

April 28, 2026

The Honourable Julie Dabrusin, P.C., M.P.
Minister of the Environment, Climate Change and Nature
House of Commons
Ottawa, Ontario
K1A 0A6

Sent via email: ministre-minister@ec.gc.ca

Re: On-Farm Plastics Reporting Requirements in Phase II of the Federal Plastics Registry

Dear Minister Dabrusin,

On behalf of leaders and stakeholders across Canada's agriculture and agri-food sector, we are writing to provide input on Phase II of the Federal Plastics Registry and request an exemption for farmers—including aquaculture operations—from farm-level reporting requirements. In light of the Government of Canada's recent decision to delay implementation, this presents a timely opportunity to ensure the framework reflects the practical realities of Canadian farm operations while continuing to support food security and the sustainable management of agricultural production.

Canadian farmers rely on plastics for a wide range of uses, including producing and protecting crops, increasing yields, reducing water demand, preserving harvested materials, supporting greenhouse production, enabling livestock identification and traceability, and facilitating primary processing. These plastics include grain bags, bale wrap, twine, ground cover, silage covers, chemical jugs and totes, bottles, labels, ear tags, breeding equipment, irrigation tubing and water lines, as well as personal protective equipment such as gloves, boots, masks, and goggles, in addition to other containers and farm infrastructure. Producers are committed to responsible management and to working collaboratively with governments and industry partners to improve recycling, recovery, and responsible end-of-life outcomes.

However, the proposed Phase II reporting requirements would impose significant administrative burden on farmers, while offering limited additional information beyond what is already reported through existing supply chain mechanisms.

As currently envisioned, Phase II may require individual farms to report the quantity of plastics used on their operations. Because similar data is already collected and can be more easily obtained from manufacturers and suppliers, this approach risks creating a duplicative and inefficient reporting system. It could generate thousands of individual farm reports, increasing the administrative burden on both producers and government, and diverting time and resources away from core farm activities. A more streamlined approach would better balance environmental objectives with the realities of farm operations.

Rather than introducing new reporting obligations at the individual farm-level, we encourage the government to exempt farmers—both land-based and aquatic—from these requirements and instead pursue more efficient data collection approaches for agricultural plastics. The current pause provides an important opportunity to refine the framework and avoid unintended burden on producers.

In light of this, we recommend:

- The government exempt farmers—both land-based and aquatic—from farm-level reporting requirements and collect the information upstream and downstream from agricultural operations.
- Leverage existing data collected from agricultural plastics manufacturers and suppliers already subject to registry reporting requirements.
- Work collaboratively with agricultural organizations and industry partners to identify alternative mechanisms for collecting any additional data that may be required.

This approach would support the objectives of the Federal Plastics Registry while minimizing duplication and unnecessary burden. It would also align with the government’s commitment to reducing red tape and ensuring that regulatory frameworks are practical and effective.

Canada’s agricultural sector remains committed to working with the Government of Canada to improve the management and recovery of agricultural plastics. We would welcome the opportunity to discuss these recommendations further.

Thank you for your consideration.

Sincerely,

Canadian Aquaculture Industry Alliance
Canadian Canola Growers Association
Canadian Cattle Association
Canadian Federation of Agriculture
Canadian Honey Council
Canadian Ornamental Horticulture Alliance
Canadian Pork Council
Canadian Sugar Beet Producers Association

Dairy Farmers of Canada
Fruit and Vegetable Growers of Canada
Grain Growers of Canada
Mushrooms Canada
National Cattle Feeders’ Association
National Sheep Network
Ontario Greenhouse Vegetable Growers
Turkey Farmers of Canada

