



Preparing for the Federal Plastics Registry

Guiding organizations through Canada's evolving compliance landscape



The regulatory landscape for plastics is evolving rapidly, leading to increased legal and operational risks for organizations that produce and manage plastic products and plastics waste. Is your company ready to report?

Only 9% of plastic waste is recycled in Canada while the remainder is sent to landfills, waste-to-energy facilities or the environment.¹ The Government of Canada is taking action to reduce plastics pollution as part of its **goal of zero plastic waste by 2030**.

Canada is now developing a **Federal Plastics Registry** to collect critical data, enhance transparency, align with provincial extended producer responsibility (EPR) regulations, and enable a circular economy. **The registry introduces an annual reporting requirement** for impacted companies.

In April 2024, ECCC published a Notice for the Federal Plastics Registry requiring companies to provide standardized **quantification data about certain plastic products and resins placed on the Canadian market from 2024 through 2026**.²

Reporting requirements will be introduced and expanded through phases, **beginning September 29, 2025**.

The ECCC published a **guidance document** in early 2025.³

Considerations for your leadership team:

- Are you prepared to report detailed information on plastic quantities, usage, design types, sources, and end-of-life management?
- How do you currently manage plastic waste generated at your facilities?
- Do you have a process in place to verify the data submitted to the registry?
- Do you foresee any changes in your supply chain or procurement practices to meet new demands for transparency and compliance?
- Have you confirmed with your suppliers if they are in scope, and how they might indirectly impact your business?

Organizations involved in the following activities may be required to report:

- Manufacture, import, and placement of plastic packaging and products on the Canadian market.
- Manufacture, import, and placement of plastic resins on the Canadian market.
- Generation, collection, diversion and/or disposal of plastic products in Canada.

Categories of products impacted by reporting requirements:

- Plastic Resins
- Packaging
- Electronic and Electrical Equipment (EEE)
- Single-use or disposable plastic products
- Agriculture and Horticulture
- Tires
- Transportation
- Construction
- Fishing and aquaculture
- Textiles and Apparel

Sources:

1. "The last straw: Turning the tide on plastic pollution in Canada." Government of Canada (June 2019)
2. "Canada Gazette, Part I, Volume 158, Number 16: GOVERNMENT NOTICES" Government of Canada (April 2024)
3. "Guide for reporting to the Federal Plastics Registry – phase 1." Government of Canada (2025)



Read our FAQ

Potential impacts to your organization

01 You may need to report

Any organization who:

- Manufactures, imports, or places on the market more than 1,000 kg of plastic products or packaging per calendar year;
- Generates more than 1,000 kg of packaging and plastic product waste at their industrial, commercial, and industrial facilities per calendar year; or
- Manage more than 1,000 kg of plastic via the plastics management service per calendar year.

02 The deadlines to report are fast approaching

- **Reporting will be phased in** by category of plastics products, starting in September 2025.
- Entities must submit their 2024 data quantities of plastics in **packaging and electronics and single use or disposal plastic products** by **September 29, 2025**.
- **Subsequent annual reporting deadlines will follow**, with phased implementation for different categories of plastic products from **2025 to 2028**.

03 Failure to report may result in penalties

- Fines of up to **\$500k** for the first offence of a large corporation, **and \$1 million** for subsequent offenses.
- If a corporation commits an offence, directors and officers may also be **personally liable**, whether or not the corporation is prosecuted or convicted.

How KPMG can help

For over 20 years, our Canadian professionals have designed, implemented, and managed environmental regulatory and compliance programs in response to evolving regulatory requirements. Our cross-functional teams of lawyers, customs and trade, engineering, risk, and sustainability professionals combine deep technical subject matter expertise and sector-specific insights to help you assess, report, monitor and improve your plastics management.



Understand and assess

- **Identify** products and business operations that involve plastics
- **Gather** required data on plastics quantities, usage and other technical details
- **Review** existing policies and procedures to manage, mitigate, or minimize plastics pollution
- **Evaluate** gathered data against reporting thresholds
- **Assess gaps** between your current data and reporting requirements



Quantify and report

- **Map the internal and external stakeholders** to be consulted along the value chain and drive the data and information collection
- **Quantify reportable quantities and document the methodologies applied** (including assumptions and estimates)
- **Prepare** report according to the ECCC Notice and pending guidance.
- **Draft** requests for confidentiality, exemptions, and extensions, as needed
- **Submit** report for 2024 calendar year information by September 29, 2025



Monitor and improve

- **Develop measures to control and monitor** the quality of data, calculations and information to be updated.
- **Develop** policies and procedures to manage, mitigate, and reduce inappropriate disposal of plastics products and encourage circularity
- **Ensure training and support strategic development** to align with Canada's and international plastics commitments
- **Provide** training and design processes to comply with future regulatory developments



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