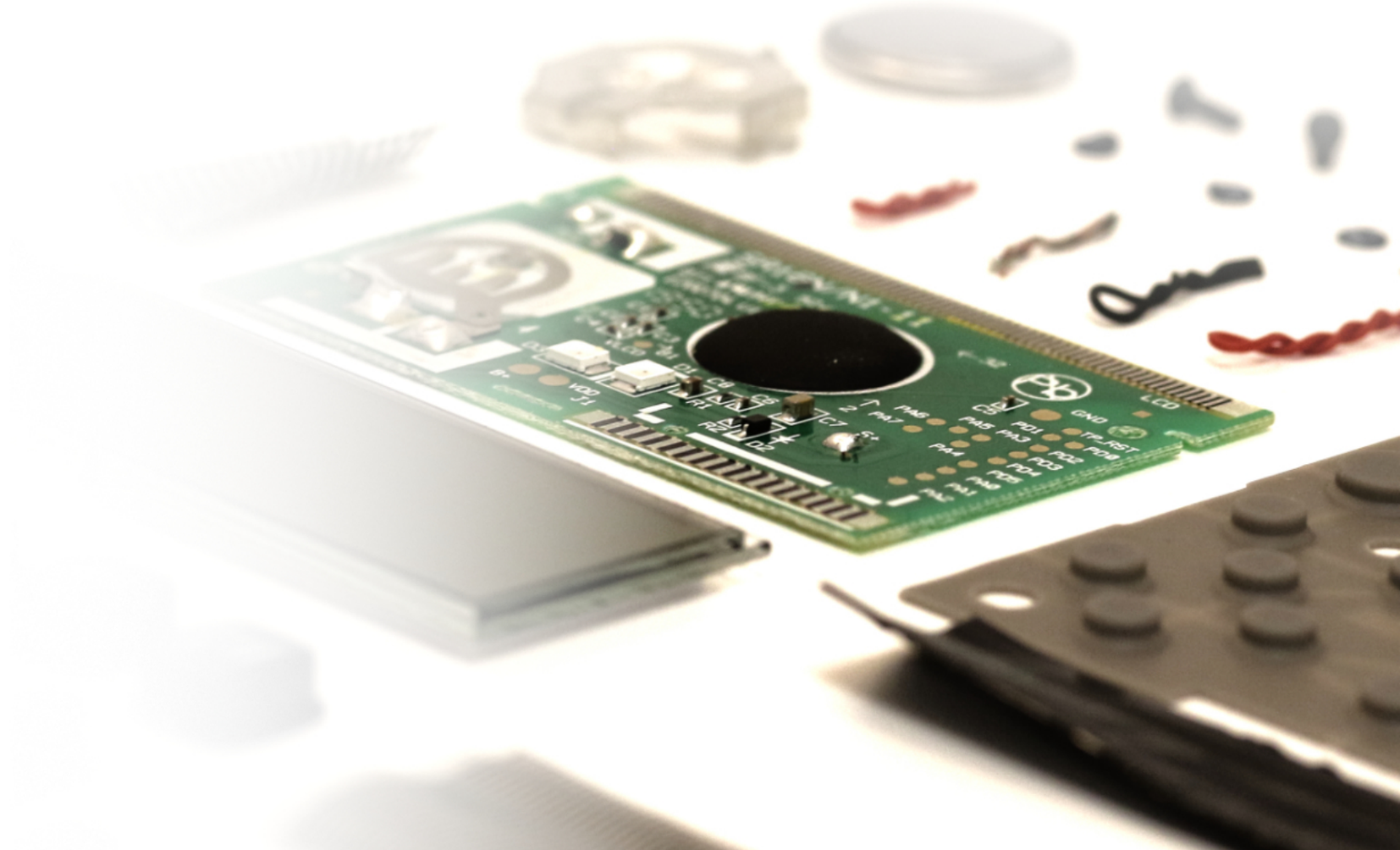
Claigan
Less Journey. More Results.

Claigan Webinar
Canadian Plastics Registry Guidance

Presented by:
Bruce Calder
VP Consulting

February 26, 2025



Why are we doing a webinar so soon?

- **Your last webinar was only two week ago?!?**

New guidance!

And submission is due..

In 7 MONTHS!

To RECAP

New

Average project

d submission is due..

In 7 MONTHS!

Guide for Reporting to the Federal Plastics Registry

Phase 1

Clock is ticking…

Claigan Plastics Registry

- **Claigan is the only company that has it all together**

Date Evaluated	1/22/2025			
Product Weight (including packaging in g)	1287.1			
Plastic Compositon	38.66%			
Method used	Specific component identification method			
	Product g	Textiles g	%	Packaging g
2811211 Polyethylene terephthalate (PET) resins	14.07	0	1.09%	0
2811219 Other thermoplastic polyester resins	28.13	0	2.19%	0
2811221 Low-density polyethylene (LDPE) resins	0	0	2.93%	37.7
2811222 Linear low-density polyethylene (LLDPE) resins	0	0	0.00%	0
2811223 High-density polyethylene (HDPE) resins	0	0	0.00%	0
2811229 Other polyethylene resins	5.31	0	0.41%	0
2811231 Polystyrene (PS) resins	0.01	0	0.00%	0
2811291 Acrylonitrile-butadiene-styrene (ABS) resins	0	0	0.00%	0
2811292 Polyvinyl chloride (PVC) resins	53.77	0	4.18%	0
2811293 Polypropylene (PP) resins	250.55	0	19.54%	0.9
2811294 Thermoplastic polyurethane (TPU) resins	0	0	0.00%	0
2811295 Polyamide (PA, nylon) resins	2.14	0	0.17%	0
2811299 All other thermoplastic resins, n.e.c.	105	0	8.16%	0
2811411 Bio-based thermoplastic resins	0	0	0.00%	0
2811412 Petroleum-based biodegradable thermoplastic resins	0	0	0.00%	0
2811311 Phenolic (PF) resins	0	0	0.00%	0
2811312 Urea formaldehyde (UF) resins	0	0	0.00%	0
2811319 All other formaldehyde-based resins	0	0	0.00%	0
2811391 Thermosetting unsaturated polyester (UPR) resins	0	0	0.00%	0
2811392 Thermosetting polyurethane (PU) resins	0	0	0.00%	0
2811399 Other thermosetting resins, n.e.c.	0	0	0.00%	0
2811413 Bio-based thermoset resins	0	0	0.00%	0
Total Weight (Plastics)	**459**	**0**	**38.66%**	**38.6**
Gross Weight (Plastics) - Product, Textiles, and Packaging	**497.6**			

Side Note
Claigan PFAS

- **I am quoted on PFAS on [CBC]**

ANALYSIS

Why Canada can't strip Elon Musk of Canadian citizenship

MP says petition to take away citizenship is about sending a message

16 Minutes Ago

Israelis gather for Bibas family funeral procession as ceasefire dispute is resolved

Hamas agreed to release the last hostage bodies included in Phase 1 of the Gaza ceasefire deal, in a breakthrough announced as Israelis mourned a family seen as a symbol of the trauma suffered by Israel in the attack on Oct. 7, 2023.

World | 1 Hour Ago

PFAS are in many clothes. Here's what to do with your Gore-Tex jacket

There's less toxic PFAS, or 'forever chemicals,' in raincoats and other products sold in Canada, thanks to new rules elsewhere. But where is PFAS still found? What are the rules here anyway? Should you throw out your old Gore-Tex jacket? And what should you do to avoid products with PFAS?

Science | 6 Hours Ago

Menu

CBC

NEWS | Top Stories | Local | Climate | World | Canada | Politics | Indigenous

Science

New bans target PFAS in clothing. Here's how to avoid exposure

PFAS is being phased out of raincoats and gloves, but still in takeout bowls and microwave popcorn

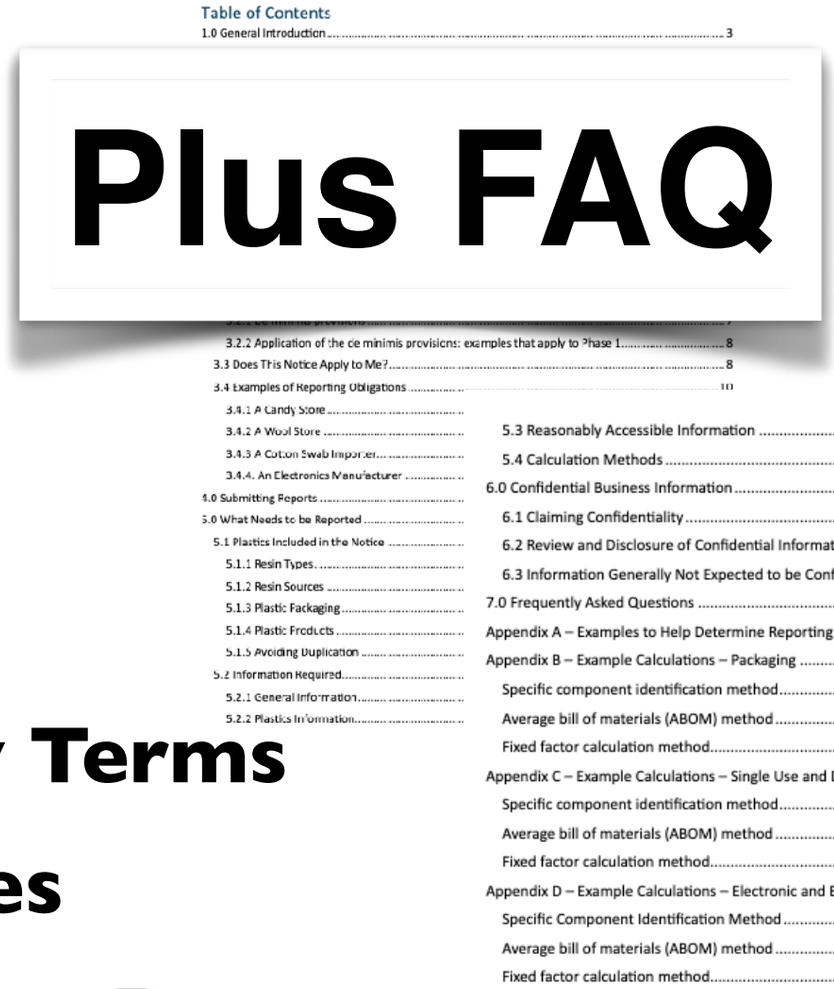
Emily Chung · CBC News · Posted: Feb 26, 2025 4:00 AM EST | Last Updated: 6 minutes ago

Many rain jackets used to be made with PFAS-based fabrics and waterproof coatings. Those are now being phased out due to new bans in places such as California. (Brian MacKay/CBC)

Guidance Summary

- For Canadian Plastics Registry - Phase 1
  - Phase 1 - Due September 29 2025

- Details
  - Released end of 2024
  - 53 pages
  - Contains
    - **Explanation of Key Terms**
    - **Reporting Timelines**
    - **Persons Obligated to Report**
    - **What Needs to be Reported**
    - **<u>Example Calculations</u>**



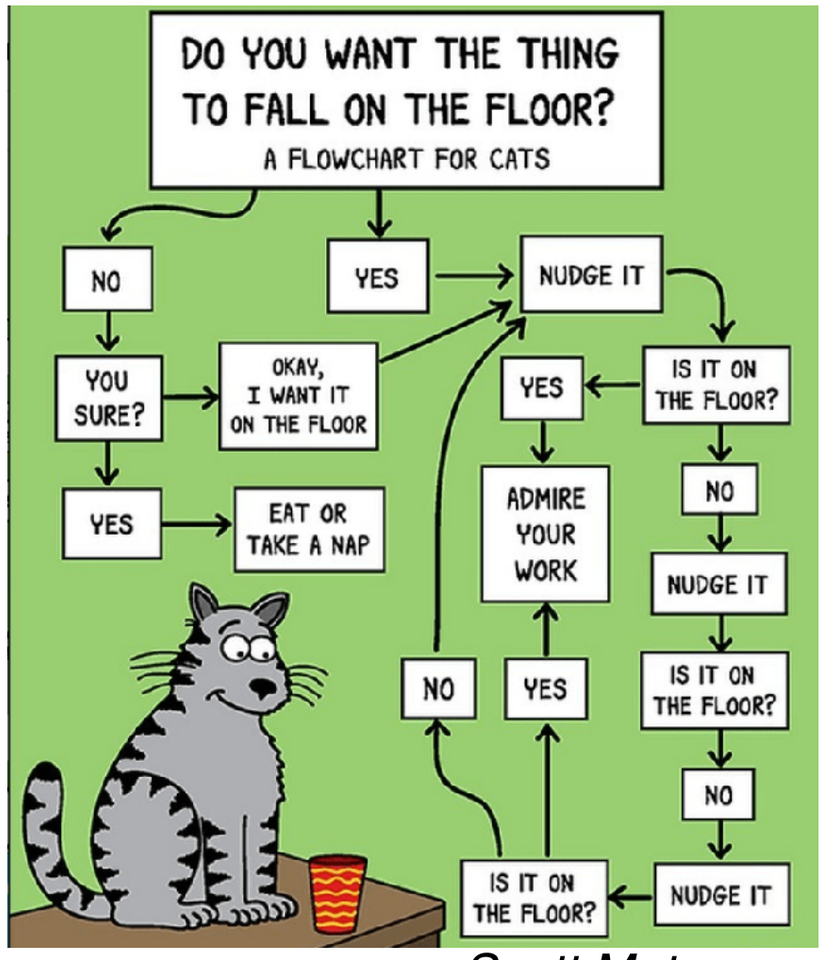
Who is responsible

- Responsible party

- **Brand Owner**
  - If located in Canada

- Otherwise

- **Importer**
  - If brand owner not located in Canada



Scott Metzger

De Minimis Exemption

- What is the threshold to have to report?

- **IF** combined total of
  - Plastic products and plastics packaging
  - Over 1,000 kg per year
    - Manufactured in Canada, or
    - Imported into Canada, or
    - Sold in Canada

- **Note -** Section 3 (pg 9) of the guidance has many examples

Canadian Plastics Registry
Reporting 2025 vs 2026

Phase 1

Certain Products

Residential Waste

2025

"Consumer"

Disposed of by Consumer

Phase 2

Institutional Waste

2026

"Institutional"

Disposed of by Business

Scope of the Canadian Plastics Registry

Phase 1

2025 Reporting
(For 2024 year)

Consumer Electronics
Including medical devices

Consumer packaging

Specific single use plastics

Phase 2

2026 Reporting
(For 2025 year)

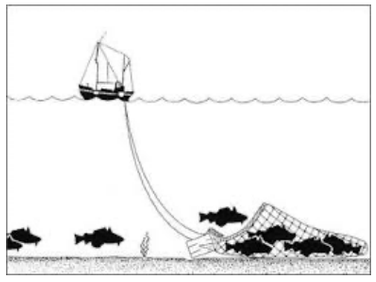
Professional Electronics
Including medical devices

Professional Packaging

Apparel & Textiles

Transportation

Construction



Fishing
And agriculture

What has to be reported -

- Plastics Packaging

Table 7 – Information Requirements for Producers of Plastic Packaging

Reporter	Item	Reporting Requirements	Information to be Reported
A producer of plastic packaging	Packaging destined for the residential waste stream	Total quantity, in kilograms, of all plastic packaging that is: (a) manufactured in Canada, if any, (b) imported into Canada, if any, and (c) placed on the market in Canada and in each province and territory	Resin type(s) Resin source(s) Category of packaging Subcategory of packaging Waste stream Quantity of each resin in packaging manufactured in Canada (kg) Quantity of each resin in packaging imported into Canada (kg) Quantity of each resin in packaging placed on the market in Canada (kg) Methods used to determine quantities

Residential

Not institutional

Canadian Plastic Reporting NAPCS Codes (Resin Type)

- **From Statistics Canada Listings**

Table 6 – Resin Types by Code

ASTM RIC (1 - 7)	Full Resin Title	NAPCS code
#1: PET	Polyethylene terephthalate (PET) resins	2811211
#2: HDPE	High-density polyethylene (HDPE) resins	2811223
#3: PVC	Polyvinyl chloride (PVC) resins	2811292
#4: LDPE	Low-density polyethylene (LDPE) resins	2811221
#5: PP	Polypropylene (PP) resins	2811293
#6: PS	Polystyrene (PS) resins	2811231
#7: Other	Other thermoplastic polyester resins	2811219
#7: Other	Linear low-density polyethylene (LLDPE) resins	2811222
#7: Other	Other polyethylene resins	2811229
#7: Other	Acrylonitrile-butadiene-styrene (ABS) resins	2811291
#7: Other	Thermoplastic polyurethane (TPU) resins	2811294
#7: Other	Polyamide (PA, nylon) resins	2811295
#7: Other	All other thermoplastic resins, n.e.c*.	2811299
#7: Other	Bio-based thermoplastic resins	2811411
None	Phenolic (PF) resins	2811311
None	Urea formaldehyde (UF) resins	2811312
None	All other formaldehyde-based resins	2811319
None	Thermosetting unsaturated polyester (UPR) resins	2811391
None	Thermosetting polyurethane (PU) resins	2811392
None	Other thermosetting resins, n.e.c.	2811399
None	Bio-based thermoset resins	2811413

Not just the usual 6

*n.e.c. means "not elsewhere classified". These categories should only be used for plastics that are not covered in the other resin groups (for example, polycarbonate).

What has to be reported -

Table 7 – Information Requirements for Producers of Plastic Packaging

Reporter	Item	Reporting Requirements	Information to be Reported
A producer of plastic packaging	Packaging destined for the residential waste stream	Total quantity, in kilograms, of all plastic packaging that is: (a) manufactured in Canada, if any, (b) imported into Canada, if any, and (c) placed on the market in Canada and in each province and territory	Resin type(s) Resin source(s) Category of packaging Subcategory of packaging Waste stream Quantity of each resin in packaging manufactured in Canada (kg) Quantity of each resin in packaging imported into Canada (kg) Quantity of each resin in packaging placed on the market in Canada (kg) Methods used to determine quantities

What has to be reported -

- Electronics

Reporter	Item	Reporting Requirements	Information to be Reported
A producer of plastic products	Plastic products destined for the residential waste stream	Total quantity, in kilograms, of all plastic products that are:	Resin type(s)
		(d) manufactured in Canada, if any,	Resin source(s)
		(e) imported into Canada, if any, and	Category of plastic products
		(f) placed on the market in Canada and in each province and territory	Subcategory of plastic products
			Waste stream
			Quantity of each resin in plastic products manufactured in Canada (kg)
			Quantity of each resin in plastic products imported into Canada (kg)
			Quantity of each resin in plastic products placed on the market in Canada (kg)
			Methods used to determine quantities

Residential

Not institutional

Example Ikea Product

- Example **individual product** output

Havris Hanging Lamp

And this has to be rolled up with

Product				
Date Eval				
Product W				
Plastic Co				
Method used	Specific component identification method			
	Product	**Textiles**		**Packaging**
	g	**g**	**%**	**g**
2811211 Polyethylene terephthalate (PET) resins	21.54	0	5.22%	0
2811219 Other thermoplastic polyester resins	6.02	0	1.46%	0
2811221 Low-density polyethylene (LDPE) resins	0.00	0	0.00%	1.41
2811222 Linear low-density polyethylene (LLDPE) resins	0.00	0	0.00%	0
2811223 High-density polyethylene (HDPE) resins	0.00	0	0.00%	0
2811229 Other polyethylene resins	13.40	0	3.24%	0
2811231 Polystyrene (PS) resins	0.02	0	0.01%	0
2811291 Acrylonitrile-butadiene-styrene (ABS) resins	0.00	0	0.00%	0
2811292 Polyvinyl chloride (PVC) resins	96.47	0	23.36%	0.75
2811293 Polypropylene (PP) resins	0.88	0	0.21%	0
2811294 Thermoplastic polyurethane (TPU) resins	0.00	0	0.00%	0
2811295 Polyamide (PA, nylon) resins	0.30	0	0.07%	0
2811299 All other thermoplastic resins, n.e.c.	59.97	0	14.52%	0
2811411 Bio-based thermoplastic resins	0.00	0	0.00%	0
2811				
2811				
2811				
2811				
2811392 Thermosetting polyurethane (PU) resins				0
2811399 Other thermosetting resins, n.e.c.				0
2811413 Bio-based thermoset resins				0
Total Weight (Plastics)				2.16
Gross Weight (Plastics) - Product, Textiles, and Packaging				

Cable Internals (Model)

White clip

Material

Ceiling cord set:
PVC

Hanger:
Acetal plastic

50% recycled)

All lighting appliances sold in 2024

For each plastic

Example (Simple) Report
Packaging only

- From Guidance
  - Only a single plastic

Table 10 – Sample data to be reported for example 2

Phase 1 Reporting Requirements	Pasta maker would report on unfilled packaging they import for their brand	Pasta maker would report for their own filled brand packaging that they place on the market
Category	Packaging	Packaging
Subcategory	Unfilled – flexible, food contact	Filled – flexible, food contact
Resin Type	2811221 – low-density	2811221 – low-density
Quantity of plastic (kg) imported into Canada	5000 kg	0 kg
Quantity of plastic (kg) manufactured in Canada	0 kg	5000 kg
Quantity of plastic placed on the market in each province/territory	0 kg	AB: 1000 kg; BC: 1000 kg; ON: 2000 kg; QC: 1000 kg

But who imports only a single pasta?

Example (Simple) Report Electronics (consumer)

- From Guidance
  - Only a single plastic in the electronics….

Phase 1 Reporting Requirements	Manufacturer would report on plastic in their stereos	Manufacturer would report on plastic in their stereo packaging
Category	Electronics and Electrical Equipment (EEE)	Packaging
Subcategory	Electronic or electrical audiovisual and consumer equipment or media	Filled – flexible, other
Resin Type	2811223 – high-density polyethylene resins (HDPE)	2811221 – low-density polyethylene resins (LDPE)
Resin Source	Virgin fossil-based resin	Virgin fossil-based resin
Quantity of plastic (kg) imported into Canada	0 kg	0 kg
Quantity of plastic (kg) manufactured in Canada	1500 kg	500 kg
Quantity of plastic placed on the market in each province/territory	BC: 800 kg; AB: 700 kg	ON: 300 kg; QC: 200 kg

But since when is a stereo ONE plastic?

Example Ikea Product

- Example **individual product** output

Product	Hanging Lamp Cord Ikea Samples			
Date Evaluated	10/2/2024			
Product Weight (including packaging in g)	413			
Plastic Compositon	48.61%			
Method used	Specific component identification method			
	Product	**Textiles**		**Packaging**
	g	**g**	**%**	**g**
2811211 Polyethylene terephthalate (PET) resins	21.54	0	5.22%	0
2811219 Other thermoplastic polyester resins	6.02	0	1.46%	0
2811221 Low-density polyethylene (LDPE) resins	0.00	0	0.00%	1.41
2811222 Linear low-density polyethylene (LLDPE) resins	0.00	0	0.00%	0
2811223 High-density polyethylene (HDPE) resins	0.00	0	0.00%	0
2811229 Other polyethylene resins	13.40	0	3.24%	0
2811231 Polystyrene (PS) resins	0.02	0	0.01%	0
2811291 Acrylonitrile-butadiene-styrene (ABS) resins	0.00	0	0.00%	0
2811292 Polyvinyl chloride (PVC) resins	96.47	0	23.36%	0.75
2811293 Polypropylene (PP) resins	0.88	0	0.21%	0
2811294 Thermoplastic polyurethane (TPU) resins	0.00	0	0.00%	0
2811295 Polyamide (PA, nylon) resins	0.30	0	0.07%	0
2811299 All other thermoplastic resins, n.e.c.	59.97	0	14.52%	0
2811411 Bio-based thermoplastic resins	0.00	0	0.00%	0
2811412 Petroleum-based biodegradable thermoplastic resins	0.00	0	0.00%	0
2811311 Phenolic (PF) resins	0.00	0	0.00%	0
2811312 Urea formaldehyde (UF) resins	0.00	0	0.00%	0
2811319 All other formaldehyde-based resins	0.00	0	0.00%	0
2811391 Thermosetting unsaturated polyester (UPR) resins	0.00	0	0.00%	0
2811392 Thermosetting polyurethane (PU) resins	0.00	0	0.00%	0
2811399 Other thermosetting resins, n.e.c.	0.00	0	0.00%	0
2811413 Bio-based thermoset resins	0.00	0	0.00%	0
Total Weight (Plastics)	198.6	0	48.09%	2.16
Gross Weight (Plastics) - Product, Textiles, and Packaging	200.8			

Havris Hanging Lamp

Ring holder

Cable Internals (Model)

White clip

Material

Ceiling cord set:
PVC

Hanger:
Acetal plastic

Lampholder cup:
Polycarbonate plastic (min. 50% recycled)

Shade ring:
Polyester

Slightly more detailed version

- From Guidance
  - Electronics

Category	Subcategory	Waste Stream	Resin	Resin Source	Quantity Manu-factured in Canada (kg)	Quantity Placed on Market in Canada (kg)
Electronic and Electrical Equipment	Electronic or electrical tools, other than large-scale stationary industrial tools	Residential	2811291 – acrylonitrile-butadiene-styrene resins	Virgin fossil-based conventional resin	250400	230226
Electronic and Electrical Equipment	Electronic or electrical tools, other than large-scale stationary industrial tools	Residential	2811299 – all other thermoplastic resins	Virgin fossil-based conventional resin	98400	90472
Electronic and Electrical Equipment	Electronic or electrical tools, other than large-scale stationary industrial tools	Residential	2811292 – polyvinyl chloride resins	Virgin fossil-based conventional resin	6400	5884
Electronic and Electrical Equipment	Electronic or electrical tools, other than large-scale stationary industrial tools	Residential	2811295 – polyamide resins	Virgin fossil-based conventional resin	125600	115481

Methods Allowed

- **Specific component identification method**
  - Identification of every single plastic in every product

Simple packaging only

- **Average bill of materials method**
  - Creating an average bill of materials from all products of the same ‘type’

Starting point for electronics

- **Fixed Factor method**
  - Creating a representative plastic declaration for a product type
  - More sustainable year over year

The most common method for electronics

Supplier data gathering

- **We could just get the data from our suppliers**

- To a highly complex new standard
- For data they do not have
  - Actually - basically every supplier does **not** have
- Using a plastic coding system they are not familiar with
- For a deadline in 7 months
- Where you need the data months in advance to combine with sales data

To RECAP

New

Average project

d submission is due..

In 7 MONTHS!

Guide for Reporting to the Federal Plastics Registry

Phase 1

Clock is ticking…

Is that deadline real?

- **This was just sent by the Canadian government to all Canadian companies at noon <u>today</u>**

***Federal Plastics Registry:* Are you ready for Phase 1 reporting in September 2025?**

Hello,

The Federal Plastics Registry (FPR) is a **mandatory** Government of Canada initiative aimed at assembling an inventory of data on plastics in the Canadian economy.

September 29, 2025 is the reporting deadline for Phase 1. By that date, producers (which may include retailers, importers and manufacturers) must submit reports for the following items:

- plastic packaging (filled and unfilled)
- electronics and electrical equipment (EEE)
- single-use or disposal products

If you or your organization produced these items in 2024, you must begin collecting the following information to be prepared for the upcoming deadline.

Administrative Information: ○ Business number (BN) issued by the Canadian Revenue Agency (CRA) ○ Address ○ Contact information ○ Six-digit North American Industry Classification System (NAICS) Canada codes ○ Provincial and territorial Extended Producer Responsibility (EPR) programs that you participate in ○ Provincial and territorial stewardship programs that you participate in ○ Producer Responsibility Organizations (PROs) you engage with, and the provinces and territories where these PROs operate on your behalf
The total quantity (in kilograms) of plastic packaging and products, by resin, resin source, category and subcategory, that are destined for the residential waste stream and that are: ○ manufactured in Canada ○ imported into Canada ○ placed on the market in Canada in each province and territory
The method used to determine the quantities referred to in the bullets above.

Real.

<u>Mandatory</u>

Summary

- **New Guidance Available**
  - Will be distributed with slides

New guidance!

And submission is due..

In 7 MONTHS!

Q&A

https://www.claigan.com/contact-us/
info@claigan.com