

September 12, 2025

Sent by email to: [AGI.AgPlasticsEngagement@gov.ab.ca](mailto:AGI.AgPlasticsEngagement@gov.ab.ca)

## **Re: Managing Agricultural Plastics Waste Engagement**

To the Ministries of: Alberta Environment and Protected Areas + Alberta Agriculture and Irrigation,

Thank you for the opportunity to contribute to the Government of Alberta's engagement process on managing agricultural plastics waste through a regulatory approach.

The Recycling Council of Alberta (RCA) is a non-profit organization with over 350 members. We champion policies, systems, technologies, and programs that advance the circular economy in Alberta. For many years, we have served on the Executive Committee of the Agricultural Plastics Recycling Group (APRG) and have been proud supporters of the *Alberta Ag-Plastic: Recycle It!* pilot program.

With funding and support from your ministries, the pilot has made significant strides in diverting grain bags and baler twine from landfills—and away from burning or burying. While the results are encouraging, the pilot remains a temporary solution. We strongly support the Government of Alberta's efforts to move toward a regulated, long-term approach that offers consistency, accountability, and real environmental benefits.

### **1. Support for an Extended Producer Responsibility (EPR) Framework**

The RCA recommends Extended Producer Responsibility (EPR) as the most effective and future-oriented regulatory model for agricultural plastics. Compared to stewardship models, EPR offers:

- **Stronger accountability:** Responsibility is placed on producers throughout the product lifecycle.
- **More innovation:** Producers are incentivized to redesign and reduce materials—moving beyond recycling to more sustainable product design (e.g., through eco-modulation).
- **Better alignment:** Harmonizes Alberta's system with neighbouring provinces, enabling economies of scale and a unified market.
- **Greater transparency:** Makes costs visible and ensures Albertans understand how these materials are managed.
- **Market flexibility:** EPR allows fees to adapt to changing market conditions more efficiently than stewardship models.
- **Continuous improvement:** Regulation can include progressive targets, supporting steady improvements in collection, recycling, and even reduced dependency on plastics.

We believe EPR is the best model for achieving long-term environmental, economic, and social outcomes in Alberta.

## 2. Designated Materials and Phased Implementation

We support the initial list of designated materials—including grain bags, seed/pesticide/inoculant bags, containers under 23L, bale wrap, net wrap, baler twine, and silage covers/bags—as a strong and appropriate starting point.

We also encourage the government to consider expanding the list in future phases to include materials such as lick/mineral tubs, greenhouse film, supersacks, feed bags, and livestock medication containers.

Together with our APRG partners, we recommend aligning the implementation timeline for bale wrap and silage plastics with the expansion of the current pilot. Specifically, we support:

- Extending the pilot from December 2025 to December 2029
- Including more materials in the pilot to gather data and maintain producer confidence such as bale wrap and silage plastic
- Transitioning smoothly to a fully regulated EPR program by 2030.

This phased approach will ensure data-driven decisions, continuous service for producers, and a seamless transition to regulation.

## 3. Access and Collection Standards

Reliable, accessible collection is key to program success. We support the proposed guideline of having **80% of farms and ranches within 80 km** of a collection site, supplemented by:

- Annual collection events
- On-farm pickup for high-volume users

We recognize that many municipalities have supported the pilot by hosting collection sites. Under a regulated EPR system, producers (or Producer Responsibility Organizations) must take responsibility for these logistics. If municipalities choose to continue participating, their role must be:

- **Voluntary**, not mandatory
- **Flexible**, to allow local decision-making
- **Fairly compensated** by producers or PROs to avoid burdening local taxpayers

Other collection models, including **return-to-retail**, should also be explored.

## 4. Recovery Targets: Ambitious but Achievable

We support setting realistic, evidence-based targets informed by pilot data. To that end, using a 3-year rolling average for recovery rates is a proven method to account for and adjust for the non-annual purchasing and disposal habits of agricultural plastic products by farmers.

Where data is limited, APRG has proposed—and we endorse—initial targets such as:

- **Seed bags:** 35%
- **Bale wrap:** 40%
- **Silage plastics:** 40%

To ensure progress, we support increasing these targets by **5% every three years**, in line with the principle of continual improvement embedded in EPR systems.

## 5. Clear Producer Definitions

To avoid unintended consequences, the definition of “producer” must be clearly outlined. Farmers importing plastics for personal use should **not** be obligated. Responsibility should remain with:

- Brand owners
- Importers
- Retailers

This aligns with definitions used in other Canadian jurisdictions and ensures consistency.

## 6. Waste-to-Energy in the R-Ladder Context

The RCA promotes the **R-Ladder** hierarchy, which, for agricultural plastics, prioritizes:

1. **Reduction**
2. **Reuse**
3. **Redesign**
4. **Recycling**
5. **Recovery (e.g., waste-to-energy)**

A regulated system should aim to manage agricultural plastics as high on this ladder as possible. While **waste-to-energy** may be a preferable alternative to open burning or burying, it should be considered **only when higher-order solutions are not yet viable**.

## 7. Transparency and Accountability

A regulated approach provides an opportunity to embed clear reporting and accountability measures. We recommend that EPR regulations require:

- Public reporting of material management practices, costs, and fee structures
- Transparent methodologies for calculating program fees
- Regular audits and performance reviews.

This builds public trust and reinforces a circular economy approach.



## Conclusion

The Recycling Council of Alberta strongly supports a regulated EPR framework for managing agricultural plastics. We encourage the Government of Alberta to adopt a model that:

- Prioritizes **design, reduction, and recycling**
- Aligns with the **R-Ladder hierarchy**
- Follows a **phased, data-driven implementation**
- Ensures **transparency, accountability, and fair cost distribution.**

We commend your leadership on this important issue and are eager to continue collaborating as Alberta moves toward a sustainable, long-term solution for agricultural plastics.

Sincerely,



Jennifer Koole, Executive Director

