



January 20, 2023

Denis Gingras  
Standard Developer  
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**RE: BNQ Draft Standard D 3840-100-6 Recycled Plastic Content Products**

Dear Mr. Gingras,

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 32 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 Bureau de normalisation du Québec (BNQ) public consultation on draft standard D 3840-100 *Recycled Plastic Content Products*; our comment form is attached. APRA supports many of the comments from our colleagues at the *Chemical Industry Association of Canada (CIAC) Plastics Division* in their response to the consultation. In particular, one area that requires immediate modification is around the conversion of outputs from advanced recycling to a mass basis using the mass balance system.

Only about 50 per cent of the plastic packaging today can be managed through mechanical recycling, to achieve a circular economy both mechanical and advanced recycling technologies are required, and standards related to certifying or recognising recycled plastics need to be adapted to reflect this dual path requirement. This means that for all advanced recycling technologies, including those currently using mass balance, there needs to be the ability to formally recognise the amount of recycled plastic (on a mass basis) that has been incorporated into products.

We are committed to working with all stakeholders to develop innovative and progressive pathways towards a circular economy through improved product design, enhanced recovery systems, and augmented end-markets for post-consumer plastics. The result will be continuous and efficient re-circulation of resources in the economy, and the elimination of plastic waste.

Thank you for the opportunity to participate in this public consultation, please do not hesitate to reach out should you have any questions.

Sincerely,

*Wendy Wright*

Wendy Wright

President

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