

August 30, 2023

Tracey Spack
Director, Plastics Regulatory Affairs Division
Environment and Climate Change Canada
351 Saint-Joseph Blvd.
Gatineau, Québec, K1A 0H3
Submitted by Email: plastiques-plastics@ec.gc.ca

Re: APRA Response to Pollution Prevention Planning Notice for Primary Food Plastic Packaging

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 over 30 years, with a focus on the facilitation of sustainable plastics recycling and the diversion of plastics from landfills. 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 **Pollution Prevention Planning Notice for Primary Food Plastic Packaging**, as published on August 1, 2023. APRA has recently [submitted comments](#) to the Federal government on the *Technical paper: Federal Plastics Registry and Recycled content and labelling rules for plastics*. Both proposed approaches by the Federal government have policy implications that could impact our members' businesses as well as have negative environmental outcomes. Below, APRA is providing comments on areas of relevance to our members' industries and expertise, in alignment to *Section 7.0 Discussion questions* in the *Consultation document for Pollution prevention planning notice for primary food plastic packaging: Targets for reduction, reuse, redesign, and recycled content*.

1. **Are there any other objectives and/or factors the Government of Canada should consider as it develops an approach to address primary food plastic packaging? If so, what are they and why are they important.**

It is imperative that the Government of Canada focus on Circular Economy versus the elimination of primary food plastic packaging. In alignment with APRA's vision and mission statements, APRA

strongly believes that the objectives outlined in the proposed pollution prevention plans and other related regulations can be achieved by supporting a circular economy. In this approach, plastics can be utilized as an ongoing resource as feedstock for new plastic products, instead of becoming waste; ultimately reducing emissions by using recycled plastics.

Investment in Canada's Circular Economy is also a critical factor. While there is currently work in progress centered around packaging design that focuses on recyclability and incorporating post-consumer resin (PCR) into packaging, APRA currently notes that there is a gap in recycling rates across the country. These low recycling rates may be partially due to a lack of investment in the infrastructure, innovation, and mechanisms required to support mechanical recycling, as well as the scale-up of advanced recycling technologies. Furthermore, municipalities are responsible for the basic infrastructure to support these processes, and therefore, require additional support to assist with the provision of standardized, consistent processes for recycling in provinces, such as Alberta. Such investment would result in robust recycling systems in conjunction with an adequate supply of recycled content in the market. It is also important to note that, as a critical first step, investment for conducting the appropriate scientific research in innovative manufacturing and recycling technology is required for advancing such policies.

Through the establishment of new funds, financial programs, and corresponding incentives, the Government of Canada can work with industry to drive a circular economy while attracting recycling projects and advanced facilities and systems; thereby, ultimately increasing the supply of recycled content in Canada.

2. What are the potential impacts to supply chain relationships, costs, and other obstacles associated with this approach?

The proposed P2 plan targets grocery retailers, however, its implications span well beyond this entity. Manufacturers and distributors of plastic food packaging will be significantly impacted as they are responsible to meet the new standards and implement the proposed changes. Therefore, the proposal cannot be solely focused on retailers.

The implementation of the P2 plan may result in several unintended negative consequences as a result of disrupting the existing growing plastics circular economy in Canada. Given this vast array of affected stakeholders, APRA believes that an impact assessment should be conducted which considers the consequences of the proposed framework for **all** industries impacted, which include, but are not limited to plastic resin producers, plastic manufacturers, recyclers, food suppliers and processors.

3. **What else is needed to advance reuse in grocery stores?**

A focus on circular economy requires a shift in thinking. With this concept, plastics become an ongoing resource as they are recovered, recycled, reused and recirculated. In a true plastics circular economy, the concept of single-use plastics **does not exist**. In addition, when recycled plastics are utilized in new and reusable products, this approach provides a lower carbon footprint, which in turn contributes to the Government of Canada's commitment to reducing Canada's Greenhouse Gas emissions.

With this being said, APRA believes that grocers and retailers can achieve the objectives of net zero waste by working with the full supply chain to determine the best packaging and corresponding systems to incorporate into their operations. The proposed plan outlines strict targets, outcomes and timelines, and this prescriptive approach may not be successful without flexibility and autonomy.

4. **Are there any supporting materials, such as guidance documents, tools, or awareness campaign the Government of Canada should consider developing to support industry and facilitate meeting the objectives?**

Flexibility should be provided in targets for recycled content minimums, and must be in alignment with programs focused on the steady supply of recycled content, such as the provincial Extended Producer Responsibility (EPR) programs. Targets should consider the supply and demand of available recycled content, including material utilized in food packaging. Sourcing adequate quantities of food-quality recycled resins is currently a challenge due to the complexity behind its production coupled with strict quality controls and standards, therefore the envisioned targets (which requires a significant increase in these high-quality recycled resins) is likely unachievable in the desired timeframe. APRA therefore believes that an achievable requirement for the minimum recycled content for food contact is essential. Furthermore, both non-reusable and reusable food plastic packaging containing post-consumer recycled content should count towards the targets.

Going forward, market and economic needs assessments should also be completed on an on-going basis to ensure these requirements can be adapted to reflect current supply and demand of recycled plastics, while also analyzing impacts on price and competition.

5. **Are there any undesirable consequences of moving to reuse and design for circularity versus reliance on recycling?**

Food safety and food waste are significant undesirable consequences of moving to reuse and design versus reliance on recycling. Plastic food packaging plays a vital role in protection against bacteria and other contaminants, keeping consumers safe. The shift away from plastics to alternative materials puts this protection at risk, which is an escalating concern following the arrival of COVID-19. Additionally, the recent pandemic has proven to society that plastics is an essential product for the protection of human health. Furthermore, plastic extends the shelf life of many perishable items, reducing spoilage and food waste, ultimately increasing food waste-related emissions and costs to the consumers. The proposal must consider the critical role of plastic in upholding food safety standards and minimization of food waste, using a balanced approach that considers these factors along with environmental concerns.

APRA is recommending that an overall full-cycle plastic assessment is conducted in conjunction with an environmental impact assessment to ensure that the use of alternative products is not providing unintended negative consequences as a trade-off to eliminating plastic food packaging. Current research has demonstrated that plastic results in significantly lower greenhouse gas emissions in terms of production and transportation (due to its lighter weight). Furthermore, a switch to alternative products means additional costs to grocer retailers due to product purchase and additional bureaucracy associated with the implementation of a new program. This cost is ultimately passed onto the consumer.

In addition, the implementation of the proposed reuse-refill concept presents limitations and a significant shift in consumer attitudes and behaviours; an approach that has not been widely accepted and has limitations in its applicability. Rural/remote communities must be thoroughly considered in terms of accessibility restrictions to the infrastructure required for the success of this model, and the corresponding financial impact. Given these challenges, lightweight plastic packaging remains an appropriate option. Socioeconomic dynamics may also hinder participation, especially within vulnerable populations; further disadvantaging those already marginalized. Currently, plastic food packaging provides Canadian consumers with convenient, cost-effective options for purchasing on-the-go healthy food, as food spoilage/product loss is reduced.

Practicality, inclusivity, and equitability must be balanced against sustainability before moving forward with this approach. APRA is recommending that an assessment is conducted with Canadian consumers to explore their willingness to adopt a reuse-refill model, before considering its implementation; this is in conjunction with the scientific research required to support the advancement of any policies pertaining to plastic usage.

6. **What performance metrics should the Government of Canada consider in tracking progress and evaluating success?**

The success of any program requires direct involvement with all stakeholders impacted. APRA believes the Government of Canada must first conduct all of the required assessments, including impact assessments, market and economic needs assessments, consumer assessments, and full-cycle plastic assessments before implementing any further policies regarding food plastic packaging. By remaining properly engaged with all of the stakeholders within the plastics circular chain and this specific value chain addressed in P2, the Government of Canada will be able to gather the data and feedback required along the entire program journey.

7. **Do food retailers currently consider reduction, reuse, recyclability in procurement criteria and/or contracts with suppliers?**

APRA does not have any food retailer as members; however, APRA members may either be suppliers or work with food retailer suppliers. APRA does not have any additional comments to provide regarding this question, but encourages the appropriate engagement with the food retailers directly.

8. **Is the applicability of the P2 planning notice clear? That is, is it clear what level of your corporation would be responsible for the required submissions?**

Grocery retailers do not have this level of reporting existing, and this P2 planning notice significantly increases the administrative burden on those companies. The cost associated with this increased work will inevitably land with the consumer.

The program itself has a significant administrative impact with no guaranteed environmental benefit if executed as-is. The unintended consequences as mentioned previously remain a concern for several stakeholders that will be impacted by this proposal. Thorough scientific evidence, coupled with the required assessments listed above are required in order to execute any future policy decisions.

9. **Is there any data the Government of Canada should be aware of regarding the plastic footprint of food retailers?**

As aforementioned, the Government of Canada should be aware of the full lifecycle assessment of all products working towards the best environmental and economic outcome. Eliminating plastic is not the same as plastic pollution prevention. The very act of switching out packaging for a heavier, reusable product immediately increases costs to manufacturers, grocery retailers,

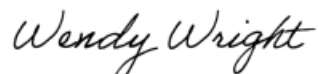
consumers, and significantly increases greenhouse gas emissions. APRA encourages the Government of Canada to use science-based evidence and life cycle assessment data in order to create policy with the greatest environmental impact.

Conclusion

APRA and its members and partners are committed to finding solutions to manage and recycle plastics and are working to realize the value of the circular economy and keep plastics out of the environment. While APRA realizes the importance behind the zero plastic waste goals, it is important that any proposals are considered for the unintended consequences of shifting towards alternative products and the full implications of eliminating plastic food packaging. Not only can plastics have a lower overall environmental impact due to its manufacture and light weight, but this material also plays a vital role in protection against health concerns and food waste, and is part of a supply chain that Canadian consumers rely on for several important reasons.

Thank you for the opportunity to share this response. APRA remains 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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