Canada’s mandatory Federal Plastics Registry reporting: What you need to know

April 22, 2025

On April 20, 2024, the Government of Canada issued a Notice pursuant to section 46 of the *Canadian Environmental Protection Act, 1999* (CEPA) mandating that certain entities report information on the quantities and types of plastics that they manufacture, import, produce and place on the Canadian market.

Reporting requirements are being rolled out in three phases with the first reporting due by Sept. 29, 2025. Those caught by the reporting requirements have **only five months** to comply by gathering and reporting the requested information, or risk non-compliance and sanction.

Key takeaways

- Producers of more than 1,000kg of plastic packaging, plastics in electronic and electrical equipment or plastics in single use disposable products are required to report to the Federal Plastics Registry by Sept. 29, 2025.
- Additional phases of reporting are required in 2026 and 2027.
- There is no mechanism for extending reporting deadlines.

Required reporters under phase 1 of the *Notice with respect to reporting of plastic resins and certain plastic products for the Federal Plastic Registry for 2024, 2025 and 2026* (the Notice) can now begin their 2024 reporting ahead of the Sept. 29, 2025, deadline. The new federal reporting platform for plastics is live and can be accessed here.

BLG is available to assist in determining whether your organization is obligated to report under the Notice, and, if it is, to assist throughout the reporting process.

Who is required to report?

Phase 1 applies to producers of:

- plastic packaging;
- electronic and electrical equipment; and

- single-use or disposable products.

“Producers” is very broadly defined and may include brand owners, intellectual property holders, importers, manufacturers, suppliers, and retailers (including marketplace facilitators and marketplace sellers). If you are caught under provincial or territorial environmental stewardship requirements it is likely you will be caught under the Notice as well.

Phase 1 targets products entering the residential waste stream and therefore, for the moment, producers of products that enter the commercial, institutional or industrial waste stream are not required to report.

Phase 2, with reporting in 2026 for data collected in 2025, significantly broadens both the applicability and scope of reporting requirements. Phase 2 will include reporting for plastics in agriculture, tires, transportation, construction, fishing and aquaculture, and textiles and apparel, and for plastic resins.

Marketplace sellers and facilitators may be responsible for reporting under the Plastics Notice. A marketplace seller is “a person that offers products for sale through a marketplace facilitator”. Marketplace sellers are usually independent retailers or producers who utilize online marketplaces or platforms. Marketplace sellers are responsible for the creation and supply of products. On the other hand, a marketplace facilitator helps distribute a product and owns or manages the online marketplace. The marketplace facilitator helps physically distribute a product, which includes storage, preparation, and shipping.

Phases and timelines

Reporting requirements are phased and will be progressively broadened.

- **Phase 1**: For the calendar year of 2024, reporting is required on plastic placed on the market in three categories. This reporting is due by Sept. 29, 2025.
- **Phase 2**: For the calendar year of 2025, phase 2 adds reporting requirements for resin manufacturers and importers, for the three categories that reported during phase 1, as well as reporting on plastic placed on the market for remaining categories. Phase 2 will also see the introduction of reporting on plastic waste generated at industrial, commercial, and institutional facilities and the introduction of reporting for plastic collected and sent for diversion and disposal for some categories. Phase 2 reporting is due by September 29, 2026.
- **Phase 3**: For the calendar year of 2026, phase 3 adds additional reporting on plastics collected and sent for diversion and disposal for more categories. Phase 3 reporting is due by Sept. 29, 2027.
- **Phase 4**: Reporting requirements for phase 4 will be covered in a future information gathering notice.

De minimis exception

Phase 1 does not apply to persons who manufacture, import or place on the market less than 1,000 kg of plastic products or packaging per calendar year. This must be calculated on a national basis.

What information must be reported in phase 1?

Persons must report the required information using the online reporting system. This includes the total quantity, in kilograms, of all plastic packaging that is: (a) manufactured in Canada, (b) imported into Canada, and (c) placed on the market in Canada in each province and territory. Several characteristics of the plastic must be reported, including the type of plastic, quantities, and its categorization.

Responding to the Notice requires providing information that the organization possesses or to which it may be reasonably expected to have access. This may require making inquiries to suppliers.

How BLG can help

If you have any questions about the Plastics Notice or the regulation of plastics generally, please reach out to any of the authors or key contacts listed below.

We can assist in determining whether the reporting requirements (phases 1, 2 or 3) apply to your operations and reporting, if needed. We can also assist companies up the supply chain who are fielding inquiries by those potentially caught by the reporting requirements.

By

Edona C. Vila, Claire R. Durocher, Benjamin Fuhrmann, Jonah Kahansky, Allison Lalla, Rick Williams

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blg.com

BLG Offices

Calgary
Centennial Place, East Tower
520 3rd Avenue S.W.
Calgary, AB, Canada
T2P 0R3

T 403.232.9500
F 403.266.1395

Ottawa
World Exchange Plaza
100 Queen Street
Ottawa, ON, Canada
K1P 1J9

T 613.237.5160
F 613.230.8842

Vancouver
1200 Waterfront Centre
200 Burrard Street
Vancouver, BC, Canada
V7X 1T2

T 604.687.5744
F 604.687.1415

Montréal

1000 De La Gauchetière Street West
Suite 900
Montréal, QC, Canada
H3B 5H4

T 514.954.2555
F 514.879.9015

Toronto

Bay Adelaide Centre, East Tower
22 Adelaide Street West
Toronto, ON, Canada
M5H 4E3

T 416.367.6000
F 416.367.6749

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