April 19, 2016

Mr. Katch Koch
Clerk of the Standing Committee on Social Policy
Room 1405, Whitney Block
Queen's Park
Toronto, ON M7A 1A2
Via email: kkoch@ola.org

Subject: Comments to the Waste-Free Ontario Act (Bill 151)

Dear Mr. Koch,

The Canadian Plastics Industry Association (CPIA) appreciates the opportunity to submit comments to the Standing Committee on Social Policy with respect to the *Waste-Free Ontario Act* (Bill 151).

As we understand, the government introduced Bill 151, a proposed omnibus legislation that would enact the *Resource Recovery and Circular Economy Act, 2015* and the *Waste Diversion Transition Act, 2015* if passed, with the intention of enabling a shift to a circular economy that would increase resource recovery and waste reduction in Ontario through two primary means:

- Enabling efficient and effective collection and recycling systems; and,
- Increasing market value of recovered materials.

CPIA is interested in working in partnership with the province on solutions for plastics recycling and waste diversion that are efficient and sustainable, that provide a high level of environmental protection, and that create economic opportunities in Ontario.

Our comments below provide an overview of CPIA and the work we have done in diverting increasing volumes of plastics from landfill, our vision for further increasing plastics recycling and diversion rates in Ontario, and specific recommendations related to Bill 151.

ABOUT THE CANADIAN PLASTICS INDUSTRY ASSOCIATION

CPIA (www.plastics.ca) is the national voice for plastics in Canada. With more than 3,170 companies employing 95,400 workers, Canada's $29.2-billion plastics industry is a sophisticated, multi-faceted sector encompassing plastic products manufacturing, machinery, moulds and resins.

Plastics manufacturing and the use of plastics in a range of sectors make significant economic, social and environmental contributions in Ontario. The benefits of using plastics include product lightweighting, increased hygiene and cleanliness, decreased spoilage and food waste, durability, convenience and safety, among others. These benefits are realized in the many industries where plastics products are commonly used, such as packaging, construction/building development, automotive, aerospace, electronic equipment, and healthcare.

CPIA'S Commitment to Waste Diversion

CPIA and our members are dedicated to increasing plastics waste diversion and resource recovery efforts in Ontario through voluntary initiatives and supporting the introduction of new government legislation. CPIA has been active in the MOECC's stakeholder consultations related to Bill 151 and the draft Strategy. As the voice of the plastics industry, CPIA appreciated the opportunity to be consulted and is committed to ongoing collaboration with the MOECC and various stakeholders to increase the diversion of plastics from landfill.

Plastics products can be reused, recycled, and their energy recovered after productive use. To that end, CPIA's Sustainability program has a number of dedicated Post Use Resource Recovery projects that focus on increasing the diversion of plastics from landfill through collaborative efforts with partners and stakeholders.

Advancements in plastics diversion are important for the sustainability of the plastics industry, in addition to benefiting the economy and environment. Through increased diversion, less waste is produced with more resources generated and energy conserved. This benefits the environment by reducing greenhouse gas emissions and our overall carbon footprint.

Plastics are a valuable resource that should not be landfilled. CPIA supports the MOECC's aspirational goal of zero waste by 2030 and is committed to working collaboratively with all stakeholders to ensure the plastics industry is a cooperative and contributing partner in achieving this objective.

CPIA's Efforts to Improve Plastics Recycling, Sustainability and Diversion

The plastics industry believes in the value of reducing and reusing plastic products where possible. When these options have been exhausted it becomes imperative that comprehensive and efficient recycling and energy recovery options are made available to ensure greater sustainability and waste diversion from landfill.

In 2013, it is estimated that 311,000 tonnes of plastics packaging were collected for recycling in Canada. This includes commonly used products such as bottles, foam, film, and non-bottle rigid plastic containers. The amount of plastics collected in 2013 is a nine percent increase from plastics collected in 2012. CPIA is dedicated to ensuring plastic recycling rates continue to increase year after year.

There are a number of ways to assist in diverting plastics from landfill and much of CPIA's efforts in this respect are the result of our Post Use Resource Recovery program, which has three main objectives:

1. Work collaboratively with stakeholders to improve the sustainability of plastics;

2. Increase the types and volumes of plastics diverted from landfill, through recycling and energy recovery efforts; and,
3. Increase the plastics recycling capacity within Canada.

In order to achieve these objectives, CPIA has voluntarily implemented a number of initiatives and pilot projects, as well as engaged with various stakeholders and partners on programs in Canada and the US that are focused on sustainability and environmental outcomes. While many of CPIA's current pilot projects (further details are provided in Appendix 1) are focused on flexible packaging, CPIA has spent decades working with industry and government stakeholders to increase the overall infrastructure for all types of plastic packaging, including bottles and other rigid containers. These efforts have included support to curbside and depot infrastructure, research and supporting the development of Canadian markets for the different types of plastics.

HOW TO INCREASE PLASTICS RECYCLING AND DIVERSION RATES IN ONTARIO

In order to support the MOECC's vision of shifting to a circular economy, a collaborative effort is needed between the plastics industry, brand owners, municipalities and the Government of Ontario. The remaining portion of our comments outline a number of recommendations that CPIA believes will assist in achieving our shared goals of increasing recycling and diversion rates in Ontario.

1. Adopt a hierarchy of resource recovery options that includes energy recovery

CPIA applauds MOECC in setting the aspirational goals of achieving zero waste and a circular economy; however, we also urge you to consider all options, including energy recovery, for diverting waste from landfill. As many other jurisdictions worldwide have recognized, there are a wide range of available options to recover resources at the end of the useful life of products or packaging, and the MOECC should look beyond just recycling to achieve the full potential of the *Resource Recovery and Circular Economy Act*.

While recycling is widely recognized as the highest value for using post-use materials, it is important to note that not all materials can be recycled in commercial markets at the present time. In addition, a circular economy is more than just mechanical recycling – it also includes options such as chemical recycling and energy/fuel/electricity conversions from energy recovery technologies.

Fortunately, there is a growing range of energy recovery technologies designed to divert non-recycled materials, including plastics, from landfill and convert them into useful energy, fuels and chemical feedstocks. These technologies include waste-to-energy, engineered solid fuels, gasification and pyrolysis. Converting non-recycled plastics into liquid fuels and chemical feedstocks offers significant potential environmental and economic benefits compared to landfilling.

Another matter to consider is that in many cases, the energy and water required to collect, transport, clean and recycle contaminated packaging and/or non-recyclable materials is much higher and results in higher generation of greenhouse gas emissions than energy recovery options for the same materials. MOECC needs to be sure that any decisions regarding future legislation around packaging materials is based on the total life cycle analysis and not only the

recyclability and recovery rates. In keeping with Ontario's climate change strategy, it will be important to ensure that the province's recovery and recycling efforts do not lead to an increase in energy use or greenhouse gas emissions.

Overall, CPIA believes Ontario has an opportunity to strengthen its proposed solid waste regulatory framework by promoting a preferential hierarchy of resource recovery options with source *reduction* and *reuse* before *recycling*, followed by *recovery* for non-recyclable materials. The inclusion of energy recovery, or "the 4th R", is an opportunity for advancing diversion, minimizing the amount of residue and plastic resources sent to landfill, and increasing the value of the materials that can't be recycled through traditional recycling technologies.

A current Canadian example of an ideal circular economy model is the integrated waste management centre in Edmonton, Alberta, which has a fully integrated system of recycling, composting and a new gasification system that converts its non-recycled materials to liquid fuels and chemicals. Edmonton's system is expected to eventually divert 90 percent of its post-use materials from landfill. CPIA recommends the MOECC consider the integrated waste management model used in Edmonton, Alberta when looking for tangible ways to meet your zero waste goals.

In Canada, approximately 13 percent of plastics packaging waste is considered unsuitable for recycling because of the lack of mechanical technology and/or contamination. While innovation and advancements in technology should be considered to rectify this problem, until this is a reality, an alternative needs to be established to assist with the nearly 70 percent of municipal solid waste in Canada still being disposed in landfill. Additionally, plastics are a high-value energy source, and have an energy value (45 MJ/kg) that is closer to oil (48 MJ/kg) than coal (26 MJ/kg).

A common misconception surrounding energy recovery is that it detracts from recycling; on the contrary, energy recovery complements recycling efforts. There is data to demonstrate that jurisdictions that employ energy recovery also have higher recycling rates than those without energy recovery. This is true for European jurisdictions including Belgium, Germany, Austria and Sweden who have plastics packaging recycling rates of 38 percent, 40 percent, 35 percent and 38 percent, respectively. This is compared to Canada's national average of 22 percent. In total, these European countries achieved an overall diversion rate of more than 90 percent, which was made possible through waste management options that included the 4th R – energy recovery.

In terms of public acceptance of energy recovery, in a poll commissioned by CPIA through Nielsen in May 2014 to study Canadian attitudes on energy from waste (EFW), the findings clearly showed that two thirds (66%) of Canadians hold a favourable opinion of EFW technologies. In terms of climate change benefits, EFW was seen in a favourable light by 69 percent of Canadians, while natural gas trailed at 59 percent, oil at 37 percent, nuclear at 34 percent, and coal at just 19 percent. Only solar (90%) and wind (75%) ranked higher. And when it comes to non-recyclable plastics, an overwhelming 90 percent of Ontarians stated a preference that non-recyclable plastics go to an EFW facility rather than landfill.

CPIA believes plastics should be recycled to the highest extent possible and we have made recommendations in this submission to further recycling efforts to higher levels. However, there appear to be limits to the efficient mechanical recycling of plastics. At the end-of-life, plastics that are not recycled can and should be repurposed and used as an alternative energy source and diversion tactic.

For these reasons, CPIA believes that Bill 151 and the draft Strategy should include and recognize energy recovery as a method for greater diversion from landfill.

CPIA Recommendations:

- Bill 151 should include a hierarchy of waste management options, including energy recovery, to incentivize resource recovery and increase the volume of residual plastics diverted from landfill.
- The draft Strategy should be revised to acknowledge energy recovery as counting toward the province's overall waste diversion rate.
- MOECC should consider the integrated waste management models used in Edmonton, Alberta and European countries which include complementary activities of recycling and energy recovery when looking for tangible ways to meet the province's zero waste goal.
- MOECC should broaden the definition of renewable energy to include municipal solid waste in order to support the development of recovery options.

2. Clearly defined "producer"

CPIA supports the principles of Extended Producer Responsibility (EPR); however, it is important that Bill 151 be clear and have no ambiguity as to the definition of "producer" or "brand holder". Bill 151 currently includes language that states other stakeholders, such as "those supplying convenience and transport packaging" will have the same regulated responsibilities as brand holders. CPIA and our members are concerned about this inclusion for a number of reasons.

First, the ultimate choice in packaging (whether it be convenience or around the primary product) lays with the brand holders, and the material producers and/or packaging converters are typically instructed by the brand holders as to the packaging requirements. In fact, in many cases, the packaging manufacturers are not even located in Ontario, or Canada, which will make it very difficult to engage these companies in an EPR model, and may result in reducing the competitiveness of Canadian companies. CPIA recommends that Bill 151 state specifically that the manufacturer of packaging is not the "producer" or regulated entity for the purpose of the legislation, and that the regulated responsibility lays with the brand holder. This will provide a clearer understanding of who is responsible for plastics waste under the new regime.

Second, the vast majority of transport packaging does not enter the residential waste stream, and therefore will not cause a financial or physical burden to the taxpayer. In fact, CPIA does not believe that transport packaging should be included in Bill 151 since this material is already managed through "user pay" models in the industrial, commercial and institutional sector (described further below).

CPIA Recommendations:

- Bill 151 should specifically state that the manufacturer of packaging is not the 'producer' or regulated entity for the purposes of the legislation.
- Transport packaging should be removed from Bill 151 as it is managed outside of the residential waste/recycling system and does not cause a financial or physical burden to the municipal system.

3. Harmonization of accepted materials and new material designations

One key impediment to higher recycling rates in Ontario is the lack of cohesion among municipalities regarding accepted materials in the Blue Box program. The plastics industry with its producer, municipal and industry partners have made great progress in growing plastics recycling access rates and infrastructure. New technologies to sort plastics have created demand for recycled plastic feedstocks that continue to grow. However, not all recycling programs are collecting the same categories of plastic packaging.

Augmenting the flow of recycled plastics will attract investment from manufacturers who can incorporate recycled plastics into their manufacturing processes. The absence of a "harmonized" province-wide collection system for all recyclable plastics packaging impedes the development of a robust plastics recycling industry in Ontario.

CPIA believes all plastic bottles, rigid containers, polystyrene foam packaging, and polyethylene film (bags and overwrap) should be designated for a harmonized province-wide collection system for recycling.

Furthermore, in support of designating new materials into regulated programs, CPIA recommends the MOECC include in Bill 151 a requirement for Research and Development to address technical, design and market capacity barriers so that materials that are not currently recyclable, reusable or recoverable can be included in the collection system over time.

CPIA Recommendations:

- As the existing Blue Box program is transitioned under Bill 151, the following consumer plastic packaging categories should be designated for a harmonized province-wide collection system for recycling:
    1. All plastic bottles and other rigid containers, with all plastic caps and lids
    2. Polystyrene foam food and foodservice packaging (XPS) and cushion packaging (EPS)
    3. Polyethylene plastic film – bags and overwrap
- To support the addition of new and emerging materials into regulated programs, Bill 151 should include a requirement for research and development to address technical, design and market capacity barriers so that materials that are not currently recycled, reused or recovered in Ontario can be included in the collection system over time.

4. Industrial, commercial and institutional diversion programs

Because the industrial, commercial and institutional (ICI) sector generates two-thirds of the waste in the province, significant diversion gains for the whole province can only happen through the expansion of this sector's efforts to collect and recycle materials. Fortunately, a number of tools already exist to help expedite the efforts.

First, this sector is already predominantly a 'user pay' system for the collection of waste and recyclables that require the cost of diversion be paid by the generator (versus from the consumer). This system is in keeping with the focus of stewardship programs and therefore no changes are required on this aspect.

Second, the province already has a regulation – Reg. 103/94 – under the Environmental Protection Act (EPA) that applies to the ICI sector and requires major establishments to collect certain material streams for recycling. However, since the regulation was put in place in 1994, it is now outdated and requires updating, specifically in relation to plastic packaging. The regulation designates very little plastics packaging for collection; for instance, it requires only PET food and beverage bottles be collected for recycling in hotels and restaurants; and, only manufacturing establishments need to recycle a broader stream of plastic packaging. The absence of required plastic packaging recycling in the ICI sector is a significant issue for both the industry and a missed opportunity to help develop a greater volume of plastics for sustainable recycling and landfill diversion in Ontario.

CPIA recommends that Bill 151 and the draft Strategy incorporate a requirement that all major ICI sectors listed in Regulation 103/94 be required to collect for recycling multiple streams of plastics, including:

- Plastic bottles, jugs, pails, crates, totes and drums;
- Polystyrene foam food and foodservice packaging (XPS) and cushion packaging (EPS); and,
- Polyethylene plastic films – bags, overwrap, pallet wrap and other films.

CPIA Recommendations:

- The ICI sector should be included under Bill 151; however, the model doesn't need to be the same as the residential sector.
- Bill 151 should include the following harmonized expanded list of materials required for collection and recycling from the ICI sector:
    1. All plastic bottles, jugs, pails, crates and totes, and all plastic caps and lids
    2. Polystyrene foam food and foodservice packaging (XPS) and cushion packaging (EPS)
    3. Polyethylene (PE) plastic films – bags, overwrap, pallet wrap and other PE films

5. Provincial interest and policy statements

Bill 151 describes the provincial interest as it pertains to Ontario's resource recovery and waste reduction system. The provincial interest addresses issues such as reducing greenhouse gas emissions, increasing product durability and reusability, decreasing hazardous substances in products and packaging, developing end markets, and promoting competition in the provision of resource recovery services, among other items. Furthermore, the legislation gives the Minister, by way of Cabinet approval, the ability to issue policy statements for the purposes of furthering the provincial interest.

CPIA understands it is the government's intention that the provincial interest be viewed as a set of guiding principles to help direct resource recovery and waste reduction activities in the province. However, we remain uncertain regarding the implementation of these tools and the necessity of including them in legislation. The legality and enforceability of policy statements and how adherence to the provincial interest will be measured remains unclear. CPIA is concerned that the provincial interest is subjective and could open up a number of precedent-setting variables that will be difficult to apply equally across the diverse waste management sector.

CPIA believes that the development of policy statements as described in the legislation provides the Minister with too much discretion, and ultimately limits the government's transparency and accountability. In developing policy statements, a consultation process with affected stakeholders is not mandatory but instead may be conducted in a manner the Minister considers appropriate. There is no indication of whether potential consultations will be public or private, any anticipated timelines, or mechanisms for providing feedback. Furthermore, the Minister may amend a policy statement at any time and for any reason as per Section 11(3). This amount of flexibility entrenched in the legislation is not ideal as it may be used by the government of the day to implement new requirements that may be disruptive and contradictory to existing best practices.

CPIA believes that if the government would like to provide input or direction on issues relating to the stated provincial interest, then such an issue should be regulated rather than left up to ambiguous and unenforceable policy statements. However, the government should also be mindful of provincial interest issues already governed by other federal and/or provincial laws in an effort to reduce regulatory burden. CPIA would recommend concerns stemming from the provincial interest, which are not already being addressed by other statutes, be included in regulation to implement a higher degree of transparency and accountability.

CPIA Recommendation:

- Matters stemming from the provincial interests (which are not already addressed by other statutes) should be included in regulation to implement a higher degree of transparency and accountability.

6. Landfill bans for designated materials

CPIA supports landfill bans of designated materials in the municipal and ICI waste streams where markets and infrastructure exist for the collection of these materials. In addition to keeping materials out of landfill, bans that are properly planned and executed can help to increase the volumes of materials being collected for recycling, which in turn helps enable a vibrant recovery infrastructure within the province.

CPIA Recommendation:

- Bill 151 should include landfill bans for designated materials in the municipal and ICI sectors where markets and infrastructure exist for the collection of these materials.

7. Stimulating local end-markets

CPIA applauds the MOECC for including end-markets as a priority in Bill 151 and the draft Strategy. While CPIA and our members would be happy to provide additional input to MOECC staff as you work through strategies in this specific area, we have also provided a few high-level comments here.

When considering the potential role for MOECC to stimulate end-markets, we encourage you to ensure the system you support is competitive. We also believe strongly that MOECC and those involved in tracking diversion results need to look at the actual recovery rate for the materials

being collected from Ontario programs. Baling materials and shipping to overseas end-markets should not be considered on the same level as local recyclers who deal with the materials in North America.

CPIA Recommendation:

- MOECC should take an active role in stimulating end-markets for all materials, but especially for new/emerging materials that are regulated under Bill 151.

8. Design, best use and full life cycle assessment of materials

CPIA is concerned that Bill 151 includes elements that start to prescribe how collected materials be reused and specifically states "reused for the purpose that is the same or similar to its original purpose" as per Section 68(2a). CPIA is concerned about this potential restriction because many plastic packaging materials that are highly recyclable may not be eligible for reuse in the same applications due to health and safety requirements. Additionally, such a requirement could lead to a potential increase in greenhouse gas emissions as more energy and water may be required to clean and prepare the end-of-life packaging so that it is suitable for such applications.

Another area of concern for CPIA is the future metrics that will be used to determine the success of regulated waste management programs in Ontario. We encourage the MOECC to consider metrics beyond the traditional "tonnage diverted" as it does not always translate into superior environmental performance. Rather, we encourage the MOECC to consider a "sustainable materials management" approach, such as that being explored by the State of Oregon (http://www.oregon.gov/deq/LQ/Pages/SW/MaterialsManagement.aspx), which is a holistic view of environmental impacts across the full life cycle of materials and includes resource extraction and use of recovered materials, the design and production of materials, their use, and end-of-life management, including solid waste disposal and recovery.

CPIA Recommendations:

- Bill 151 should not include prescriptive language or requirements that recovered materials be reused for the same or similar purpose as its original purpose.
- When it comes to measuring overall performance, Bill 151 and future regulations should include a holistic view to materials management that includes a full life cycle assessment of materials, rather than relying solely on the restricted measurement tool of tonnage diverted.

SUMMARY OF RECOMMENDATIONS

The following list is a summary of the recommendations that CPIA provided throughout our comments above:

- Bill 151 should include a hierarchy of waste management options, including energy recovery, to incentivize resource recovery and increase the volume of residual plastics diverted from landfill.
- The draft Strategy should be revised to acknowledge energy recovery as counting toward the province's overall waste diversion rate.
- MOECC should consider the integrated waste management models used in Edmonton, Alberta and European countries which include complementary activities of recycling and energy recovery when looking for tangible ways to meet the province's zero waste goal.
- MOECC should broaden the definition of renewable energy to include municipal solid waste in order to support the development of recovery options.
- Bill 151 should specifically state that the manufacturer of packaging is not the 'producer' or regulated entity for the purposes of the legislation.
- Transport packaging should be removed from Bill 151 as it is managed outside of the residential waste/recycling system and does not cause a financial or physical burden to the municipal system.
- As the existing Blue Box program is transitioned under Bill 151, the following consumer plastic packaging categories should be designated for a harmonized province-wide collection system for recycling:
    1. All plastic bottles and other rigid containers, with all plastic caps and lids
    2. Polystyrene foam food and foodservice packaging (XPS) and cushion packaging (EPS)
    3. Polyethylene plastic film – bags and overwrap
- To support the addition of new and emerging materials into regulated programs, Bill 151 should include a requirement for research and development to address technical, design and market capacity barriers so that materials that are not currently recycled, reused or recovered in Ontario can be included in the collection system over time.
- The ICI sector should be included under Bill 151; however, the model doesn't need to be the same as the residential sector.
- Bill 151 should include the following harmonized expanded list of materials required for collection and recycling from the ICI sector:
    1. All plastic bottles, jugs, pails, crates and totes, and all plastic caps and lids
    2. Polystyrene foam food and foodservice packaging (XPS) and cushion packaging (EPS)
    3. Polyethylene (PE) plastic films – bags, overwrap, pallet wrap and other PE films
- Matters stemming from the provincial interests (which are not already addressed by other statutes) should be included in regulation to implement a higher degree of transparency and accountability.
- Bill 151 should include landfill bans for designated materials in the municipal and ICI sectors where markets and infrastructure exist for the collection of these materials.
- MOECC should take an active role in stimulating end-markets for all materials, but especially for new/emerging materials that are regulated under Bill 151.
- Bill 151 should not include prescriptive language or requirements that recovered materials be reused for the same or similar purpose as its original purpose.
- When it comes to measuring overall performance, Bill 151 and future regulations should include a holistic view to materials management that includes a full life cycle assessment

of materials, rather than relying solely on the restricted measurement tool of tonnage diverted.

We offer these comments and recommendations to support Ontario's efforts to increase resource productivity and reduce waste, enable an efficient and effective recycling system, and create conditions to support sustainable end-markets. CPIA welcomes further discussion on the above comments.

Sincerely,

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Appendix 1: A Sample of CPIA Projects to Increase the Amount of Plastics Packaging being Diverted from Landfill

Pilot Project for ICI Collection and Recycling of Film Plastics – Launched in April 2014, CPIA created a program aimed at collecting and recycling stretch wrap and flexible polyethylene film from loading docks and back-of-store operations within the retail sector. The program included an educational component for retail tenants on the importance of plastics recycling and how they can participate. CPIA worked with a mall management firm to document the types and quantities of film generated, and to incorporate the recycling of that material into the existing waste management contract. Since completing the pilot, a tip sheet has been created and promoted to stakeholders within the retail and property management sectors, and CPIA has started a new initiative to engage grocery retailers in a 2016 pilot to understand management options for both flexible and rigid plastics.

Expanding Film Plastics Recycling to Retail – In July 2014, CPIA entered into a partnership with Walmart and SC Johnson to implement a national return-to-retail model for collecting a wide range of post-consumer film and bag materials. Consumers are encouraged to bring their used plastic grocery, bread, dry cleaning, and newspaper bags (among others) back to retail locations. The project partners are currently finalizing collection and recycling infrastructure, and expect to undertake a national launch to announce the program in the coming months.

Polystyrene Collection and Recycling – In October 2013, CPIA initiated a pilot project with the City of Montreal to collect and recycle polystyrene (PS) through the municipal ecocentre infrastructure. The pilot focused on establishing the collection network, finding a sustainable end-market for the material collected, and educating the residents of Montreal about the value of recycling PS. Through the pilot, CPIA identified a Quebec-based member company who is able to transport the PS as part of their backhaul infrastructure and use the recovered materials in the production of durable construction products made at their manufacturing facility. In October 2014, Montreal announced their commitment to extend the pilot to an ongoing basis. CPIA continues to engage other municipalities to establish similar programs for PS using the education and infrastructure developed during the Montreal pilot.

Online Directory for Film and Foam Drop-Off Locations – In 2015, CPIA built on the success of an online tool created by the American Chemistry Council and populated the directory (www.plasticfilmrecycling.org) with Canadian content. We also worked with a range of industry stakeholders to develop a new North America-wide directory for foam recycling (www.recyclemoreplastic.org). The online tools are intended to be used by Canadians nation-wide to identify retail, municipal, and private depot locations that collect and recycle film/bags and foam. The tools are being promoted through private and municipal outreach channels to raise awareness of collection networks and the positive value of recycling plastic film and foam.