



May 18, 2023

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Director, Plastics Regulatory Affairs Division
Environment and Climate Change Canada
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Re: APRA Response to the Technical Paper: Federal Plastics Registry

Dear Ms. Spack,

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 Technical Paper: Federal Plastics Registry**.

Below we provide comments on areas of relevance to our members' expertise.

The adoption of Extended Producer Responsibility (EPR) regulations across Canada that are consistent, comprehensive, and transparent will provide the necessary foundation for implementing a circular economy and keeping plastic out of the environment. APRA also supports the adage that you can't manage what you don't measure, so we support the efficient collection of data required to achieve a circular economy and the zero plastic waste agenda. Data also helps make the business case for growth, investment, and development of new infrastructure. In principle, APRA and its members support the concept of a plastics registry, as well as the proposed phased implementation, however there are concerns with the delivery and implementation of the Federal Plastics Registry, as proposed by Environment and Climate Change Canada (ECCC).

Summary of points:

- **APRA believes that as the provinces and territories are the regulatory authorities for EPR, the provinces and territories should be the entities leading the creation of the Plastics Registry.**
- **In terms of calculating data points, APRA would like to see the inclusion of three reporting categories as downstream data points, to include plastics converted to manufactured fuels,**

those burned for energy recovery, and finally plastics incinerated as a final disposal. APRA supports the waste hierarchy and within that, recycling over energy recovery, however, while markets for circular products are still developing, fuel will likely be part of the early outputs from advanced recycling facilities. All recovered fuel at these facilities should be recognised as recovered material and diversion from landfill, not as incineration. APRA concurs that these recovered materials are not recycled and should not be included in recycling targets. Furthermore, as demand for circular materials increases, these fuels can be diverted for use as feedstock to additional processing units for new plastics or other chemicals manufactured. All of these uses should be reported.

- **APRA believes that ICI should be included in the transition to EPR across the country, however, there are few provinces that have legislated EPR for ICI programs. Doing so at the Federal level first creates confusion among jurisdictions and businesses.** Producers do not have the level of detail outlined in Table 1 on upstream and downstream data points. They know what they need to meet their supply chain requirements, nothing more. While the goal of advancing a circular economy is to have companies more aware of the circularity of their manufactured items, there are very few today that have insight into how much is captured for recycling, reuse or repair downstream.
- **The timelines for whole industries to implement this reporting are extremely tight - to go from zero reporting or awareness in 2023 to full reporting by 2028 will be unattainable for the number of industries listed and businesses that will be impacted.** Alberta is only just implementing EPR for packaging in 2025, and to also require ICI reporting in that window is too much, too soon for businesses.
- **APRA strongly recommends that the Federal Government expand Statistics Canada’s Pilot Physical Flow Account for Plastic Material (PFAPM) rather than build a new system and increase administrative burden on both government and industry.** As soon as possible, there should be more information shared about what a “suite of open standards for plastics data” would entail. CSA and BNQ have already started down the path to address standards and it’s important to avoid a patchwork of standards. We want to increase harmonization, not increase difficulties for companies to comply.
- **In the proposed federal producer definition, it is unclear whether the reference to “residency in a province or territory” is referring to residency in a province that doesn’t have EPR for packaging or if this refers to residency in any province or territory in Canada.** The latter would be aligned with the emerging definition of producers and APRA supports using residency in Canada as the basis for determining brand owner residency.

Conclusion

APRA appreciates the opportunity to provide comments on **the Technical Paper: Federal Plastics Registry**.

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

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economy, and the elimination of plastic waste. We need to be intentional and thorough in designing the steps we take along the way.

Sincerely,

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