



May 11, 2021

Honourable Jason Nixon  
Minister of Environment and Parks  
323 Legislature Building  
10800 - 97 Avenue NW  
Edmonton, AB T5K 2B6

Dear Minister Nixon:

The Alberta Urban Municipalities Association (AUMA) had the opportunity to review Alberta Environment and Parks' Extended Producer Responsibility (EPR) discussion paper for packaging, paper products, single-use plastics, and hazardous and special products.

AUMA has long advocated for an EPR packaging and paper program. Our advocacy included the [Alberta Collaborative EPR Study \(ACES\)](#), published in early 2020, which emphasized the many benefits of an EPR program. The report also covers municipalities' perspectives on EPR and other provinces' best practices. The research is a partnership among the Cities of Calgary and Edmonton and the Canadian Stewardship Services Alliance. We believe ACES is a good reference for Alberta Environment and Parks (AEP).

AUMA's feedback to the discussion paper is attached for your information. We also want to share a few high-level themes that have emerged from our research and discussions with our members.

### **Municipalities must be part of the decision-making**

AUMA understands that EPR legislation and regulations shift the responsibility to producers; however, municipalities must be part of the discussion and decision-making. Local governments operate major collection sites for many recycling programs. To successfully transition municipalities, we must have a say in how the transition process is designed and implemented, have adequate time to decide, and not feel forced to choose. The transition process needs to be mutually beneficial and understood by producers and municipalities.

### **Alberta should harmonize where possible**

Many provinces in Canada have already implemented EPR programs. Alberta does not need to reinvent our EPR framework and programs. AUMA has been meeting with many business and industry stakeholders, and there is agreement that provincial governments should harmonize regulations and requirements where possible. Having a similar set of rules for businesses reduces administrative burdens, creates efficiency, and generates potential commercial opportunities in Western Canada. We advocate that Alberta takes the lead by starting this dialogue with British Columbia, Saskatchewan, and Manitoba, either through existing structures such as the New West Partnership or a ministerial-level discussion.

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## **The province must fund the EPR transition for hazardous and special products (HSP)**

AUMA is concerned about who will pay for the recycling and destruction of HSP while the province is working on a permanent EPR program for HSP. Our understanding is that the current Household Hazardous Waste (HHW) grant will be reduced this year, but the new EPR program will not start until 2022 or later. Due to Alberta Infrastructure cutting back on its funding, municipalities are expected to contribute more to the destruction of HHW, making recycling of HHW unaffordable for many municipalities.

We ask the provincial government to reinstate the funding until an EPR program is in place to stop service disruptions across Alberta and to set a coordinated policy direction for Albertans. For years, AEP and municipalities have educated residents about the benefits of HHW recycling. Service disruptions only create future communication and implementation barriers for AEP, program operators, and local governments.

Thank you for listening to municipalities, and we appreciate your staff meeting with us. We look forward to working with your team to develop EPR programs in Alberta in the fall. If you would like to discuss this matter further, please feel free to contact me by email at [president@auma.ca](mailto:president@auma.ca) or my cell phone at (403) 363-9224.

Sincerely,



Barry Morishita  
AUMA President

Enclosure

- AUMA Extended Producer Responsibility Submission

cc Mr. Searle Turton, Member of Legislative Assembly, Spruce Grove-Stony Plain