



February 13, 2024

Tracey Spack, Director
Plastics Regulatory Affairs Division

Environment and Climate Change Canada
351 Saint-Joseph Blvd
Gatineau QC K1A 0H3

Re: CME's comments on the notice of intent to issue a section 46 notice for the Federal Plastics Registry

On behalf of Canadian Manufacturers & Exporters (CME) and our member companies from across Canada, we are pleased to provide our comments on the notice of intent to issue a section 46 notice for the Federal Plastics Registry.

The manufacturing industry accounts for 10 per cent of Canada's GDP, two-thirds of our goods exports, and 1.8 million high-paying jobs across Canada. CME also leads the Canadian Manufacturing Coalition (CMC), a group which brings together Canada's manufacturing sector associations. Canadian manufacturers believe strongly in environmental stewardship and continuously improving environmental performance. CME and the industry are committed to working with government to minimize the impact of plastic on the environment and have been a strong proponent of taking measures to ensure reducing, reusing, and recycling of plastic material, and many of CME's members are strong contributors and supporters of extended producer responsibility (EPR) programs across Canada.

It is important to note that plastics are ubiquitous in industry, often acting as vital components necessary to produce countless manufactured goods and protect consumer health and safety. While Canadian manufacturers share the federal government's commitment to reducing plastic waste in our environment, doing so requires a comprehensive framework and a feasible implementation process that's inclusive of industries of all sizes. Increasing the human resources and financial cost to these manufacturers at a time when they are facing increasing pressure to justify their Canadian operations will lead to lost investment and the offshoring of production to other jurisdictions. To that end, the CME urges consideration of the following concerns:

1. Several organizations already collect data related to plastics manufacturing and processing under the National Pollutant Release Inventory (NPRI). Because supplier component information is difficult to collate and requires additional time and resources, an expansion of the NPRI would be seen as a viable alternative to this registry since it would accomplish much of what is being requested without creating a novel registry program.

2. The purchase of an assembly or sub-assembly containing plastics seldom comes with details relating to material types and weights for individual components. Thus, this poses a significant challenge for manufacturers to report on each plastic component they purchase.
3. The registry risks a low response rate or inaccurate information from suppliers responsible for providing data at the component/part, sub-component part, assembly, architecture/platform level of a good.
4. Clarification of key definitions such as 'single-use and disposal items' and 're-usable packaging' will help avoid confusion and better define regulated items.

Thank you for the opportunity to comment. CME would be pleased to meet with you along with our member companies to provide our support, ideas, and insights as you review the federal plastics registry. Please do not hesitate to contact us if we can be of further assistance on this or any other issue.

Sincerely,

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Haroun Mansuar
Manager, Environment & Energy Policy
Canadian Manufacturers & Exporters