

## **VIRTUAL STAKEHOLDER WORKSHOP:**

# **Informing a Strategic Approach to Data Collection & Reporting for Canada's Plastics Packaging Value Chain**

**April 11, 2024**





# Competition Disclaimer

*Any discussion or exchange that may appear to, or that in fact may breach competition rules will be brought to an end immediately. These rules refer generally to the exchange of competitively sensitive information.*

# Workshop Context

- The **Canada Plastics Pact** and **Circular Economy Leadership Canada** released a discussion paper prepared by **Intafesu Consulting**, exploring the challenges facing Canada's Plastics Data System
- CPP Roadmap 2.0 Priority 3: **Use Data to Improve the Whole System**
- To advance a strategic and harmonized approach, we need to convene key stakeholders to:
  - **Validate perspectives** on the key challenges and barriers outlined in the paper
  - **Identify important solutions** and pathways forward to strengthen data and reporting efforts across Canada's packaging value chain

# POLICY DRIVERS

## Global Commitments

- UN Global Plastics Treaty (UNEA 5.2) (proposed for 2024)
- Ocean Plastics Charter (signed 2018)

## National Commitments

- Canada-wide Strategy on Zero Plastic Waste / Action Plan (approved by CCME 2018)
- Federal Government's single-use plastic bans (first iteration effective 2022)
- Minimum recycled content regulations for plastics (regulations by 2024)
- Federal labelling rules for recyclability and compostability (proposed for 2026 onward)
- Federal Plastics Registry (Phase 1 proposed for June 2025, with increasing reporting demands by 2028)
- Reuse frameworks for secondary packaging

## Provincial and Territorial Commitments

- Extended producer responsibility (EPR) requirements

## Municipal Commitments

- Multiple recycling, reuse, and compostability rules and bylaws
- Multiple home waste management initiatives (e.g., garbage tag systems), landfill bans, and related fees

# Workshop Objectives

**The objectives of this 90-minute virtual stakeholder workshop are to:**

1. Present the highlights of the Data & Reporting Discussion Paper
2. Discuss the key issues and findings from various perspectives across the plastics packaging value chain
3. Discuss the important considerations for advancing a national data strategy

# Meeting Agenda

Time (ET)	
2:00 pm	Welcome & Opening Remarks
2:05 pm	<b>PART 1:</b> Presentation by Dan Duguay: <i>Key Challenges for Data Collection and Reporting from Discussion Paper</i>
2:20 pm	Q&A & Feedback
2:35 pm	<b>PART 2:</b> Presentation by Peter Hargreaves: <i>Highlights of Data Gaps from Strategy Research</i>
2:50 pm	<b>Breakout Group Discussions:</b> <i>Reflecting on the Gaps and Solutions from a Strategic Data Approach</i>
3:25 pm	Next Steps & Closing Remarks



## **IMPROVING DATA COLLECTION, REPORTING & TRANSPARENCY WITHIN THE PLASTICS PACKAGING VALUE CHAIN**

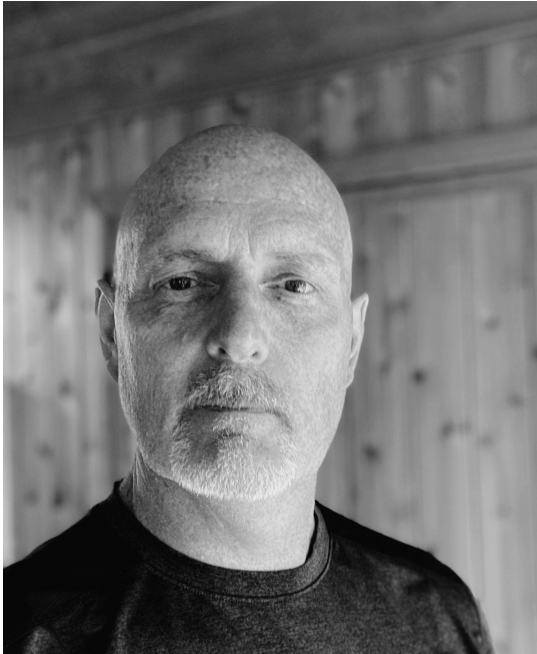
FRAMING DATA COLLECTION AND REPORTING CHALLENGES AND  
OPPORTUNITIES TO DRIVE PLASTICS PACKAGING SYSTEM CHANGE

PREPARED FOR:



DISCUSSION PAPER | OCTOBER 2023





**PART 1: Key Challenges for Data  
Collection and Reporting from Discussion  
Paper**

**Dan Duguay**

**Intafesu Consulting &  
Canadian Produce Marketing Association**



# Data and Reporting Workshop

Findings of CPP / CELC Discussion Paper

Daniel Duguay

Sustainability Specialist | CPMA

# Improving Data Collection, Reporting & Transparency within the Plastics Packaging Value Chain | Oct 2023



- ◆ Research & industry interviews Spring/Summer 2023
- ◆ Interviews included:
  - Leading Canadian retailers
  - Canadian industry associations
  - Leading Canadian food brands
  - National recycling and circular economy stakeholders
  - Data industry experts
- ◆ Goal: Identify leading challenges and barriers to plastics data collection & reporting

# Data Structure, Harmonization & Quality

- ◆ **Regional variances in reporting requirements**
- ◆ **Variances in terms of plastics items in scope**
- ◆ **Varying levels of data quality**
- ◆ **Lack of common data structures to enable scalability & traceability**

*"...there is no harmonized approach to defining what is in scope in terms of reporting across various regions in Canada..."*

- Canadian industry association

*...the lack of a common framework across these various jurisdictions results in data collection and reporting requirements that create a significant administrative and financial burden on industry...*

- leading Canadian retailer

# Data Ownership & Incentives

- ◆ **Concerns with data ownership and sensitivity**
- ◆ **Lack of sufficient internal or external incentives**

*"...EPR data collection is not aligned with key policy and priority drivers such as the Golden Design Rule-related framework...what is being advocated is not being measured..."*

- Leading Canadian food brand

*"...these barriers adversely impact not only the sharing of data between suppliers and customers but can hinder the sharing of data beyond direct transactional relationships..."*

- Leading Canadian retailer

# Regulatory Dissonance & Governance

- ◆ **Concerns with regulatory dissonance**

*“...the risks and impacts to industry are compounded by the likelihood that regulatory agencies within various jurisdictions will develop their own requirements, producing an increasing lack of regulatory harmonization...”*

- Canadian industry association

- ◆ **Distributed governance**

*“...given the lack of sufficient national coordination at the moment, data collection is piecemeal and not necessarily aligned with a national goal of reducing the environmental impacts of plastics...”*

- Canadian industry association

# Data Collection: A Strategic Activity

- ◆ **Data collection is not linked to strategic business decision-making – and its impact on transitioning the plastics system in Canada**

*“...the lack of quality data hinders or fully prevents businesses, policy makers, regulators and consumers from distinguishing authentic sustainability leadership and action from greenwashing and hype...”*

- Recycling industry organization

# Data Collection – The Underlying Root Causes

- ◆ **Drivers for plastics data collection vary and are highly localized.**
- ◆ **A systems-based approach to plastics data collection and reporting is largely absent.**
- ◆ **Plastics data collection is not structured and governed to align with and serve strategic outcomes and a systems-based approach.**

*“...plastics data is collected to achieve three things: strategy, confidence and compliance...”*

- Leading data industry expert

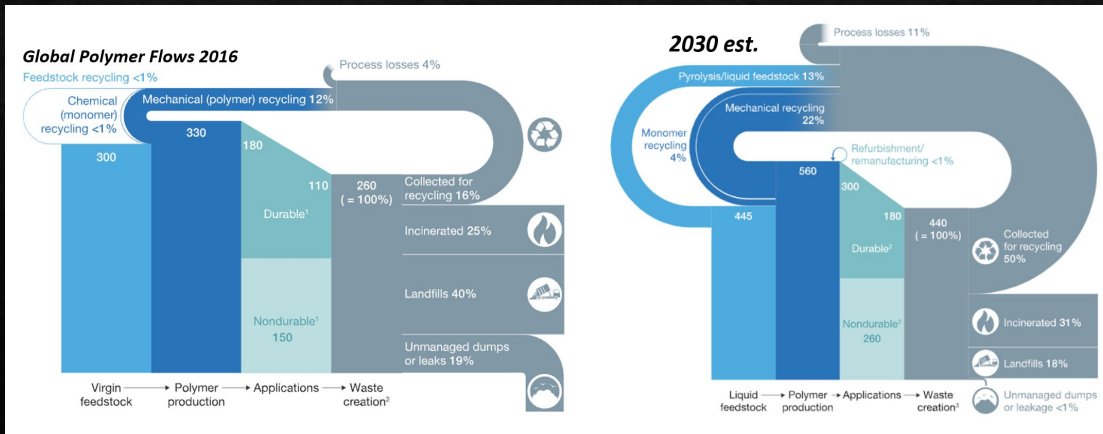
*“...although plastics system change is frequently mentioned as a desired policy or business outcome, a systems-based approach has yet to frame and define the activity of plastics data collection...”*

- National circular economy organization



# Effective Data Collection – *critical to understanding the state of the plastics system*

- ◆ Plastics system change is only possible thru the collection, analysis and reporting of functional and regional data across the supply chain.



“... the desired changes to the plastics system includes:

- reducing the use of virgin material,
- use more recycled content, and
- sending less plastic to landfills...”

- National circular economy organization

“...a lack of harmonization in plastics data attributes which will further hinder the collection of the necessary plastics data to permit analysis of the plastics system, and by extension inform plastics decision making...”

- Major Canadian retailer

# Q&A



# Your Feedback

In **3 words or less**, describe the *biggest challenges* from your perspective with respect to data and reporting in the plastics packaging value chain.

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# Your Feedback

1. Do the overarching challenges shared by Dan Duguay (from the Discussion Paper) properly frame the key issues?
2. If you answered 'NO' to question 1, what additional context is missing from your perspective?
3. From your perspective within the plastics packaging value chain, what is the most critical issue / challenge we need to solve as it relates to data collection and/or reporting?

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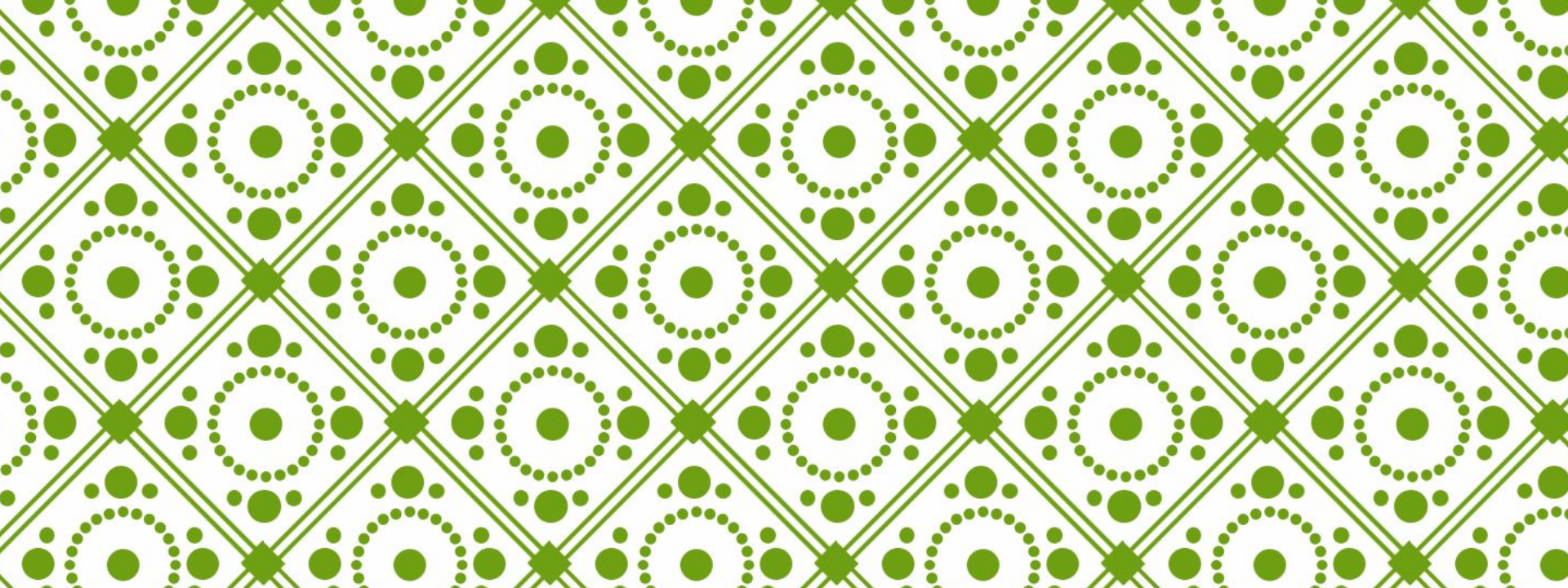




## **PART 2:** Highlights of Data Gaps from Strategy Research

**Peter Hargreave**

**President, Policy Integrity**



# DATA STRATEGY RESEARCH

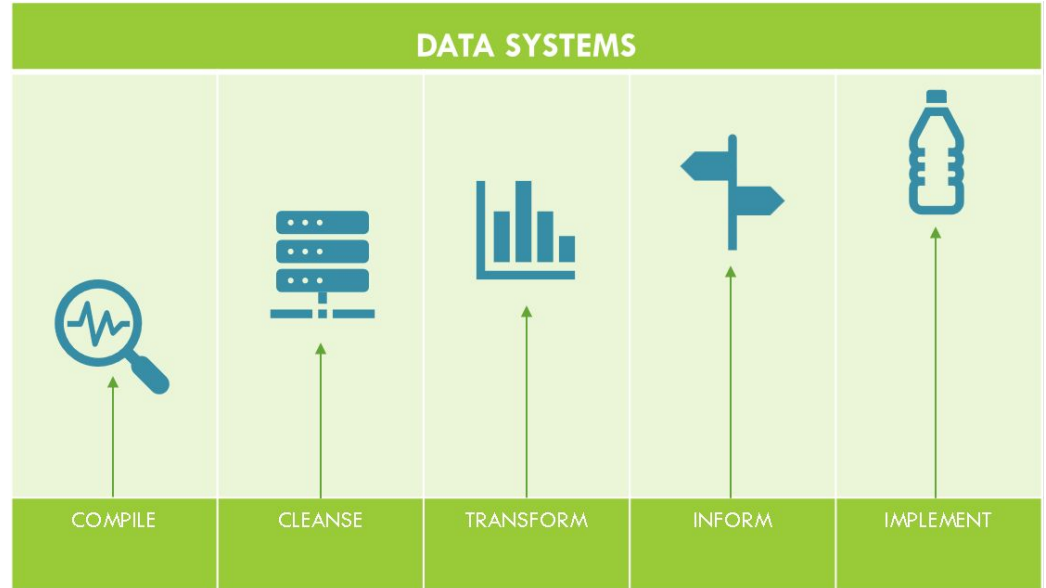
CPP-CELC Data Workshop  
April 11, 2024





# OVERVIEW

1. Project and how you help
2. Issue: Current state lacks strategy
3. Future vision
4. Gaps between here and there

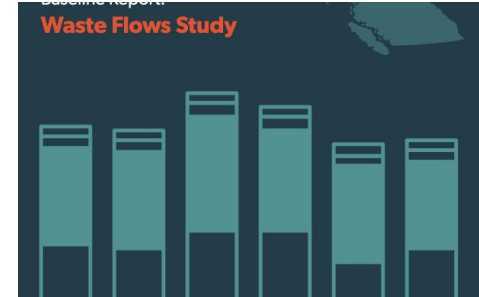


# WORKING TOWARDS THE GOAL

Undertaken a series of projects to evaluate plastic packaging data and reporting requirements with an aim to identify gaps and recommend regulations, standards, and support tools to fill those gaps.

Identified 5 cross-cutting, core gaps:

1. Lack of a data chain of custody
2. Lack of ability for data validation and verification
3. Inability to normalize and report on verified plastic packaging data
4. Limited feedback loops
5. Limited reporting



# BREAKOUT QUESTIONS

1. **Are there any significant data gaps** that have not been identified and/or additional context that may be missing to explain some of the root problems associated with data management?
2. **Which solutions** (e.g., technologies, standards, and/or processes) should be explored to fill the identified gaps? Consider solutions that may be relevant to **one or more** specific data gaps (specific or general / overarching).

**Permitting requirements**

**DRS beverage containers \*12** –plastic units sold & weight HPDE, PET, MRP, pouches, bladders collected

BUT each policy contains different types containers – broader (AB) to narrower (MB malt beverage and beer only)

**EPR PPP \*12 by 2030** – sometimes resin sold, often type of packaging sold (e.g., film, EPS, PET thermoform), reporting on rigid / flexible recovered

BUT each policy contains different types of plastics packaging from broader policies (i.e., QC with all ICI by 2030) to narrower (i.e., SK residential only, no non-PPP SUPs like cutlery)

And in some cases different **Federal plastics registry** (in development) – 41 categories of plastic PPP supplied



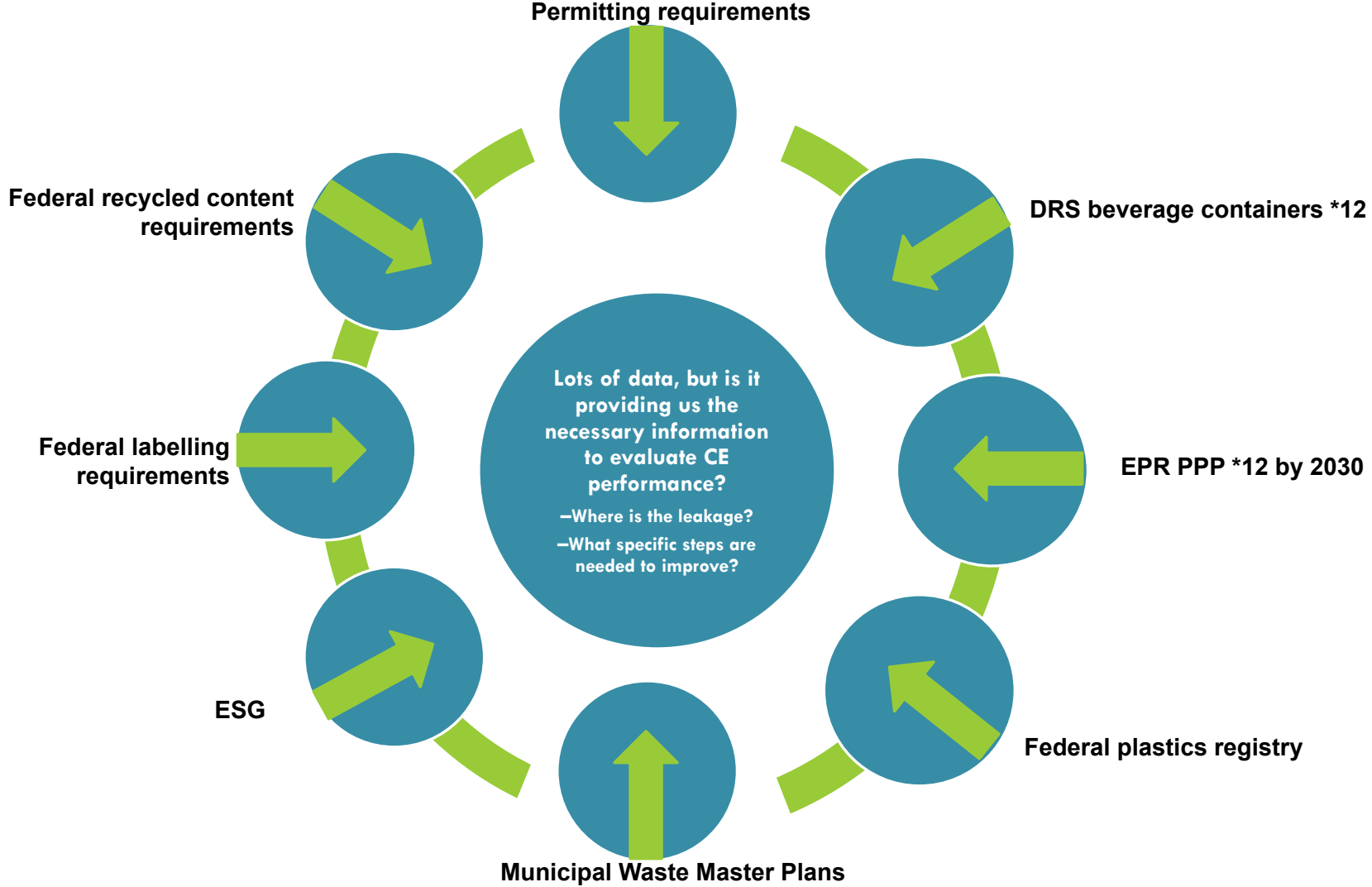
**Overarching goal:**  
Circular economy for plastics

**Municipal Waste Master Plans**

**Federal recycled content requirements** (in development) would require proof of PCR/CRR

**Federal labelling requirements** (in development) would require proof of collection and reprocessing

**ESG**– now mandatory reporting in the EU for publicly traded companies



**Stakeholders are collecting data to meet different needs:**

Generators – regulatory compliance and ESG

Haulers, MRFs, Reprocessors – economic, contractual reporting

Provincial & Local government – public reporting on diversion, climate change

Federal government – public reporting on plastics and climate change, international agreements

Producers – regulatory compliance, ESG

PROs – fee setting, regulatory compliance, ESG

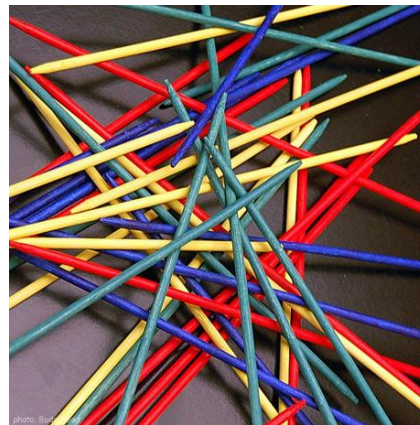
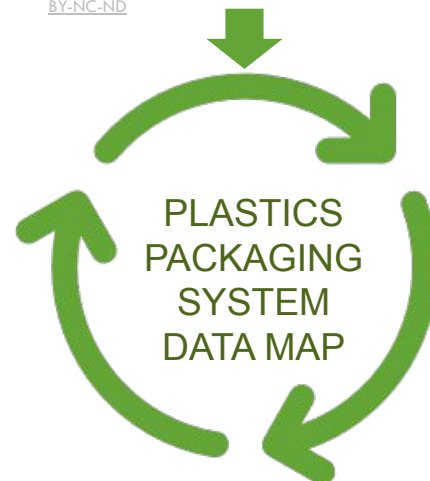


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Upstream – product manufacturing and retail



Consumer / Waste Generator

Downstream – hauler, processor (MRF), reprocessor (recycler)

# VISION: SYSTEMS LEVEL DATA TO SEE & UNDERSTAND THE CORE PROBLEMS

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What data would we all need to know to understand the current state / future state gap?

What parts of the plastic chain need validation and verification?

How should imports of non-Canadian feedstock PCR 'count' towards problem solving?

What data would lead to more strategic decisions about solving problem?



What tools already exist that that could be a best practice if widely adopted?

How should exports of plastic waste fit into the calculations?

What tools are needed for validation and verification? Certifications, standards, systems?

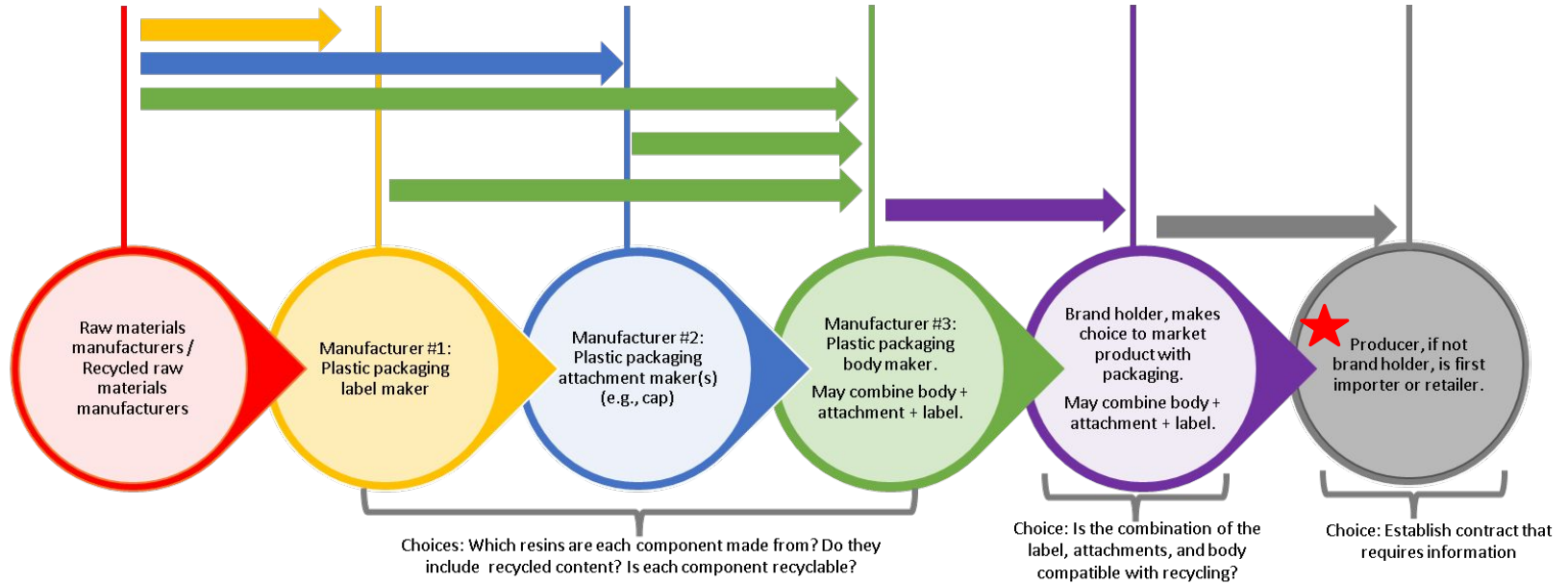
# GAP 1: Data Chain of Custody

**Issue:** Who has access to the data.

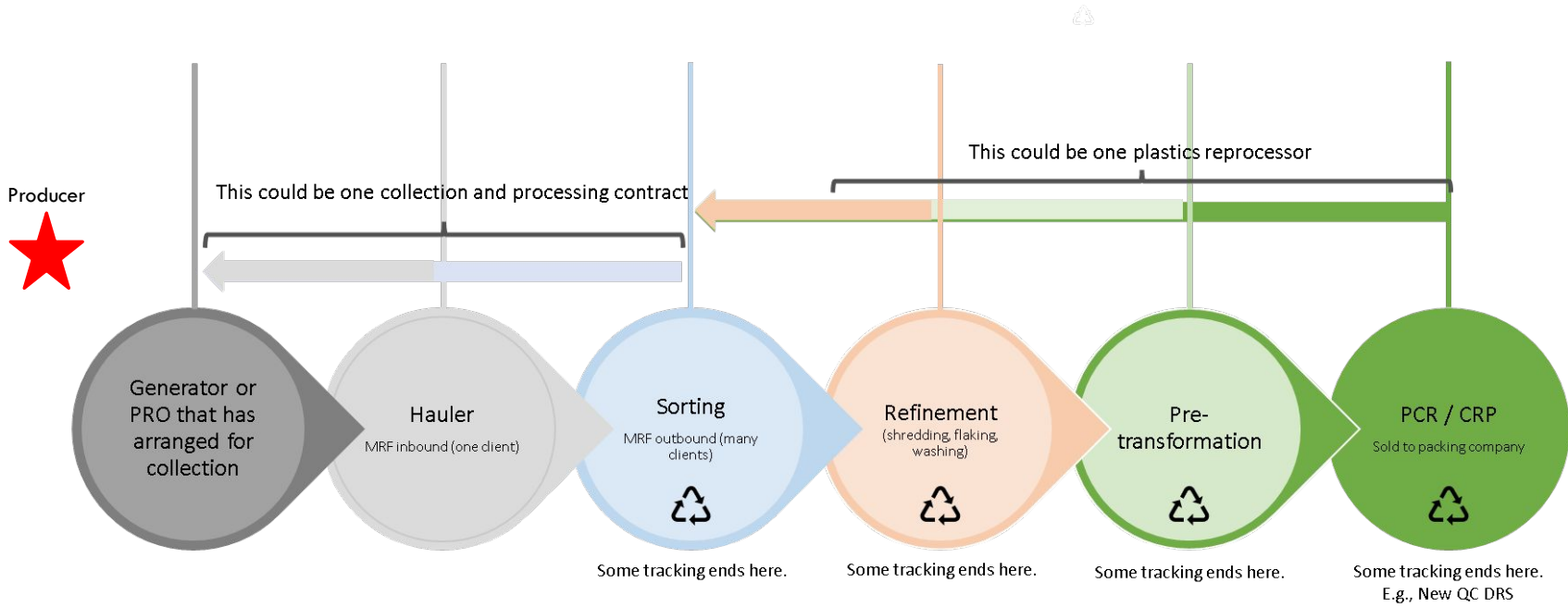
**Details:** Information flow moves under contractual agreements but need full chain of custody to understand sources and final disposition.

**Example of potential solutions:** Certification processes (e.g., Certificate of Compliance for Food Grade Packaging).





# UPSTREAM FLOW



# DOWNSTREAM FLOW

## GAP 2:

# Data Validation & Verification Requirements & Processes

**Issue:** Who has access to the data and can the data be 'trusted'.

**Details:** Lack ability to verify data held by others along the value chain who are not directly contracted to them.

**Example of potential solutions:** Standards to ensure common approaches to validate and verify data along the value chain (i.e., supplied, recycled - mechanical/chemical, recyclability, recycled content).

# GAP 3:

## Mechanisms to Normalize & Report on Verified Plastic Packaging Data

**Issue:** In what format is data being collected and how is it being distributed?

**Details:** Lack of harmonization in data reporting (e.g., exemptions, deductions, conversions, estimates, Canada-wide flow) and access to data to inform decisions.

**Example of potential solutions:** National standards to harmonize which data is collected and how it is made available.

# DRS VS PPP CATEGORIES REPORTED

## DRS

- Mixed Plastic Resins
- MRP
- FPP
- PET (#1)
- HDPE(#2)
- Polycups
- Key Kegs
- Pouches
- Bladders
- Compostable/ Degradable

## PPP

- Mixed Plastic Resins
- MRP
- FPP
- (#1) PET All by Size
- (#1) PET Bottles
- (#1) PET Containers
- (#1) PET Thermoform
- (#2) HDPE All by Size
- (#2) HDPE Bottles
- (#2) HDPE Containers
- (#2) PVC All
- HDPE & LDPE FILM
- HDPE & LDPE Shopping Bags

- (#5) PP All
- (#6) PS All
- Food Packaging EPS
- EPS Goods Packaging
- (#7) Other
- All Laminates
- Beverage Containers (Ontario only)
- All Compostable/  
Biodegradable/  
PLA/PHA/PHB
- All Compostable/ Biodegradable/PLA/PHA/PHB
- Bottles & Containers Compostable/ Biodegradable/PLA/PHA/PHB
- FILM Compostable/ Biodegradable/ PLA/PHA/PHB
- Shopping Bags Compostable/ Biodegradable/ PLA/PHA/PHB

# GAP 4:

## Limited Feedback Loops Related Packaging Composition Decisions

**Issue:** Lack of effective data feedback.

**Details:** Limited feedback loop to upstream actors re downstream outcomes to improve recyclability (e.g., primary container, closure, attachments, label).

**Examples of potential solutions:**

- Pre-market recyclability assessments,
- Eco-modulation considerations related to recycling disruptors,
- Standardized recycler residual audits and reporting.

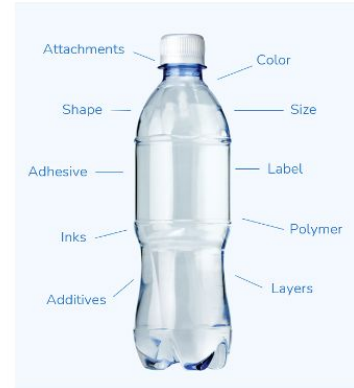


## APR Recyclability Categories

The APR Design® Guide views a package as a compilation of design features.

Design features that are commonly used with plastic packaging applications include:

- Base resin
- Color
- Size and dimensions
- Closures and dispensers
- Barrier Layers, coatings, and additives
- Labels, adhesives, and ink
- Attachments



# WHAT MATTERS TO IMPROVE RECYCLABILITY

## GAP 5:

Need for  
Specific Data  
to be Available  
in Specific  
Forms to Make  
Informed  
Decisions

**Issue:** Data quality and format.

**Details:** Even when downstream data is provided to upstream actors, it is often not in a form that provides usable information.

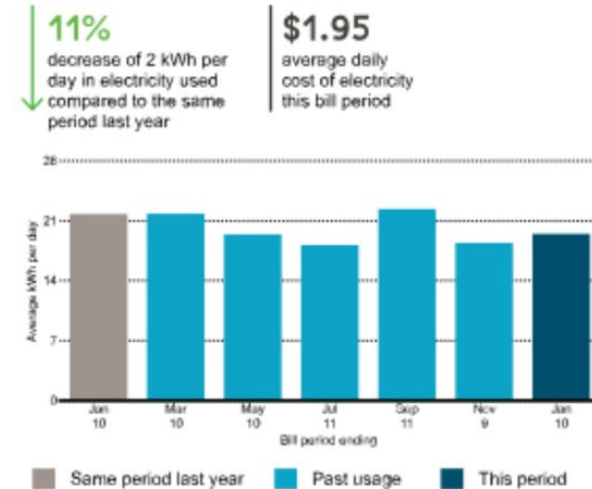
**Example of Potential Solutions:** Waste generation reporting and billing could be standardized.



# NO STANDARDIZED REPORTING REQUIREMENTS

- How much is being generated and of what?
- Where did the material go (e.g., transfer station, disposal, reprocessor)?
- Are there issues with contamination?

## Your electricity usage over time



# THANK YOU

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# Breakout Groups: Rules of Engagement

## Get Ready to Engage!

- Over the next 35 minutes, we will breakout into discussion groups to answer 2 questions
- You can now unmute your mic and use the chat box to share
- Your breakout room facilitator will guide the discussion and take notes
- Be clear and succinct in your responses
- Please be respectful of the ideas and opinions of others
- Session will follow 'Chatham House' rules

# Breakout Group: Discussion Questions

1. **Are there any significant data gaps** that have not been identified and/or additional context that may be missing to explain some of the root problems associated with data management?
2. **What solutions** (e.g., technologies, standards, and/or processes) should be explored to fill the identified gaps? Consider solutions that may be relevant to **one or more** specific data gaps (specific or general / overarching).

# Next Steps

1. Review the feedback we've heard in today's session as part of Policy Integrity's research
2. Policy Integrity's final report is planned for release in May 2024 by the Canada Plastics Pact
3. Potential for a follow up workshop(s) or engagements in 2024

# THANK YOU!

- Quick post-event survey once you close the Zoom window — We appreciate receiving your feedback!
- If you like more information on CPP and/or CELC and becoming a Partner, please reach out to:

[info@plasticspact.ca](mailto:info@plasticspact.ca)

[info@circulareconomyleaders.ca](mailto:info@circulareconomyleaders.ca)

