January 25, 2021

The Right Honourable Justin Trudeau, P.C., M.P.
Prime Minister of Canada
80 Wellington Street
Ottawa, ON K1A 0A2

Dear Prime Minister:

We write to respectfully express our significant concerns with the Federal Government’s intention to list all plastic manufactured items under the Canadian Environmental Protection Act Schedule 1: List of Toxic Substances.

As an industry, we strongly agree plastic waste does not belong in our environment. It should be continuously reused in the economy. We believe government and industry both have important roles to play, and we need to work together on the management systems, infrastructure and technologies to address post-consumer plastics.

We are committed to advancing new ways of doing business that encourage plastic reuse on a global scale. We are developing new uses for recycled plastic and building infrastructure to realize a future where plastics are continuously recycled and transformed into new products. Establishing a circular economy for plastics is our goal.

Unfortunately, the current federal policy approach to managing plastics runs counter to our shared circularity, sustainability, and climate change goals.

Plastic is a safe and inert material that is critical to the production of thousands of health and consumer items that enable our modern way of life. These products include everything from heart valves to personal protective equipment to essential food packaging to the syringes that will administer the COVID vaccine.

Plastics will also be crucial in helping us achieve a low-carbon sustainable future. They are a building block of lighter more durable electric vehicles, wind turbines, solar panels and more fuel-efficient airplanes. They keep agricultural products fresher and reduce food waste. Given they are lighter and more flexible than alternatives, plastic packaging offers a lower carbon footprint than alternatives and leads to reduced transportation emissions.

We are committed to sustainability goals and to establishing a circular economy for plastics based on the following six principles:

- Improved product design to increase recyclability, recycled content and degradability/compostability;
- Increased access to recycling and harmonization of standards nationally;
• Improved sorting capabilities to improve quality and increase supply of post-consumer materials;
• Strengthened mechanical and advanced recycling capabilities through infrastructure and technology investment;
• Expanded end-use markets through consistent recycled content standards; and
• Expanded consumer education and incentive programs.

Collectively, we agree with the conclusion reached by Minister Wilkinson and the Environment Ministers of all of Canada’s provinces in their Action Plan on Zero Plastic Waste that: “Canadians can show global leadership by moving to a more circular plastics economy—one which captures and retains the value of plastics across their lifecycle. Working together to change how plastics are used and managed will increase prosperity and protect the environment.”

The Canadian Environmental Protection Act, 1999 (CEPA) lacks provisions for effectively regulating post-consumer wastes – regardless of material origin – and listing plastic manufactured items on CEPA Schedule 1: List of Toxic Substances is not legally or scientifically justified. It will create unwarranted stigma, cause consumer confusion, and negatively impact almost every segment of manufacturing in this country. It will also create additional obstacles that will further delay implementation and deployment of recycling technologies. The economic, trade, and reputational damage that will stem from this indefensible label on plastics is incalculable.

Utilizing CEPA as proposed undermines an Act that historically has been celebrated by industry for decision-making that has been based solely on science, evidence, formal and targeted risk-assessments, and life-cycle analyses.

We urge you to stop the proposed order to designate plastic manufactured items on CEPA Schedule 1 and, instead, work with businesses, scientists and industry leaders to develop solutions to recycle, recover, and reuse plastic waste.

By working together, and leveraging industry innovation, we can transform post-consumer plastics into a resource for continuous use while also shaping a resilient and sustainable economic recovery in Canada.

We respectfully request a meeting with you, Prime Minister Trudeau, to discuss how we can work together towards our common sustainability goals and establish a circular economy for plastics.

Yours sincerely,
**Associations**
- Chemistry Industry Association of Canada
- Canadian Chamber of Commerce
- Canadian Manufacturers and Exporters
- Global Automakers of Canada
- Automotive Parts Manufacturers’ Association
- Aerospace Industry Association of Canada
- Medtech Canada
- Automate Canada
- Canadian Association of Mold Makers
- Canadian Hardware & Houseware Manufacturers Association
- Canadian Tooling & Machining Association
- IPEX North America
- Alberta’s Industrial Heartland Association
- Canadian Association of Petroleum Producers
- Alberta Plastics Recycling Association
- Resource Works Society
- Surrey Board of Trade
- Canadian Association of Oilwell Drilling Contractors
- Outdoor Power Equipment Institute Canada
- American Chemistry Council
- AMERIPEN
- Western Plastics Association
- National Electrical Manufacturers Association
- Wire and Cable Industry Suppliers Association
- National Association of Chemical Distributors
- Plastics Pipe Institute
- Communications Cable & Connectivity Association
- Polyisocyanurate Insulation Manufacturers Association
- Chemical Fabrics & Film Association
- International Brotherhood of Boilermakers
- Flexible Packaging Association
- Extruded Polystyrene Foam Association
- Lubrizol

**Companies**
- Dow Canada
- NOVA Chemicals Corporation
- BASF Canada
- Imperial Oil Ltd.
- INEOS Styrolution
- Pyrowave
- Kal-Polymers
- Husky Injection Molding Systems, Ltd.
- Wittman Battenfeld Canada
- Canada Colors and Chemicals
- Winpak Ltd.
- Dyne-A-Pak
- Hymopack
- Les Industries Polykar Inc.
- Polytainers Inc.
- Malpack Ltd.
- Dart Canada Inc.
- CKF Inc.
- Wentworth Technologies
- Layfield Group
- Inteplast Bags & Films
- PolyExpert
- Pack All Manufacturing
- Tempo Plastics Limited
- Berg Chilling Systems Inc.
- Oakville Stamping & Bending (OS&B)
- Peel Plastic Products Limited
- Canuck Compounders
- GN Thermoforming Equipment
- Colortech Inc.
- Flexible Films
- Scotia Recycling Ltd.,
Carbon Copy (c.c.) to:
The Honourable Chrystia Freeland, Deputy Prime Minister and Minister of Finance
The Honourable Jonathan Wilkinson, Minister of Environment and Climate Change
The Honourable Seamus O’Regan, Minister of Natural Resources
The Honourable François-Philippe Champagne, Minister of Innovation, Science and Industry
The Honourable Mary Ng, Minister of Small Business, Export Promotion and International Trade