



Alberta Grains

September 12, 2025
Alberta Agriculture & Irrigation
J.G. O'Donoghue Building
Edmonton, AB
T6G 0A5
Via Email: Agi.agplasticsengagement@gov.ab.ca

Re: Alberta Grains' Submission on Agricultural Plastics Management in Alberta

Alberta Grains is a farmer-funded and directed organization representing the interests of over 14,000 wheat and barley producers across Alberta. Under our mandate through the *Alberta Marketing of Agricultural Products Act*, we invest in the long-term economic sustainability of Alberta's cereal sector through research, agronomy, grower extension, market development, and government policy advocacy.

We appreciate the opportunity to participate in the [agricultural plastics management engagement](#) and commend Alberta Agriculture & Irrigation for studying the viability and logistics of a recycling program for the agricultural sector.

Our enclosed submission reflects our long-standing support for an agricultural recycling program that supports farmers and expands to include more products (such as those listed in the engagement). Although plastics are helpful tools for efficient farm operation, farmers face hurdles in managing these products after use.

While some farmers value incentive-based or market-driven approaches, Alberta Grains has generally been supportive of a regulated extended producer responsibility (EPR) framework to ensure consistency, permanency, and fairness across the province. Our support has been based on addressing concerns related to: standards of cleanliness on grain bags and twine being recycled, ensuring an adequate number of collection sites, need for transparency on increased feeds for grain bags and twine with the implementation of any EPR legislation and a user pay system, and lastly a desire to see the plan for expansion to other on-farm plastic products.

Thank you for your consideration of our recommendations. Please direct any follow-up questions to Shannon Sereda, Director of Government Relations, Policy and Markets, Alberta Grains, at ssereda@albertagrains.com or 587-899-5299.

Sincerely,

Director, Government Relations, Policy & Markets
Alberta Grains

- 1. Alberta should move to a regulatory approach for managing agricultural plastics waste where agricultural plastics producers are required, at minimum to fund a system to collect and recycle end-of-life agricultural plastics waste for the designated products they supply into Alberta. Agricultural plastics producers can pass through the costs to consumers.***

Alberta Grains has previously supported moving toward a regulatory approach for managing agricultural plastics waste. Farmers, as stewards of the land, have actively participated in the 'Alberta Ag-Plastic. *Recycle It!*' program, recycling over 4,100 tonnes of grain bags and twine over the past five years. Establishing a permanent program will provide a practical alternative to burning or long-term storage of agricultural plastics on-farm. We would hope that the program as proposed will address a critical gap and help Alberta wheat and barley farmers continue to show leadership in environmental sustainability.

There is acknowledgement that recycling under an extended producer responsibility (EPR) program may involve a user pay system. However, some farmers are concerned about the potential financial burden if fees accumulate across multiple products and are combined with travel costs to and from collection sites. For example, in Saskatchewan, grain bag prices reportedly rose by five to seven per cent under a user-pay model. Such increases could cost Alberta producers thousands of dollars over several years. Farmers already operate in an uncertain and low-margin business environment, and extra costs can directly harm profitability.

We acknowledge that fees can help cover the overhead of recycling and support a reliable option, but they must remain nominal and transparent at the point of purchase. Furthermore, contributions must be fairly shared among farmers, retailers, and manufacturers to avoid undue subsidization of EPR program costs by farmers.

- 2. Besides funding the system, Alberta should also require agricultural plastics producers to be responsible for collecting and recycling end-of-life agricultural plastics waste for the designated products they supply into Alberta.***

Alberta Grains agrees that plastic producers should be responsible for collecting and recycling end-of-life of their products. It would place responsibility on sellers of designated materials to ensure recycling outcomes are achieved. We believe this program can incite new practices and technological advancements that will reduce waste and keep costs down. Furthermore, it will shift the cost of recycling programs from the municipalities and taxpayers to those who supply these programs. This requirement will also harmonize legislation among neighbouring jurisdictions, such as Saskatchewan and Manitoba.

Implementation Timing & Recovery Rates

- 5. Please indicate your support for the phased implementation timing outlined in the table above.**

Alberta Grains generally supports the phased expansion proposed and the associated schedule. There are no concerns in meeting the January 1st, 2028, beginning date as farmers are already actively recycling plastics such as grains bags and baler twine, as demonstrated by the success of the current recycling pilot. Alberta Grains also appreciates the inclusion of more products such as seed bags and fertilizer containers.

9. Please indicate your support for the recovery rate targets phased over time as outlined in the table above.

It is our understanding that under an EPR program, achieving recovery rate targets will be the responsibility of plastic producers. Farmers are supportive of these aspirational targets as long as responsibility of meeting the recovery rates continues to belong to plastic producers. As the pilot demonstrates, farmers want recycling options as there are currently limited alternatives to disposal; but, in order to ensure success of a recycling program, plastic producers must be responsible for their products. Factors that will lead to achieving the recovery rate targets will depend on education, adequate collection sites and easy to achieve plastic collection standards.

Regarding the 5 per cent increase in recovery rate every 3 years, we support them provided plastic producers are responsible for meeting them and targets reflect technological and logistical realities.

With respect to grain bags, Alberta Grains has noted concerns expressed by farmers that standards of cleanliness can be a barrier to recycling acceptance and should be addressed and acknowledged in reaching the potential recovery rate targets for grain bags.

Service Standards for Agricultural Plastics Waste Collection

13. Collection sites should be available within 80 km of 80% of all farms or ranches in the province.

At a minimum, collection site should be available within 80 km of farms or ranches. Many farmers highlighted that distance to a collection is an impediment to being able to recycle. For some regions in the province, distance from a collection site will not be an issue. However, for some sparsely populated regions like the Peace, this may be more of a concern. A survey from CleanFarms in 2023 found confirming evidence that the vast majority of farmers believe it is important to be able to recycle the products they use on-farm. In order to enhance the program's success, it will require a concerted effort to ensure that collection sites are strategically placed.

Many recognize that transportation costs will be a significant factor to a user-pay system and that economies of scale will help keep costs down. Taking this factor in consideration, it requires that there is a balance between the number of collection sites and how that will impact costs for farmers.

14. If a farm or ranch were outside the proposed 80 km collection site radius, would an annual collection event provide reasonable access to recycling agricultural plastics?

An annual collection event will be necessary to support the success of the program and potentially lead to lower costs for farmers. However, this comes with a couple of caveats. First, timing of the event will be paramount. If this event occurs during a busy period like harvest or seeding, and just for one day, the efficiency of a collection day will be greatly reduced. If such an event happened over the course of a few days, or multiple times over the course of the year, then there will be a greater likelihood of success. Timing will be a critical factor in planning for collection days.

Second, effective communication with sufficient time to plan is essential to supporting a successful collection day. Farmers note that storing plastics until collection can be difficult, so advance notice of dates will help reduce burdens and allow them to plan accordingly.

It is worth considering the potential of collaboration, or continued collaboration, with local Municipal Districts or Counties. Some would certainly have knowledge of where to best locate collection days that could lead to optimal locations in the community.

Conclusion

19. Do you prefer a specific regulatory approach for the management of agricultural plastics waste?*

Alberta Grains supports a regulated EPR system that induces plastic producers to take greater responsibility for the products they create. As stated earlier, we believe it will lead to greater adoption of recycling practices. Farmers rely on plastics to support their operations, however it places them into difficult positions such as trying to find storage, burying or burning. Recycling resolves an important issue for farmers by providing a practical solution to an important concern.

The main benefit of EPR is that it places the obligation on industry producers to develop, operate and fund these programs rather than on the product user. Alberta Grains believes EPR will lead to optimal outcomes that supports farmers achieve their stewardship goals, and incentivizes innovation and new practices that will ameliorate the sustainability of the sector. Again, to underscore, Alberta Grains' farmers have expressed the need for transparency on increased fees for grain bags and twine (and other plastic products to follow) at the point of purchase for farmers with the implementation of the EPR legislation and in the development of the a user pay system.

Additional Comments

Alberta Grains firmly believes in the benefits of an agricultural plastics program. In order to help ensure the program remains successful, farmers will benefit from education and reduced barriers for collection standards. Currently, there are cleanliness and packing requirements that can be overly burdensome. Considering there could be potential user fees

to recycle in the future, we hope plastic collection standards requirements remain convenient for farmers and will not increase cost for farmers nor demand excessive time. CleanFarms survey data from 2023 found that other significant barriers after “no collection site nearby” was cleanliness requirements and lacking the necessary equipment to properly prepare a product for recycling. Alberta Grains asks that a regulatory system does not create nor add to these outlined barriers and adequately supports farmers.

Alberta Grains stands ready to support program implementation by helping share communications with farmers if the EPR program moves forward.