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RE: Consultation Submission on the Proposed Federal Plastics Registry
Email to: plastiques-plastics@ec.gc.ca

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[RE: Consultation Submission on the Proposed Federal Plastics Registry](#)ⁱ

It is imperative that the Government of Canada reduce plastic waste and pollution. The proposed federal plastics registry should support [Phase 2](#)ⁱⁱ of the Canada-wide Strategy on Zero Plastic Waste and Action Plan, which centres on reducing plastic pollution through measures such as improving consumer, business and institutional awareness to prevent and manage plastic waste responsibly. While the policy's primary focus is on creating an accessible registry, its overarching objective must be the utilization of the resulting data to identify ways to reduce, and ultimately eliminate, plastics in the economy.

Objectives

The federal plastics registry must clearly link how its objectives will reduce plastics. The following is an objective listed in the earlier [consultation paper](#)ⁱⁱⁱ that is tied to reducing plastics:

“Provide comprehensive and comparable information: The federal plastics registry would solicit and provide data on all major sectors of the plastics economy in Canada. This data would be comparable across jurisdictions and product categories.



This will support effective performance measurement to help maximize the effectiveness of EPR [extended producer responsibility] in achieving zero plastic waste” (p. 8).

Both the consultation and [technical papers](#)^{iv} on the federal registry conclude that the data will help achieve zero plastic waste, but the proposal needs to further explain how the federal, provincial, and/or territorial governments will act on the findings. In the case above, the policy must explain how a performance measurement from the comparative data will maximize the effectiveness of EPR. For example, are provinces and territories expected or encouraged to utilize the findings to adjust the stringency of EPR policies?

Scope

The registry only includes existing ERP programs. In a prior consultation, various [environmental non-governmental organizations \(ENGOs\)](#) note that this excludes most plastic manufactured items (PMIs) in Canada.^v Informed by the suggestions of these ENGOs and the non-profit [Oceana](#),^{vi} the registry should continue to make strides to incorporate all plastics on the market and across all sectors. It should broaden the scope of reporting companies to include:

- Waste processors
- Materials recovery facilities
- Waste haulers
- Brokers and resellers of resin and compounds
- Landfill operators
- Waste facilities
- Manufacturers
- Retailers

With the incorporation of the above list compiled by the ENGOs, the plastics registry can more adeptly support government policies to eliminate plastic waste. The broader scope will provide a comprehensive overview of plastic production, use and disposal by more accurately capturing the extent of PMIs.

Open Data and Transparency

The federal government’s plan to make data from producers available on an online platform, while protecting confidential business information (CIB), is important for transparency and citizen engagement. The earlier consultation paper mentions people will be able to obtain raw data and visualize the data in various formats and arrangements. However, the policy should further ensure that a layperson can



meaningfully obtain information and extract analyses. For example, the policy can call for a panel of experts in the public service, including scientists and statisticians, to compile annual summary reports of key findings with limited technical jargon. This can support the goal of empowering citizens to hold the government accountable by providing accessible information.

Timeline

The Government should accelerate the phased implementation approach; the various ENGOs provide a suitable timeline. First, the Government needs to establish a standardized system since provinces have existing, yet vastly different EPR programs. Subsequently, producers should be required to report on plastics they place on the market by the end of 2024. By the following year, producers should report on the end of life of their products, such as the total amount that has been reused, refurbished or recycled. By 2026, companies that handle plastic should report on the amount that has been discarded.

Urgency to Reduce Plastics

The proposal's purpose is to create a federal plastics registry from plastic producers' annual reports on their plastic contributions to the Canadian economy. Within this agenda, the policy must more clearly underscore the link between the objectives of reporting data and achieving zero plastic waste. How will the data help achieve this pertinent goal of zero waste? More importantly, how can the registry go beyond promoting the responsible collection and management after the introduction of plastics into the Canadian economy, and support the reduction of plastic production in the first place?

Thank you for this consultation opportunity.



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¹ Environment and Climate Change Canada. (2023). Share and view ideas: Development of a proposed federal plastics registry for producers of plastic products. <https://www.canada.ca/en/environment-climate-change/services/managing-reducing-waste/consultations/technical-paper-registry.html>.



¹ Canadian Council of Ministers of the Environment. (2020). Canada-wide action plan on zero plastic waste: phase 2. PN 1606. Approved by CCME 23 July 2020. https://ccme.ca/en/res/ccmephase2actionplan_en-external-secured.pdf.

¹ Environment and Climate Change Canada. (2022). *Consultation paper: a proposed federal plastics registry for producers of plastic products*. <https://www.canada.ca/content/dam/eccc/documents/pdf/cepa/consultationplasticproductreg/Federal%20Plastic%20Registry%20Consultation%20Paper%20EN.pdf>.

¹ Environment and Climate Change Canada. (2023). *Technical paper: Federal Plastics Registry*.

<https://www.canada.ca/en/environment-climate-change/services/canadian-environmental-protection-act-registry/technical-paper-federal-plastics-registry.html>.

ⁱ Environment and Climate Change Canada. (2023). Share and view ideas: Development of a proposed federal plastics registry for producers of plastic products. <https://www.canada.ca/en/environment-climate-change/services/managing-reducing-waste/consultations/technical-paper-registry.html>.

ⁱⁱ Canadian Council of Ministers of the Environment. (2020). Canada-wide action plan on zero plastic waste: phase 2. PN 1606. Approved by CCME 23 July 2020. https://ccme.ca/en/res/ccmephase2actionplan_en-external-secured.pdf.

ⁱⁱⁱ Environment and Climate Change Canada. (2022). *Consultation paper: a proposed federal plastics registry for producers of plastic products*.

<https://www.canada.ca/content/dam/eccc/documents/pdf/cepa/consultationplasticproductreg/Federal%20Plastic%20Registry%20Consultation%20Paper%20EN.pdf>.

^{iv} Environment and Climate Change Canada. (2023). *Technical paper: Federal Plastics Registry*.

<https://www.canada.ca/en/environment-climate-change/services/canadian-environmental-protection-act-registry/technical-paper-federal-plastics-registry.html>.

^v Wirsig, K., Olivastri, B., MacDonald, E., Bain, L., Gue L., Alfred E., de Leon, F., Speranskaya, O., & Ans., C. (2022). *RE: Consultation papers*. <https://environmentaldefence.ca/wp-content/uploads/2023/02/ENGO-comments-on-plastics-recyclability-and-registry-1.pdf>.

^{vi} Merante, A. (2022). *Comments on improving recyclability and compostability labelling & the federal plastics registry*. https://oceana.ca/wp-content/uploads/sites/24/2022/10/Recyclability-and-Registry_final.pdf.

