



FEDERAL PLASTICS REGISTRY:

May 2026



OUR MISSION

To inspire and support organizations to implement leading edge, new world solutions for sustainable resource management.

WHAT WE DO

RecycleMe (U.S.) and **Reclay StewardEdge (Canada)** are part of the global **Raan Group**. Our team of experts are relied upon by some the world's leading brands to help them achieve the most sustainable product packaging for their customers. In doing so, brands are also guaranteed to meet the highest standards in Extended Producer Responsibility (EPR) requirements around the world.

FULL-SERVICE PRO AND CONSULTING EXPERTISE

BY THE NUMBERS

2002
Founded

10
Locations

250+
Colleagues

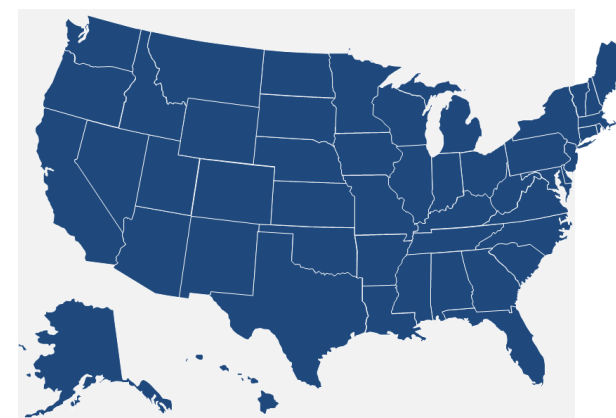
270M+
Turnover



PRO + CONSULTING
IN EUROPE



PRO + CONSULTING
IN CANADA



CONSULTING IN US

Decades of experience in advising **INDUSTRY**
on the implications of EPR policies

Our Experts



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Disclaimer

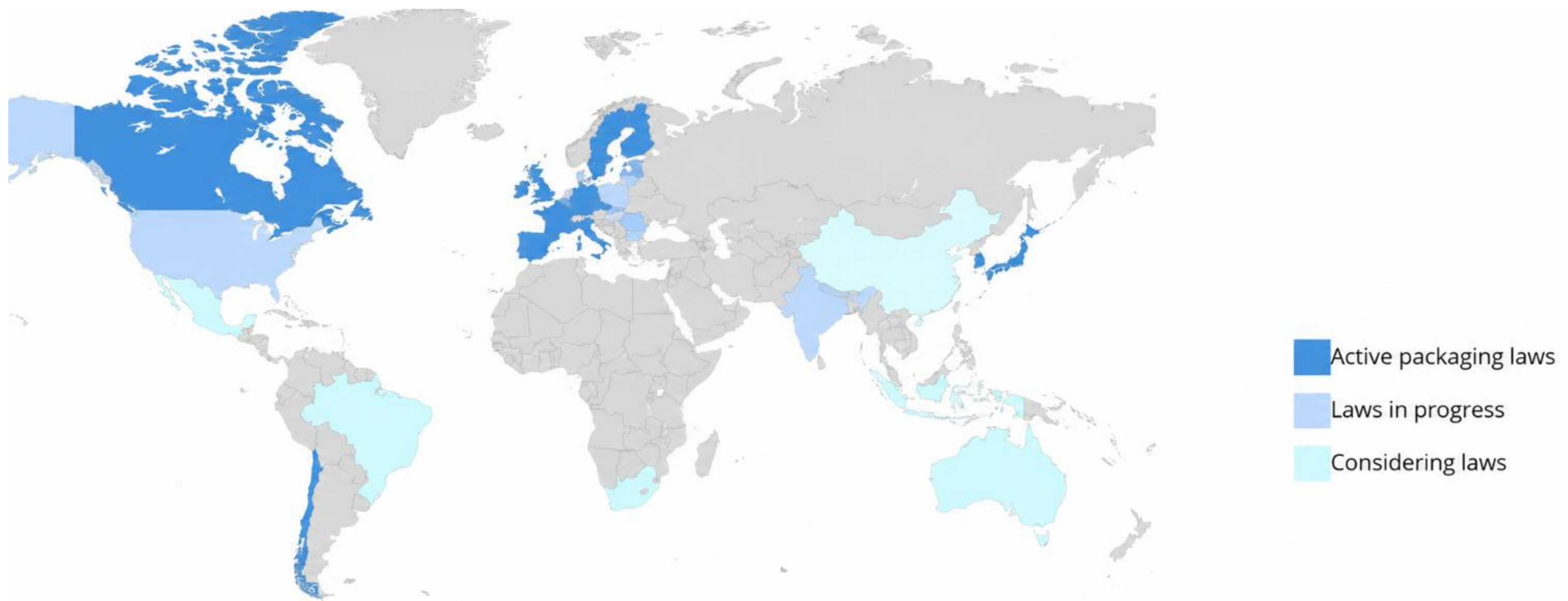
Regulatory legislation in North America is evolving rapidly.

RecycleMe / Reclay StewardEdge has made every effort to ensure the accuracy and timeliness of the information provided; however, it is intended for general informational purposes only and should not be interpreted or relied upon as legal advice.

Extended Producer Responsibility (EPR): A Global Program

- The goal of Extended Producer Responsibility (EPR) for packaging is to **reduce packaging volumes, increase recycling/collection, improve recyclability and support circular design.**
- EPR is no longer niche, it's becoming standard policy in major markets. The EU's proposed **Packaging & Packaging Waste Regulation (PPWR)** was introduced in 2025 and represents one of the largest overhauls of packaging law in decades; similar programs are being implemented or proposed in the UK, Canada, the US (state-by-state), India, China and elsewhere.
- On a local level, **EPR represents a shift from municipal to producer-funded waste management:** governments are requiring producers to finance/operate end-of-life management for packaging and to stimulate better design and system innovation.

Extended Producer Responsibility (EPR) for Packaging is Global, and Gaining Momentum



OVERVIEW OF THE FEDERAL PLASTICS REGISTRY(FPR)

Launched By

Environment and Climate Change Canada (ECCC)

Legal Basis for Collection

Notice with respect to reporting of plastic resins and certain plastic products for the Federal Plastics Registry for 2024, 2025 and 2026 published in the Canada Gazette, Part I on April 20, 2024

Objective & Information Collected Under:

Drive Canada's zero-plastic waste agenda
Subsection 46(1) of the CEPA

Phase 1 Reporting Deadline (for 2026)

September 29, 2026 (for 2025 data)

Penalty for Non-Compliance

Under CEPA Section 46, businesses that fail to report or submit false information can face significant fines:

- Up to \$25,000 for individuals (summary conviction)
- Up to \$500,000 for large corporations (indictment)

WHAT WE HEARD FROM ECCC

- Launched By
1. FPR isn't going away but it is evolving
 2. The delay for Phases 2 and 3 is intended to allow more time to fix the system
 3. The notice for Phases 2 and 3 is expected this summer
 4. Compliance and enforcement
 5. Data transparency



OVERVIEW OF THE FEDERAL PLASTICS REGISTRY (FPR)

Who is Obligated to Report?

Producers of Plastic Products

A person that imports, manufactures, and places plastic on the market in Canada in the residential waste stream (Phase 1)



OVERVIEW OF THE FEDERAL PLASTICS REGISTRY(FPR)



Table 1 - 2026 Reporting Obligations (2025 Data)

CATEGORY - To be reported by September 29, 2026 (with 2025 data)	Quantity of Plastic (residential stream): a) Imported b) Manufactured c) Placed on the market
Plastic Packaging , filled and unfilled	Yes
Electronic and Electrical Equipment	Yes
Single-use or disposable products	Yes

Note: Focus on materials that end up in residential waste streams
Producers placing **over 1,000 kg** of plastic on the Canadian market annually.

Both primary (direct contact) & secondary (outer bags, plastic wrapping) packaging must be reported, Tertiary packaging (used for transport) is not included in Phase 1



DATA & REPORTING REQUIREMENTS

Key data to collect & report for each type of plastic packaging

1. Quantity of Plastic (in kilograms) that was:

- Imported
- Manufactured
- Placed on the Canadian Market

2. Resin Type (NAPCS Codes):



3. Resin Source

- E.g. Virgin fossil-based, post-consumer recycled

4. Packaging Type

- Flexible or rigid
- Filled or unfilled

5. Calculation Method Used

- Specific Component Identification
- Average Bill of Materials (ABOM)
- Fixed Factor Calculation

6. Provincial Distribution

- Where the plastic is placed on the market in Canada
- Overall Canada volume

EPR vs FPR REPORTING DIFFERENCE

Aspect	EPR	FPR
Categories of plastic	10 Categories of plastic	21 categories of plastic
Jurisdiction	Provincial	National and Provincial
Producer Responsibility	Based on provincial regulations	Brand-owner (Resident in Canada) → First importer into Canada
Recyclability content	Not applicable	Mandatory by resin type
Data Granularity	High-level Reporting (e.g. Total plastic tonnage by category)	Detailed breakdown by resin type, resin source, weight, provincial distribution, and product subcategory



NORTH AMERICAN PRODUCT CLASSIFICATION SYSTEM (2022)

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

21 Categories of
Plastic Types

CALCULATION METHODS

**Specific Component
Identification
Method**

**Average Bill of
Materials (ABOM)
Method**

**Fixed-Factor
Calculation Method**



THE REALITY CHECK

► Phase 1 is Active, Mandatory, and Enforced

- Phase 1 requirements remain fully in effect and unchanged. Companies that submitted data last year are legally expected to report again this year.
- ECCC has built a comprehensive database of expected reporters by cross-referencing publicly available data, including provincial EPR registries (e.g., Ontario's RPRA). If you are registered provincially or are on the federal FPR mailing list, you are already on their radar.
- Reporting is mandatory under CEPA. While ECCC is leading with an "education-first" approach, enforcement mechanisms are live and will be utilized for non-compliance.
- The regulatory reporting platform for last year's data remains open. If your organization missed the previous deadline, filing late is vastly better than remaining non-compliant.



PHASES 2 & 3

► The Phase 2 & 3 Strategic Pause

- ECCC admits that the Phase 1 rollout involved a steep learning curve plagued by a difficult portal, guideline gaps, and widespread confusion (such as the filled vs. unfilled packaging distinction).
- The regulator has actively listened to direct feedback from industry stakeholders regarding these challenges and is continuing to hold dedicated sessions to gather further input.
- The delay for Phases 2 and 3 is a strategic pause to fix these systematic issues, reduce regulatory burden, and streamline the process.
- Phases 2 and 3 will officially resume in 2028 to collect 2027 data. Moving forward, ECCC promises that updated legal notices and technical guidance documents will be released together, giving companies one full year to collect data before reporting the following year.



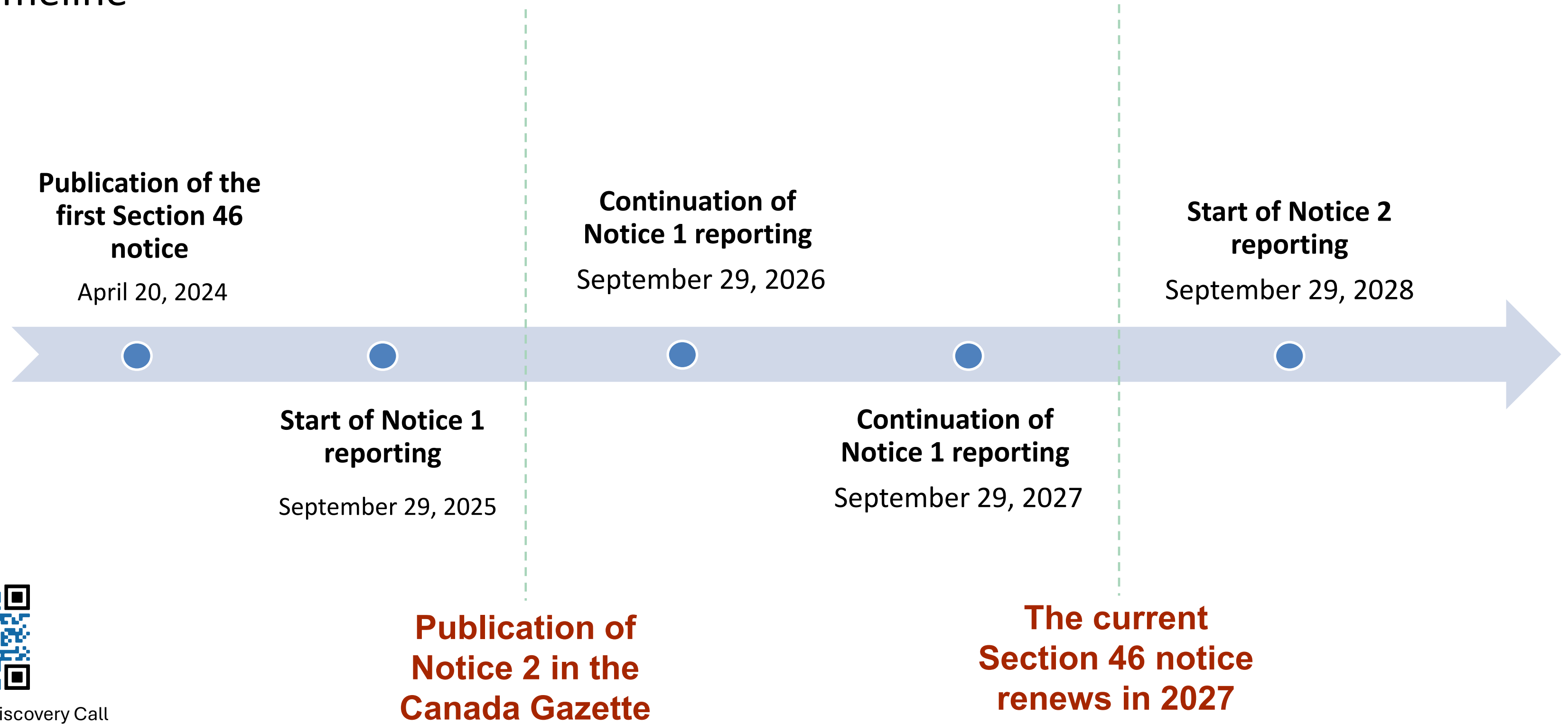
Federal Plastics Registry

Phase 2 and 3 Delay

CATEGORY	Quantity of resin: a) imported b) manufactured c) placed on the market	Quantity of plastic (residential stream): a) imported b) manufactured c) placed on market in Canada	Quantity of plastic (ICI and CRD stream): a) imported b) manufactured c) placed on market in Canada	Quantity of plastic waste generated at an ICI facility	Quantity of plastic managed by a service provider
Resins	2027, 2028, 2029	-	-	-	-
Plastic packaging	-	2024, 2025, 2026	2027, 2028, 2029	2027, 2028, 2029	2027, 2028, 2029
Electronic and electrical equipment	-	2024, 2025, 2026	2027, 2028, 2029	2027, 2028, 2029	2027, 2028, 2029
Single-use or disposable products	-	2024, 2025, 2026	2027, 2028, 2029	2027, 2028, 2029	2027, 2028, 2029
Agriculture and horticulture	-	2027, 2028, 2029	2027, 2028, 2029	2027, 2028, 2029	2027, 2028, 2029
Tires	-	2027, 2028, 2029	2027, 2028, 2029	2027, 2028, 2029	2027, 2028, 2029
Transportation	-	2027, 2028, 2029	2027, 2028, 2029	2027, 2028, 2029	2027, 2028, 2029
Construction	-	2027, 2028, 2029	2027, 2028, 2029	2027, 2028, 2029	2027, 2028, 2029
Fishing and aquaculture	-	2027, 2028, 2029	2027, 2028, 2029	2027, 2028, 2029	2027, 2028, 2029
Apparel and textiles	-	2027, 2028, 2029	2027, 2028, 2029	2027, 2028, 2029	2027, 2028, 2029

Federal Plastics Registry

Timeline



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Strategic Opportunity for Organizations

The delay creates a **planning window**, not downtime

What Organizations Can Focus On Now

- Build a **solid data foundation** that supports long-term FPR compliance
- Improve **visibility and consistency** of plastics-related information across products and suppliers
- Enhance **internal processes and systems** to simplify future reporting
- Prepare **documentation and traceability frameworks** to support audit readiness

*Tip: Reduce future time pressure by addressing foundational work **in advance**.*



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WHAT THE EVOLVING RULES MIGHT LOOK LIKE

► Revision and Consultations Underway

- A revised notice detailing the new framework for Phases 2 and 3 is expected in Summer 2026.
- Active consultations are happening right now, and early signals show that future obligations will look significantly different than originally published. For example, for Industrial, Commercial, and Institutional (ICI) waste generators, ECCC might be considering:
 - Less granular reporting requirements in highly complex areas.
 - Narrowing the scope to specific sectors (e.g., manufacturing only, while excluding back-of-house operations).
 - Raising the de minimis thresholds or introducing simplified reporting paths.
 - Restructuring how secondary and tertiary packaging are reported for ICI waste streams.



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IMPLICATIONS FOR PRODUCERS

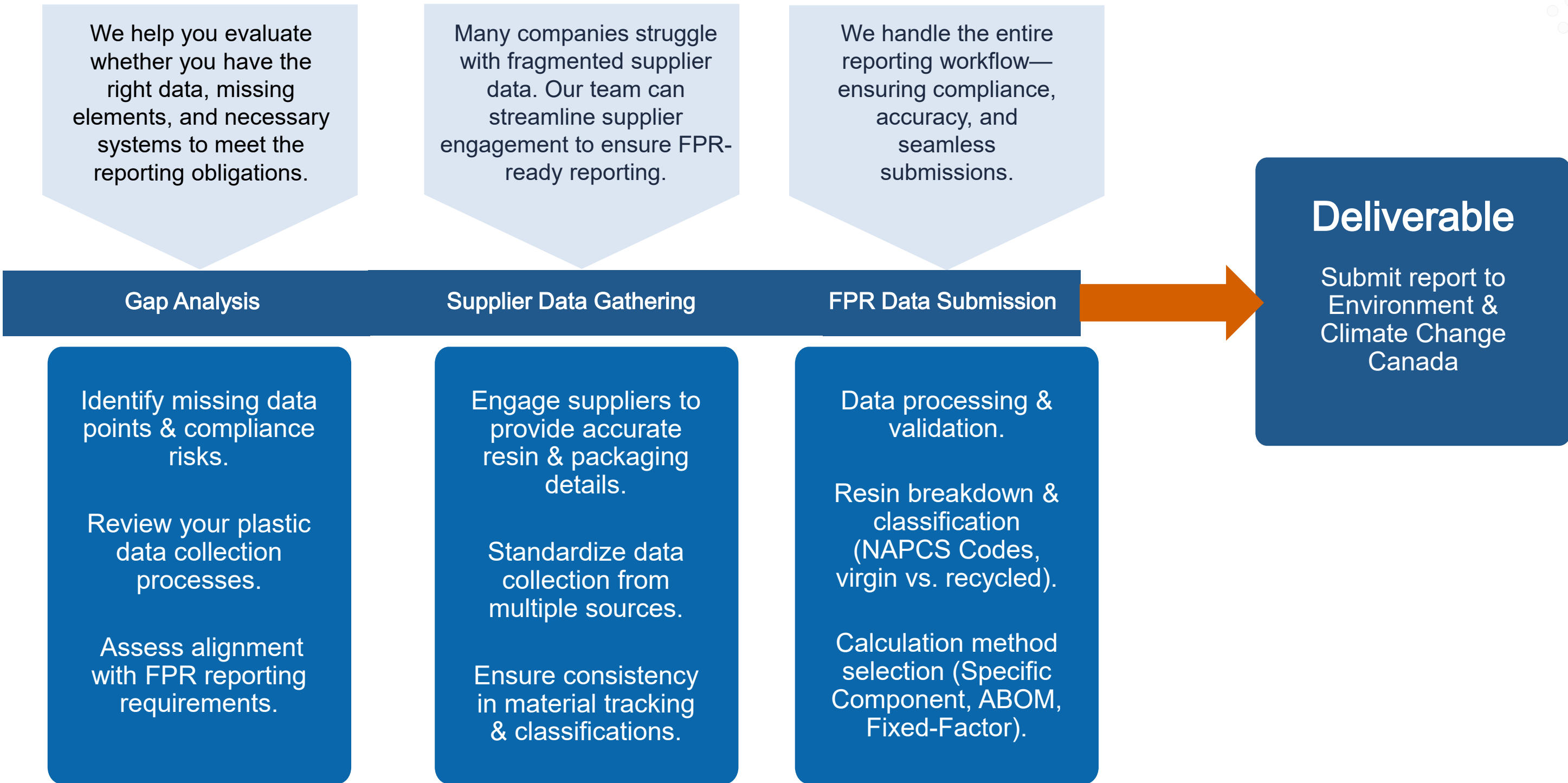
Proactive data
readiness is a
competitive
advantage

Cross-departmental
collaboration is
critical

Opportunities in
innovation and cost-
saving



REPORTING AND COMPLIANCE SERVICES



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Combined North American Consulting

Our combined North American consulting services can seamlessly extend your support across borders



Mexico:* In **January 2026, Mexico enacted the **General Law on Circular Economy (LGEC)**.

- EPR Consulting
- Policy Monitoring
- Registrations & Declaration Across U.S. States
- Data Gathering & Reporting
- Federal Plastics Registry (Canada)
- PRO Review
- Deposit Return Scheme (DRS) "Bottle Bill" Consulting
- EPR Readiness Assessments
- Fee Mitigation / Optimization
- Packaging Transformation
- California SB 54: Independent Source Reduction Plan

We provide fully integrated coverage across North American markets



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With a proven track record and **decades of experience**,
we find and implement impactful **tailored-made solutions**
because your business is unique.

QUESTIONS



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Appendix



APPENDIX – CALCULATION METHODS

Method 2: Average Bill of Materials (ABOM)

- Uses a standard weight per unit of packaging based on historical data or product specs
- Good for products that don't change often

Example:

A cotton swab importer reports on plastic sticks and packaging:

- They use an ABOM method where each swab stick is 0.3g of PP plastic
- If they import 10 million swabs, they report 3,000 kg of PP plastic



APPENDIX – CALCULATION METHODS

Method 3: Fixed Factor Calculation

- Uses industry-wide estimates or conversion factors for plastic weight
- Often less precise but better than no data

Example:

An electronics manufacturer reports on plastic in a device

- Instead of analyzing each device, they apply a fixed industry factor:
 - Each device contains 10% plastic (ABS resin)
- If they produce 12,000 kg of devices, they estimate 1,200 kg of ABS plastic