



February 13, 2024

## Subject: Recommendations to address critical concerns Regarding the Proposed Federal Plastics Registry and Its Impact on Canadian Fruit and Vegetable Growers

Tracey Spack,

On behalf of the Fruit and Vegetable Growers of Canada (FVGC), we wish to express our concerns regarding the proposed Federal Plastics Registry under the Canadian Environmental Protection Act, 1999, for the years 2024 to 2026. As an organization committed to sustainable agricultural practices, we understand the importance of environmental stewardship. However, we believe the registry, as currently proposed, may not effectively align with our shared objectives of reducing plastic waste and may instead pose significant challenges to our sector.

The Fruit and Vegetable Growers of Canada (FVGC) have voiced significant concerns regarding the proposed Federal Plastics Registry. These concerns include the potential for undue financial and administrative burdens on growers, the risk of duplicating efforts already undertaken by provincial Extended Producer Responsibility (EPR) programs, and the broad scope and extensive reporting requirements that may overwhelm particularly small and medium-sized enterprises. Additionally, the complexity of the registry's phased implementation and the need for greater upstream involvement in the supply chain could further complicate compliance and operational practices.

In response, the FVGC has proposed alternative strategies that aim to reduce plastic waste more effectively and with less burden on growers. These include supporting innovative recycling and circular economy initiatives, implementing reusable packaging models, and promoting localized waste management solutions. These recommendations draw on successful global models and emphasize the need for a collaborative approach that leverages existing provincial programs and fosters innovation and sustainability within the agricultural sector. Through dialogue and cooperation with Environment and Climate Change Canada (ECCC) and other stakeholders, the FVGC seeks to find practical and impactful solutions to the challenges of plastic waste, ensuring the sustainability of Canada's agricultural sector while aligning with environmental objectives.



## Growers' Concerns with the Proposed Federal Plastics Registry

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The introduction of the Federal Plastics Registry by Environment and Climate Change Canada has raised several concerns among the agricultural community, particularly among fruit and vegetable growers. These concerns highlight the potential challenges and implications of the registry's implementation on the agricultural sector. Here is an overview of the key issues identified by growers:

**Undue Financial and Administrative Burdens:** *Implementing a Federal Plastics Registry would impose significant financial and administrative costs on growers and businesses, many of whom are already operating under tight margins.* These costs stem not only from the need to comply with new reporting requirements but also from potential disruptions to established supply chains and operational practices. The efficacy of existing provincial programs suggests that a more targeted, supportive approach to reducing plastic waste might be more effective and less burdensome for stakeholders.

**Potential Duplication with Provincial Programs:** Our concerns are further compounded by the potential overlap with existing provincial Extended Producer Responsibility (EPR) programs. Many provinces have established effective mechanisms for managing plastic waste, tailored to their specific needs. A federal registry might not only duplicate these efforts but also lead to redundancies and increased compliance costs, undermining the efficiency of existing waste management strategies.

**Broad Scope and Extensive Reporting Requirements:** The proposed registry encompasses a wide range of plastic products used across various sectors, including agriculture. This expansive scope necessitates detailed reporting on a vast array of products, from packaging to essential agricultural aids like twine, irrigation equipment, and more. The comprehensive nature of these requirements could significantly increase the administrative burden on our members, particularly small and medium-sized enterprises.

**Implementation Complexity and Compliance Concerns:** The registry's phased implementation strategy introduces a complex compliance landscape. With reporting obligations expanding over several years to cover different categories of plastic products, our members face the daunting task of continuously adapting their reporting processes. This complexity may lead to confusion and potential non-compliance, inadvertently impacting growers who are already navigating a myriad of regulatory requirements.

**Supply Chain and Upstream Involvement:** Achieving compliance with the registry's detailed reporting requirements may necessitate greater upstream involvement, compelling growers to seek extensive manufacturing details from their suppliers. This requirement could complicate supply chain relationships and logistics, particularly for those who depend on a wide network of suppliers for their plastic products. The potential for designating a Producer Responsibility Organization (PRO) to report on behalf of producers acknowledges the registry's complexity but also highlights the need for coordinated efforts across the value chain.



## Rethinking the Federal Plastics Registry: Recommendations towards A Collaborative and Sustainable Approach for Canadian Agriculture

In response to the proposed Federal Plastics Registry under the Canadian Environmental Protection Act, FVGC calls for a strategic reassessment to align more closely with the realities and needs of the agricultural sector. Recognizing the significant concerns raised by growers—ranging from financial and administrative burdens to the potential for regulatory duplication and operational disruption— FVGC advocates for a nuanced approach that leverages the strengths of existing provincial programs, prioritizes incentives for sustainable practices, and fosters collaborative efforts across stakeholders. By exploring alternative models that have demonstrated success both locally and globally, such as innovative recycling initiatives, reusable packaging systems, and localized waste management solutions, FVGC envisions a path toward a more sustainable and less burdensome plastic waste management strategy. This approach not only aims to minimize the impact on growers but also contributes to the broader goal of environmental stewardship, emphasizing the importance of adaptability, support, and collaboration in addressing the complex challenges of plastic waste within Canada's agricultural landscape.

We advocate for strategies that support and enhance existing provincial initiatives, incentivize sustainable practices through financial mechanisms rather than mandatory reporting, and ensure a streamlined, efficient approach to plastic waste management that minimizes undue burdens on growers.

- **Strengthening Provincial Initiatives:** Support and enhance existing provincial programs through federal funding, expertise, and shared resources. This collaborative approach can amplify the success of these programs without introducing redundant regulatory layers.
- **Providing Incentives for Sustainable Practices:** Encourage the adoption of sustainable materials and practices through incentives rather than mandatory reporting. Financial incentives, tax breaks, and support for innovation can motivate businesses to reduce their plastic use more effectively than regulatory mandates.
- **Facilitating Stakeholder Collaboration:** Foster partnerships between government, industry, and environmental organizations to develop practical, innovative solutions to plastic waste that are tailored to the unique challenges of different sectors, including agriculture.

In evaluating how best to manage agricultural plastics (vs. consumer plastics) it is important to understand their value to the agri-food system and the role they play in biosecurity, plant and soil health and water sustainability, among others. The implications and associated costs in order to collect, recycle, re-use, compost, and/or dispose of agricultural plastics must also be considered, as well as the accessibility and applicability for rural vs. urban settings. Cleanfarms' report [Agricultural Plastic Characterization and Management on Canadian Farms](#), and on-going work on the [Zero Plastic Waste Strategy for Agriculture](#) has gathered valuable data to inform the collaboration and partnerships for success.



Fruit and Vegetable Growers of Canada (FVGC) wish to propose several alternative models that have shown success in managing plastic waste globally. We believe these alternatives could provide effective, less burdensome strategies for reducing plastic waste within our sector and beyond.

1. **Embracing Innovative Recycling and Circular Economy Initiatives:** Drawing inspiration from the International Union for Conservation of Nature (IUCN)<sup>1</sup>, we recommend supporting projects that convert plastic waste into useful products. These initiatives not only combat plastic pollution but also promote local entrepreneurship and sustainability. The development of business plans centered around locally sourced and recycled plastics can foster circular economic solutions tailored to Canada's unique contexts.
2. **Implementing Reusable Packaging Models:** In line with findings from the Ellen MacArthur Foundation (EMF) and McKinsey & Company<sup>2</sup>, reusable packaging emerges as a viable solution to minimize plastic waste. The adoption of business-to-consumer (B2C) reuse models, varying by refill and return mechanisms, can significantly reduce the need for single-use plastics. While challenges exist in scaling these models, addressing factors like acceptance, infrastructure, and cost could lead to substantial environmental and business benefits.
3. **Promoting Localized Waste Management Solutions:** The success of the Plastic Waste-Free Islands initiative by the IUCN underscores the impact of localized efforts on reducing plastic waste<sup>3</sup>. This project demonstrates how targeted waste management practices, including waste segregation at the source and improved recycling processes, can effectively reduce plastic leakage into the environment. We advocate for the promotion and support of similar local initiatives across Canada, which could adapt these successful models to the Canadian agricultural context.

Incorporating these alternative strategies into Canada's national approach to plastic waste management could alleviate the administrative and financial burdens associated with the proposed Federal Plastics Registry. By focusing on innovative recycling, reusable packaging, and localized waste management solutions, ECCC can foster a more sustainable and efficient framework for reducing plastic waste.

We appreciate the opportunity to share these suggestions and remain committed to collaborating with ECCC and other stakeholders to find practical, impactful solutions to plastic waste. We look forward to further discussions on how these alternatives can be integrated into Canada's environmental policies.

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<sup>1</sup> <https://www.iucn.org/news/202210/novel-concepts-and-alternatives-turn-plastic-waste-useful-products-resources-circular>

<sup>2</sup> <https://www.plasticsengineering.org/2024/01/packaging-reuse-models-ready-to-reduce-plastic-waste-002922/>

<sup>3</sup> <https://www.iucn.org/news/202210/novel-concepts-and-alternatives-turn-plastic-waste-useful-products-resources-circular>



We believe that through collaboration and dialogue, we can identify solutions that safeguard both our environment and the sustainability of Canada's agricultural sector. We look forward to further discussions on this matter and are ready to provide additional input or clarification as needed.

Sincerely,

Jan VanderHout  
President  
Fruit and Vegetable Growers of Canada