

September 16, 2020

Prime Minister Justin Trudeau  
House of Commons  
Ottawa, Ontario, Canada  
K1A 0A6

**Re: Federal Government plan to ban single-use plastics and declare them  
toxic under the Canadian Environmental Protection Act Single Use Plastics  
Toxic**

Dear Prime Minister:

I am writing on behalf of the Flexible Packaging Association (FPA), who is the voice of U.S. manufacturers of flexible packaging and their suppliers, regarding the above referenced proposed ban on single-use plastics and declaration as toxic under the Canadian Environmental Protection Act (CEPA). This is a follow-up letter to FPA's earlier submission on the Government of Canada's Draft Science Assessment of Plastic Pollution (Draft), published in the Gazette Part 1 on February 1, 2020 under CEPA, 1999, where FPA expressed the same concerns.

Flexible packaging represents over \$31 billion in annual sales in the U.S. and is the second largest, and fastest growing segment of the packaging industry. The industry employs approximately 80,000 workers in the United States. Flexible packaging is produced from paper, plastic, film, aluminum foil, or any combination of these materials, and includes bags, pouches, labels, liners, wraps, rollstock, and other flexible products. Many of our member companies conduct commercial operations in both the United States and in Canada and Canada is one of our industries biggest trading partners. We are deeply concerned that the Canadian government has not undertaken a proper scientific assessment required by law of the toxicity of these plastics. In addition, the government has not examined the impact this will cause to the Canadian economy once plastic becomes a dangerous good. And, this will greatly impact the USMCA trade agreement, cross border supply chains, and the safety of food supply and the workplace.

Flexible packaging is represented in products that you and I use every day – including hermetically sealed food and beverage products such as cereal, bread, frozen meals, infant formula and juice; as well as sterile health and beauty items and pharmaceuticals, such as aspirin, shampoo, feminine hygiene products and disinfecting wipes. Even packaging for pet food uses flexible packaging to deliver fresh and healthy meals to a variety of animals. Flexible packaging is also used for medical device packaging to

ensure that the products packaged, diagnostic tests, IV solutions and sets, syringes, catheters, intubation tubes, isolation gowns and other personal protective equipment, maintain their sterility and efficacy at the time of use. Trash and medical waste receptacles use can liners to manage business, institutional, medical and household waste. Carry-out and take-out food containers and e-commerce delivery are also heavily supported by the flexible packaging industry.

Thus, FPA and its members are vital to the supply chain when addressing the needs of US consumers in responding to the COVID-19 crisis. It is with this responsibility that FPA wants to express its opposition and significant concerns about the broader impacts of this policy. FPA believes that it will result in permanent job losses, health risks to workers and consumers and increasing costs to the retail sector – all at a time when we are trying to recover from the devastating impact of COVID-19 on businesses.

Plastic pollution is a waste management issue that needs local, on the ground solutions. The Canadian federal government has an opportunity to show real and effective leadership by working collaboratively with the provinces to improve waste management systems, expand extended producer responsibility regimes and implement anti-littering public education. More extensive consultation is also required with workers, manufacturers, retailers, consumer product companies, health professionals and the plastics industry to examine the impacts and alternatives to this policy.

Sincerely,



Alison A. Keane, Esq., CAE, IOM  
President & CEO

\*\* Submitted electronically by email at [justin.trudeau@parl.gc.ca](mailto:justin.trudeau@parl.gc.ca) \*\*

Cc: Jonathan Wilkinson, Minister of Environment and Climate Change @  
[Jonathan.Wilkinson@parl.gc.ca](mailto:Jonathan.Wilkinson@parl.gc.ca)  
Melanie Joly, Minister Economic Development and Official Languages @  
[Melanie.Joly@parl.gc.ca](mailto:Melanie.Joly@parl.gc.ca)  
Patty Hajdu, Minister of Health @  
[Patty.Hajdu@parl.gc.ca](mailto:Patty.Hajdu@parl.gc.ca)  
Mary Ng, Minister of Small Business and Export Promotion @  
[Mary.Ng@parl.gc.ca](mailto:Mary.Ng@parl.gc.ca)