## Subject: Support for a permanent recycling program for grain bags and twine

## November 19, 2025

Dear Agricultural Plastics Recycling Group:	
On behalf of	I am pleased to provide this letter of support in endorsement of
a permanent. Alberta wide i	recycling program for agricultural plastics, including grain bags and twine.

The Alberta Ag Plastic: Recycle It! pilot has trialed logistics and shown the validity and results that a permanent program could achieve. There are currently 160 collection sites across the province. In the 72 months of the pilot, over 4100 tonnes of grain bags and 667 tonnes twine have been collected for recycling – diverting this material from potential landfill disposal or on-farm burning. The pilot has also fostered the start of a new grain bag recycling facility in Bashaw – Revolution Plastics (formerly PolyAg Recycling), while plastics also continue to be processed at a facility near Bassano. Both operations have diverted waste and created local jobs processing plastic back into feedstock for remanufacturing.

The establishment of a permanent program will allow our producers to have a responsible and sustainable method of disposal for their agricultural plastics at end of use. We support the use of an Extended Producer Responsibility (EPR) model for this purpose. We understand the need and benefits of a user pay model that is run by industry, however there are some central concerns that need to be addressed prior to any legislation. These include:

- 1. Ensuring that all producers across the province have access to recycling sites to help ensure higher collection rates and provide equity among producers
- 2. Need for transparency on any fees that may be attached to plastics at point of purchase as part of a recycling program as well as the need for financial transparency and accountability of the program.
- 3. Ability for additional agricultural plastics to be added as needed

Manitoba and Saskatchewan have developed permanent agricultural plastic recycling programs that seem to be well supported by their producers. Both programs are an EPR and provide some insight into the benefits of using EPR frameworks for agriculture plastics. Some known benefits of a permanent program include:

- 1. Social license improvements for agriculture
- 2. The development of a circular economy to encourage further innovation and technologies
- 3. Improved air quality and regulation compliance (burning plastics is illegal under the Substance Release Regulation of the Alberta Environmental Protection and Enhancement Act)

In summary, our recommendations for next steps include:

- the advancement of a permanent program including harmonization with legislation for agricultural plastics in neighbouring provinces;
- the flexibility to add materials (i.e., other ag plastics) to the regulation over time;
- transparency and accountability for all stakeholders; and
- the establishment of a plan with the Alberta Government to assess the funding and transition plan from the pilot to a permanent program.

Thank you for your consideration of this important issue.

Sincerely,