreement to help prevent leakage of plastic waste into the environment. Such an agreement must include adequate financing for developing countries to develop and implement national action plans and improve waste collection and recycling infrastructure. While it is not the only objective, achieving universal access to waste collection and transitioning from incineration and landfilling toward reduction, re-use, collection, and recycling should be a primary goal of any global agreement on plastic pollution. Other aspects of the agreement, including product design guidance, have a connected role in increasing recovery and re-use of plastics. Countries will not be able to meet their obligations under a new global agreement without adequate financing, capacity building, and technology transfer. Donor countries, development banks, financial institution, and industry all must play a role in accelerating investments.



ALBERTA PLASTICS RECYCLING ASSOCIATION

ADVANCING PLASTICS CIRCULARITY

A screenshot of a web browser window. The browser's address bar shows the URL: placespeak.com/en/topic/6697-canadas-voice-towards-an-ambitious-new-legally-binding-global-agreement-on-plastic-pollution/#/survey. The browser tabs include 'Inbox (10) - tjsc...', 'PlaceSpeak - Can...', 'Google Calendar', 'DelegateList(pul...', 'Contact - MODIX', 'APRA Executive', 'Alberta Circular', and 'ACPD sponsorsh...'. The page header features the 'Canada' logo on the left and navigation links 'Why Participate' and 'Ways To Participate' on the right. The main content area has a dark blue background with a white 'Survey' button icon. A white pop-up window titled 'Open Survey in Fullscreen' is centered on the screen, displaying the following text: 'Canada's voice: towards an ambitious new legally binding global agreement on plastic pollution', 'Thank you!', and 'Your survey responses have been recorded.' The Windows taskbar at the bottom shows various application icons and system tray information including 'ENG US', '12:58 PM', and '2022-10-28'.