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Re: Regulations Amending the Single-use Plastics Prohibition Regulations

Thank you for providing the opportunity for the Alberta Plastics Recycling Association (APRA) to submit comments on the proposed amendments to the Single-use Plastics Prohibition Regulations published in the Canada Gazette, Part I, Volume 159, Number 51.

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. APRA has over 60 member companies who operate across the plastics value chain in Alberta, nationally and internationally.

General Statements

We support the Government's proposal to remove the prohibition on manufacture, import, and sale of single-use items for the purpose of export. This amendment recognizes that products destined exclusively for foreign markets do not contribute to domestic environmental harm and that including export in the original prohibition created unintended economic and trade consequences.

In light of this feedback, APRA is well positioned to emphasize that:

- Early regulatory clarity is essential for capital-intensive manufacturing sectors;
- Consultation timelines must align with business decision timelines, not theoretical compliance dates;
- Export access must be embedded from the outset, not corrected retroactively; and,
- Future plastics policy should prioritize predictability, lifecycle performance, and EPR alignment, rather than blunt prohibitions.
- APRA is committed to advancing a circular economy and believes bans are not part of this advancement. In a circular economy mindset, there is no “single-use” plastics since all plastics are recovered and recirculated in the economy through mechanical or advanced recycling.
- Rather than implementing bans, the government should be promoting the expansion of recycling and recovery, the integration and development of end-markets, and investments in infrastructure and projects.

Future Considerations

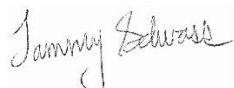
Should the Government consider future prohibitions on additional single-use plastic products, we strongly recommend that manufacture, import, and sale for the purpose of export be excluded from the outset. Regulating products not destined for the Canadian market does not advance domestic environmental objectives and risks repeating the disruption experienced under the current framework.

Conclusion

We appreciate the Government’s willingness to undertake this consultation and to refine the Regulations considering implementation experience. We encourage continued early and sustained engagement with industry to ensure future measures are structured appropriately from the outset and avoid unintended economic disruption.

We would welcome the opportunity to discuss further.

Sincerely,



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