

April 8, 2025

Honourable Rebecca Schulz
Minister of Environment and Protected Areas
204 Legislature Building
10800 - 97 Avenue
Edmonton, AB T5K 2B6

Sent by email to: aep.minister@gov.ab.ca

Re: EPR Regulation Amendment

Dear Minister Schulz,

The Recycling Council of Alberta (RCA) is a cross-provincial, cross-sector organization with more than 330 members committed to advancing the circular economy in Alberta. I commend the Government of Alberta (GoA) on its implementation of the Extended Producer Responsibility (EPR) framework. Your commitment to an outcomes-based, enforceable EPR system ensures producers are held accountable for the products they produce and spurs them to do what they do best – innovate and find efficiencies. Designing products for waste reduction, reuse, and recycling is a critical step toward a circular economy and a critical step to ensure Alberta will have available and appropriate feedstock to realize its aim of becoming a Centre of Excellence in plastics recycling.

We are sharing our feedback on the regulation update from the GoA on March 26 to exempt flexible plastic packaging-like products (PLPs) that are typically used for the containment, protection, or handling of food, such as cling wrap, sandwich bags, and freezer bags.

Our concerns are three-fold:

1. The goals of EPR are to hold producers accountable to develop better products to innovate and find efficiencies. This regulatory change lets producers off the hook and allows for the status quo of materials to continue to, in many cases, to be sent to landfill. Furthermore, our municipal members are left holding the bag to communicate about, manage, recycle or dispose of materials that were, and should be, part of a provincial EPR program.
2. The GoA and partners have been working diligently to stand up EPR. This last-minute update undermines the hard work of many who are implementing the specific details of the regulation to roll out the programs in their communities.
3. The RCA is disappointed with the lack of communication and engagement on these updates, as they were being considered as well as after the decision was made. The RCA has an expectation that key program implementation partners keep each other, and stakeholders informed. We're all in this together – let's work together.



We are all looking to build the best EPR system for Alberta. As the GoA considers further regulatory amendments and updates, I would be more than pleased to meet with you or share more information about the RCA's position and concerns.

The RCA remains fully invested in the success of EPR in our province and collaborating with partners and members to advance the circular economy. The successful launch of this first round of EPR implementation will lay the groundwork for designating additional materials for diversion under Alberta's EPR framework in the future.

Sincerely,



Jennifer Koole, Executive Director

cc:

Ed Gugenheimer, Alberta Recycling Management Authority - egugenheimer@albertarecycling.ca

Allen Langdon, Circular Materials - alangdon@circularmaterials.ca

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