



December 9, 2025

Jean Couture
Program Leader
Bureau de normalisation du Québec
Cell: 581-989-9523
jean.couture@bnq.qc.ca

RE: CAN/BNQ 3840-100 Recycled Plastic Content Products

Dear Mr. Couture,

I am writing to you today on behalf of the members of the Alberta Plastics Recycling Association (APRA). APRA is a not-for-profit organization advancing Alberta's transition to a sustainable plastics circular economy. We believe Alberta can lead the way in building a plastics circular economy—one where materials are valued, waste is designed out, and business and the environment thrive together. For more than three decades, APRA has united industry, government, and community partners to strengthen collaboration across the plastics value chain—driving both economic growth and environmental stewardship.

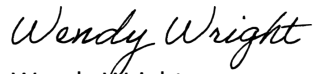
Thank you for providing the opportunity for APRA to respond to the Bureau de normalisation du Québec (BNQ) follow up on 3840-100 *Recycled Plastic Content Products* published in 2023. APRA supports many of the comments from our colleagues at the *Chemical Industry Association of Canada (CIAC) Plastics Division* in their response. In particular, one area that APRA strongly suggests requires immediate modification is around the conversion of outputs from advanced recycling to a mass basis using the mass balance system.

We reiterate the statements we made in 2023, that 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,

A handwritten signature in black ink that reads "Wendy Wright". The script is cursive and fluid.

Wendy Wright

President

Alberta Plastics Recycling Association

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