October 07, 2022

COMMENTS ON IMPROVING RECYCLABILITY AND COMPOSTABILITY LABELLING & THE FEDERAL PLASTICS REGISTRY

Presentation to Environment and Climate Change Canada

OCEANA Protecting the World's Oceans

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Tracey Spack
Director, Plastics Regulatory Affairs Division
Environment and Climate Change Canada
351 Saint-Joseph Boulevard
Gatineau, Quebec K1A 0H3

RE: Oceana responses to questions in the consultation papers: *"Towards Canada-wide rules to strengthen recycling and composting of plastics through accurate labelling"* and "*A proposed federal plastics registry for producers of plastic products"*

In support of the Government's goal of achieving zero plastic waste by 2030, Oceana Canada offers responses below to select questions posed in the consultations. The Canadian government has the opportunity with these two regulations to decrease plastic waste and pollution, support upcoming recycled content requirements and put an end to misleading and greenwashing claims related to recyclability, compostability and – we suggest – the "flushability" of products and packaging. The labelling rules should apply to all products and packaging, including business-to-business.

An area of concern that was not covered in the scope of the consultations is the possible inclusion of advanced or chemical recycling as an acceptable end market for plastic manufactured items. Oceana Canada urges the government to exclude processes known as chemical recycling or advanced recycling, as well as incinerating plastic, as forms of plastic recycling. Chemical and advanced recycling have not been proven to be effective at recycling plastic to plastic at scale and produces harmful pollution to soil, water and air.

The plastic pollution crisis has a disproportionate impact on certain populations, including Indigenous peoples, Black people, people of colour and low-income and working-class communities, who tend to live closest to polluting manufacturing and waste facilities as well as chemical and advanced recycling facilities.[1] New regulations should serve to reduce the risk to these populations and communities and support environmental justice and the right to a healthy environment. Chemical and advanced recycling are false solutions that are energy-intensive and pollute the air, water and soil, putting communities that live nearby in harm's way while requiring a steady stream of plastic waste, thereby undermining efforts to reduce plastic at the source.[2]

Responses to selected questions asked in the consultation paper, *Towards Canada-wide rules to strengthen recycling and composting of plastics through accurate labelling*

Discussion questions

Framing the issue for recyclability labelling

[1] Patel, D., Moon, D., Tangri, N., Wilson, M. (2020). All Talk and No Recycling: An Investigation of the U.S. "Chemical Recycling" Industry. Global Alliance for Incinerator Alternatives.
[2] Rollinson,A.,Oladejo,J.(2020).ChemicalRecycling:Status,Sustainability,andEnvironmental Impacts. GlobalAllianceforIncineratorAlternatives.doi:10.46556/ONLS4535; available at https://www.no-burn.org/wp-content/uploads/2021/11/CR-Technical-Assessment_June-2020_for-printing-1.pdf

1. **Are there any other objectives the government should be seeking to achieve as it develops labelling rules for recyclability?**

Yes. There are two objectives the government should consider:

i. **Recyclability labelling should serve to reduce the use of non-recyclable plastic resins in the Canadian market. The use of simple and instructive labels such as "landfill" (*en français "enfouissement"*) or "garbage" (*en français "déchet"*) will disincentivize non-recycled resins, and mixed material products (paper and plastic), helping the government establish reliable, Canadian sources of post-consumer resins that can be incorporated into plastic products and packaging as recycled content.**

ii. **Effective recyclability labelling should seek to reduce the use of harmful and hazardous additives such as perfluoroalkyl and polyfluoroalkyl substances (PFAS), brominated flame retardants (BFRs), and bisphenol A (BPA) that have been found in the manufacturing and recycling of in plastic products.[3] These additives hinder recyclability and have human health consequences in their manufacturing**

2. **Is there more granular data the government should be aware of regarding outcomes of specific kinds of plastic items or packaging in the recycling stream?**

Oceana Canada recommends that at least 80 per cent of the material sent for processing should be available as recyclate for new products. This is important because the government needs to know whether plastic materials collected are turned into recycled plastic flakes and pellets, ready for incorporation into new plastic products. Additionally, there must be a mechanism to ensure that material sent for processing is actually turned into recyclate. The proposed national plastic registry supports the need for more refined and comprehensive data on plastic manufactured items at all lifecycle stages.

5. **What is the process and timeline for designing and implementing changes to labelling (for example, lifespan, costs, marketing considerations and implementation timelines)?**

The government must develop a standardized labelling system applicable to all plastic products by the end of 2024 to achieve their goals of zero plastic waste by 2030. Currently, there is no data on the full life cycle of plastic waste, which is comprised of nearly 50 per cent packaging, and there is no mechanism to optimize waste management streams to build reliable stocks of recyclate to meet Minimum Recycled Content Standards. The new regulations must come into force quickly to kick-start market changes and decrease plastic pollution.

To allow for a phase-in period, all new plastic products on the Canadian market should adhere to the new recyclability labelling regulations by the end of 2026.

6. **Is there any other data the government should be aware of regarding the accuracy of recyclability labelling on plastic packaging or other product categories?**

[3] **IPEN. 2022. "How plastics poison the circular economy."**

The government should review guidance on CT-2022-001: the Commissioner of Competition and Keurig Canada Inc.,[4] which outlines the consequences of unsubstantiated environmental claims on plastic products. The Competition Bureau recently settled a case on greenwashing related to the recyclability of coffee pods[5] and has issued a warning to companies about the illegality of making unsubstantiated environmental claims on packaging.[6] Misleading labelling can be used intentionally to sell a product, and labelling rules can help stop this practice. Greenwashing with the use of words such as "eco-friendly" and "green," while having no environmental benefit was deemed illegal in Canada in 2017,[7] however, these terms and labels are still ubiquitous today. Confusion around labelling, whether intentionally misleading, or simply obscure and confusing for consumers, has a significant impact on public trust and confidence in recycling and environmental policy.

7. **Are there any other factors that can impact a plastic item's recyclability beyond the factors listed above?**

Yes. New recyclability labelling regulations must be designed for ease of understanding and use by Canadian consumers, including in the criteria and evaluation of a plastic's recyclability. This will be essential for success in meeting the objectives of this regulation: increasing trust and transparency in recycling systems and increasing the recovery of economically valuable plastics. Consumers have been subjected to heavy marketing by plastic producers for decades, lack detailed knowledge of the recycling processes or end-markets of items, and are subject to varying waste sorting systems at home, in public settings and at places of work or study. Simplicity and transparency are paramount for the success of the new labelling regulations.

A plastic product's recyclability should be evaluated based on the whole product, including all attached components as sold to and used by the consumer. For example, a typical carbonated beverage container is composed of a plastic bottle, a plastic label, adhesives and a plastic cap and fastener. Many of these components are made from different resins or materials, varying in recyclability at Canadian facilities. Consumers dispose of the whole product, without disassembly, even when additional labelling advises removing components. By giving a plastic product as a whole, inclusive of all components as sold and used by consumers, a single recyclability label, the government introduces an incentive to improve design for recycling. It also avoids cases where, for example, an unrecyclable label, even if only a small component, renders an otherwise recyclable product entirely unusable.

The government should remove consumer preparation of plastic products as a criterion in the evaluation of recyclability labelling. The low recycling rates and high contamination of waste streams in major urban centres like Toronto, Montreal and Vancouver show that, on average, Canadians do not disassemble or wash plastic products before choosing between garbage, recycling or compost bins. The government should assume consumers will not pre-process products and packaging, including disassembly, before discarding them. Therefore, products need to be designed effectively to enter the recycling stream as they are sold.

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[4] See https://decisions.ct-tc.gc.ca/ct-tc/cdo/en/item/518827/index.do
[5] See https://www.canada.ca/en/competition-bureau/news/2022/01/keurig-canada-to-pay-3-million-penalty-to-settle-competition-bureaus-concerns-over-coffee-pod-recycling-claims.html
[6] See https://www.competitionbureau.gc.ca/eic/site/cb-bc.nsf/eng/04607.html
[7] See https://www.canada.ca/en/competition-bureau/news/2017/01/not-easy-being-green-businesses-must-back-up-their-words.html

8. **What kinds of information would make it easier for individuals to prepare and sort plastics for recycling adequately?**

All plastic packages and products should include one of two simple labels that clearly tell the user where to discard the item at end of life: "Recycling" (with chasing arrows if desired) and "Waste." We do not believe any plastic should be labelled compostable at this time.

The government should design clear recyclability labelling and standardized language to counter years of greenwashed marketing that has contributed to Canada's poor eight per cent plastics recycling rate.[8] Further, consumers should not need to prepare plastic products to improve their recyclability. The onus to create a recyclable product should lie with the producers and manufacturers. Canadian consumers have been subjected to misleading and undefined language on products that make them appear to be recyclable when too often they are garbage, including terms such as "green," "bio," "recyclable," "degradable," "biodegradable," "flushable," "plant-based," "natural" and "organic." This unregulated language has led to confusion among consumers as various waste disposal streams emerged over the years, buying habits changed, and interest in sustainability increased. Plastic products should only bear recycling labels when waste disposal options for those products are commonly offered in homes and public settings, without qualifying statements like "where facilities exist" or "check locally."

Specifically regarding the label "flushable," Oceana Canada urges the government to open a further consultation on labelling products containing plastic as flushable. "Flushable" is yet another term that marketers use to make consumers think that single-use plastic products are eco-friendly and safe for the environment. Products such as wipes and cloths containing polymers are marketed as flushable even though they do not degrade in municipal wastewater treatment facilities, causing clogs in drains and damaging infrastructure,[9] Further, because the polymers survive treatments intended to process wastewater, not plastic, they are likely a source of micro- and nanoplatic pollution in freshwater and marine environments.[10]

The regulation should bar the use of recycling symbols, such as the chasing arrows and any resin code sitting within a triangle, in company logos and branding on products that do not meet recyclability criteria.

10. **What kind of design features on plastic items or information on labels would be most effective in helping strengthen public trust in recycling systems?**

Labels must be as simple and comprehensive as possible. Oceana Canada recommends a labelling requirement for plastic products and packaging that tells consumers what to do with the material at end of life: place it in a recycling bin or a waste/garbage bin.

Framing the Government's commitment on recyclability labelling

13. **Does the regional market breakdown reflect the current situation in Canada? Are there alternative ways to establish 80% population thresholds?**

[8] See https://www150.statcan.gc.ca/n1/daily-quotidien/220323/dq220323f-eng.htm
[9] Orr, B.,Karadagli, F.,(2018), "Effects Of Flushable Products On Wastewater Infrastructure And Natural Aquatic Environments," Report to Fisheries and Oceans Canada.
[10] See: https://www.sciencedirect.com/science/article/pii/S2666445321000039

For plastic products to be labeled "recyclable" or "recycling," curbside recycling programs should be available for at least 80 per cent of Canadian households or covered by a deposit-return system in each proposed region. Additionally, there must be a high degree of confidence that the plastic product will be recycled, not diverted to waste disposal after being collected at the curb. The evaluation of recyclability should include:

i. **Displacement of raw materials in new products,**
ii. **An energy-efficient or least carbon-emitting method of production,**
iii. **Recovery of at least 80 per cent of the input waste material,**
iv. **Avoidance of toxic emissions or pollutants to the soil, air and water; and**
v. **Absence of additives that prevent the safe conversion of plastic material (e.g., PFAS, phthalates, bisphenols, dyes and brominated flame retardants).**

The regional breakdown proposed is acceptable and accurately captures urban, rural, remote and northern communities in Canada.

14. Do companies currently identify what is collected for recycling when developing recyclability labels? If so, how?

Plastic manufacturers and producers do not, by and large, identify what is collected for recycling when developing recyclability labels as evidenced by qualifying statements such as "where facilities exist" or "check locally" and by Canada's overall low recycling rate of eight per cent.[11]

17. What kinds of information should be sought as part of the initial survey and assessment of what is accepted for recycling across Canada?

The government needs to get an accurate and clear picture of the end-of-life of all plastics in Canada through consultation with important stakeholders. It should consult with community recycling centres (CRC), producer responsibility organizations (PRO), material recovery facilities (MRF) and mechanical recyclers to ground truth what plastic materials are being accepted and actually recycled. These stakeholders must also identify the obstacles they face, such as contamination and lack of infrastructure or capacity. As part of this consultation, the government should investigate what happens to plastic bales and scrap exported to the United States. This should include what happens to material from Canada that is discarded from U.S.-based sorters and processors, as well as how much plastic is being exported beyond the U.S, including in poorly sorted bales.

The federal government must gather information on hazardous substances added to plastic manufactured products by producers – information on the impact of those additives to human and environmental health, and the impact of those additives to safe and effective recycling collection, processing and production of new products. The use of a growing range of hazardous substances in plastic packaging and manufactured products is a significant and well-known obstacle to effective recyclability labelling, recycling and recycled content. However, there is currently no transparency or requirement for manufacturers to provide this information to consumers or recyclers.

[11] **Deloitte & Cheminfo Services Inc. 2019. "Economic study of the Canadian plastic industry, markets and waste. Environment and Climate Change Canada."**

18. Are there any other factors the government should consider in developing an approach to determine whether a North American end market for a particular plastic item is reliable?

The government must refine the criterion related to "reliable end markets" to focus on the processed material (e.g., rPET or rHDPE) and not the value of the scrap that is found earlier in the process (e.g., bales). The key question is not whether plastic scrap can be sold on a market, but rather whether discarded plastic is turned into recyclate and used in the manufacture of new plastic products. Plastic scrap bales are sold for export for purposes other than recycling into new products (e.g., burning in cement kilns, landfill and other environmentally harmful disposals), and mixed bales are sold even though some or most of the material in the mixed bale cannot be effectively sorted and processed into new plastic products. Therefore, the market value of the bale is not relevant in determining whether a material is properly recyclable. We propose that the only useful measure is to determine whether the recyclate is used at the post-processing stage in the production of new products.

Plastic products have limited recyclability, even with the best processes, with decreasing quality over time. In determining recyclability and labelling, the government should consider both the fact that plastics are harmful and should ultimately be phased out for single-use packaging and products, and how to incorporate and convey 'reusability' for products.

19. Are there any particular categories of plastics that likely do not have North American end markets? Why?

Clear and white HDPE and PET bottles are the most likely plastics to be recycled with reliable end markets for the processed polymers.[12] All other types of plastic scrap do not appear to have reliable demand to match the volume of materials that are discarded, even if recycling is theoretically possible and performed on a small scale. Proper labelling could boost the recovery rate of the valuable resin scrap while disincentivizing the use of materials that cannot effectively be recycled.

Framing the issue for compostability labelling

21. Is there any data on end-of-life outcomes for compostable plastics and other types of biodegradable or degradable plastics the government should be aware of as it develops labelling rules?

No plastic should be labelled compostable unless it is collected and accepted for composting according to the criteria being proposed for recyclability. For example, 80 per cent of the population must have access to a compost collection system for "compostable" plastics in each of the five proposed regions. Currently, there are very few municipal composting programs that accept "compostable" plastics - even plastics that conform to one of the two standards proposed in the discussion paper. The vast majority of "compostable" plastic packaging used for food will end up in the waste stream and undermine efforts to divert food waste and organics from landfill or incineration.

[12] Environmental Defence. 2022. Canada's Zero Plastics Packaging Waste Report Card.

22. Are there any other objectives the government should be seeking to achieve through compostability labelling rules? If so, what are they and why are they important?

Composting is a regenerative process that recycles valuable organic nutrients into the soil and should not be viewed as a form of disposal for low-value, single-use and unnecessary products. To protect the environment from plastic contamination, the government should not allow the use of the term "compostable" for any kind of plastic. Composting plastics requires specialized facilities and still leaves micro- and nano-plastic particles behind that contaminate soil and contribute to plastic pollution in soil, aquatic environments, the air and even the food web.[13] Plastics marketed as compostable are polluting the environment after leaving Canadian facilities and will continue to do so if they are exempt from the proposed regulation.

Key elements of recyclability and compostability labelling rules

24. Which of the above approaches for the kinds of recyclability claims that should be subject to labelling rules (1, 2, 3) should the Government adopt, and why? Is there another approach the Government should adopt instead?

The government should adopt approach 3 as it is the most comprehensive approach to labelling proposed in the consultation and would best support the government's goals of increasing trust and transparency within waste management.

> **"Approach 3 would apply to any claim on a label that is related to recyclability. This could include those outlined in approaches 1 and 2, as well as the use of terms such as "recyclable," "recycle this product" or qualified terms such as "recyclable where facilities exist," as well as other terms, expressions or symbols that communicate whether a product is recyclable, or that otherwise urge consumers to recycle something."**

Additionally, Oceana Canada strongly recommends a labelling system whereby producers must label their products and packaging according to what should be done with them at end of life: place them in the garbage or recycling. The government should also expand the approach to capture all strategic market terms and symbols that currently add to consumer confusion about where to discard products and packaging at end of life.

25. If an obligatory system is adopted, what should the government consider in order to minimize burden on industry while maximizing environmental outcomes (for example, appropriate timelines, cumulative impacts of different labelling requirements)?

To achieve the goal of zero plastic waste by 2030, the government must adopt an obligatory system as quickly as possible and should not consider burdens on the plastic industry when developing this system. Plastic manufacturers and producers have been provided the data and opportunity to create products that do not end up in landfill or the environment for decades. To date, they have failed to create recoverable plastic products within Canada's waste

[13] **See https://www.foodnavigator.com/Article/2022/09/13/from-lettuce-to-insects-to-fish-research-investigates-how-nanoplastics-can-move-up-the-food-chain#:~:text=%E2%80%9COur%20results%20show%20that%20lettuce,and%20accumulated%20in%20the%20leaves.**

management infrastructure that support a circular economy and have failed to keep plastics out of the environment.

A mere eight per cent of Canada's waste is recycled[14] and the global rate is only nine per cent.[15], [16] We cannot recycle our way out of the plastic disaster. More than 90 per cent of Canadians support the government in reducing plastic packaging and support methods of packaging reduction beyond recycling.[17]

> **26. Are there any other kinds of plastic items that may warrant special rules or exemptions from labelling rules under an obligatory system? Why?**

No plastic items should be excluded from the labelling rules. No matter what the item is, the user will need to know what to do with the product at end-of-life.

Oceana Canada strongly rejects the suggestion of exempting certified compostable products from obligatory recyclability labelling. So-called compostable products and packaging, even those certified by a third party, must be labelled with clear information that they are not recyclable. Products that act, feel and look like plastic cause confusion among consumers and will lead to contamination of plastic recycling without clear and specific labels that direct consumers not to dispose of them in recycling bins.

> **27. What should be the minimum standards to ensure consumers can easily access and use the information on a label (e.g., size, font, location on the package, text size, required symbols)? Why?**

Labelling should meet all accessibility requirements within the Government of Canada to ensure proper comprehension of the provided information. Labelling should be tested and evaluated in each region to ensure comprehension and accessibility. Additionally, comprehensive communication and promotional campaigns about the labelling, with detailed information available about its meaning, should be funded by plastic manufacturers. As noted above, the government should implement a simplified system that requires producers to label their products and packaging according to what should be done with it at end of life: placed in recycling or garbage.

> **28. Are there any other considerations besides components and regions that may require qualified recyclability information?**

We strongly recommend the government avoid qualified recyclability information. If a portion of the plastic packaging is not detachable as part of the regular use and is not recyclable, the full package should be labelled as going into the garbage bin. If a certain type of material is recyclable in one area of the country but does not meet the population criteria, separate communications – through a PRO, municipality, or retailer – should be provided to ensure

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[14] Deloitte & Cheminfo Services Inc. 2019. "Economic study of the Canadian plastic industry, markets and waste. Environment and Climate Change Canada."
[15] Geyer, R., Jambek, J. R., and Lavender Law, K. 2017. "Production, use and fate of all plastic ever made." Science Advances. Vol. 3. Issue 7. doi: 10.1126/sciadv.1700782
[16] Statistics Canada. (2019). Materials diverted, by type. Table: 38-10-0034-01.
[17] Oceana Canada. 2022. ABACUS DATA.

appropriate discarding of the material. A national labelling system must be simple and not deal with exceptions.

> **30. Should there be any criteria for determining whether a third-party certification is adequate to ensure compostability in Canadian composting facilities? If so, what should be the criteria and why?**

Certification is not relevant to the labelling rules. Compostability should be based on real-world outcomes, not on whether a material is theoretically compostable under highly specific conditions. The criteria should be based on whether the material is collected and processed as compost and accessible to Canadians.

> **32. Are there any other principles or other important considerations the government should take into account in developing rules for compliance and compliance verification?**

There must be clear public transparency for the labelling system, an understandable mechanism for public inquiries and challenges, and a penalty and cost for manufacturers associated with breaking the rules to serve as a deterrent.

> **36. If a technical committee of experts is established, what should be its composition and what should be its role in the development of tools and guidance?**

A technical committee of experts should be comprised of PROs, CRCs, MRFs, environmental not-for profits that specialize in plastic pollution, public/plastic/toxicology health experts, consumer groups, accessibility organizations and supply chain experts from across Canada. The committee should focus on ground truthing and providing practical advice to the government in developing recyclability labelling criteria to establish reliable domestic and foreign end-markets of plastic products.

> **38. Are there any other performance metrics the government should consider in tracking progress and evaluating success?**

Developing a comprehensive national plastics registry is critical to collect the year-over-year data needed to evaluate the success of the labelling regulations.

Responses to selected questions asked in the consultation paper: *A proposed federal plastics registry for producers of plastic products*

Why a federal plastics registry is needed

> **1. What objectives and potential benefits do you see from a federal plastics registry, and are they contingent on any conditions being met (for example agreements with provinces and territories)?**

As proposed the registry must be broadened to include:

- **Resin producers and importers**
- **Waste processors**
- **Material Recovery Facilities**
- **Waste haulers**

- **Brokers**
- **Landfill operators**
- **Waste facilities inclusive of chemical recycling, advanced recycling and incineration facilities like energy-from-waste**
- **Manufacturers**
- **Retailers**

The registry is currently focused on existing Extended Producer Responsibility (EPR) programs and excludes the vast majority of "plastic manufactured items" (PMIs) in Canada today. EPR programs differ dramatically across the country, with variations in PMIs covered, markets, and level of reporting. The *Canadian Environmental Protection Act* listing covers PMIs, which can pollute at any point along the supply chain, from resin and additives to industrial components, to clothing, scrap, and recyclate. The universe of PMIs goes far beyond post-consumer plastic packaging, which is the most likely to be covered by an EPR program today.

Without this change, the registry will not support eliminating plastic waste. Nor will it be able to monitor changes in plastic production, use, disposal and export, or evaluate targeted waste reduction programs, such as refill and reuse. A fully comprehensive registry is required to support the government's goal of increasing trust and transparency in waste management.

Potential key elements of a federal plastic registry

2. **Are the product categories described in this document characterized accurately? For example, should any sub-categories be separated and included as product categories in their own right, or should any categories be combined?**

A two-tiered level of data reporting should be applied to the registry. The current model (based on EPR systems) lacks the critical data necessary for evaluating the success of zero-waste initiatives and the goal of increasing transparency and trust in the waste management system.

Importers, producers, manufacturers and retailers of plastics should be required to provide detailed annual data on the pre-consumer/pre-use phase of plastics:

- **Common Product name (e.g., cup, bottle, lid, electronic device, overwrap, etc.)**
- **Resin type**
- **Percentage of recycled material in the resin used to manufacture the product**
- **Units of product produced and/or weight**
- **Category of plastic according to waste categorization (e.g., packaging, automotive, agricultural, electronic, construction, etc.)**
- **Presence of multiple plastic resins**
- **Presence of mixed materials (e.g., paper, metal, glass)**
- **Manufacturing facility**
- **Country of origin**
- **Province of sale**
- **Presence of additives (e.g., PFAS, bis-A, flame retardants, etc.)**
- **Single-use plastic (by weight or unit) is displaced through the refill/reuse of the package or product that is the subject of the report. Optionally, producers could report here on the displacement of single-use plastics by products/packaging made of non-plastic materials.**

Landfills, waste facilities, recyclers, haulers, brokers and exporters should be required to provide annual data on the material they process in the post-use phase of plastics:

- **Category of plastic according to waste categorization (e.g., packaging, automotive, agricultural, electronic, construction, etc.)**
- **Presence of multiple plastic resins**
- **Presence of mixed materials (e.g., plastic attached to paper, metal, glass)**
- **Province/territory of collection**
- **Units of product or weight (by type) collected/hauled**
- **Amount (by weight) and type:**
    - **entering the sorting/processing facility**
    - **sold for further processing or manufacture (including chemicals produced from depolymerized plastics)**
    - **amount disposed (on- or offsite)**
- **Amount (by weight) and type incinerated for energy recovery**
- **Amount (by weight) and type Incinerated without energy recovery**
- **Amount (by weight) and type burned as fuel**
- **Amount (by weight) and type landfilled**
- **Amount (by weight) and type exported**
- **Country of destination for exports**
- **Whether the Prior Informed Consent procedure under the Basel Convention was applied to the exported material.**

Implementation

16. How quickly after Phase 1 data is required to be reported could producers provide the information outlined above for Phases 2-4?

The data reporting system must be in place by 2024. The proposed timeline of 2028 for implementation of the national plastics registry is too long, given the urgency of the plastic waste crisis and the role of the registry in supporting the Government's 2030 zero waste goal. The government must shorten the proposed timeline and ensure the data is standardized across all entities and reporting regions and the reporting system must be open-access and barrier-free.

All companies that import, produce or sell plastics in Canada should report what they are importing, producing and selling by 2024 at the latest. By 2025, any company that reports on any provincial EPR should report on the end-of-life of their products in the registry. This reporting should be aligned with what the companies are already reporting to the provincial systems and augmented as necessary. By 2026, the registry should have full reporting from all companies that handle plastic that has been discarded. Entities with this information or reporting capacity should contribute to the registry in advance of target dates. All data must be audited by a third party for validity at the cost of the reporting entity.

Thank you for considering our feedback when moving forward with these regulations. We look forward to supporting strong regulations that work towards ending plastic waste and protecting our oceans.

Kind regards,

Anthony Merante
Plastics Campaigner, Oceana Canada

About Oceana Canada

Oceana Canada was established as an independent charity in 2015 and is part of the largest international advocacy group dedicated solely to ocean conservation. Oceana Canada has successfully campaigned to end the shark fin trade, make rebuilding depleted fish populations the law, improve the way fisheries are managed and protect marine habitat. We work with civil society, academics, fishers, Indigenous Peoples and Environment and Climate Change Canada to return Canada's formerly vibrant oceans to health and abundance. By restoring Canada's oceans, we can strengthen our communities, reap greater economic and nutritional benefits and protect our future.