



Japan Machinery Center
for Trade and Investment

9th February, 2024

Federal Plastics Registry
Plastics Regulatory Affairs Division
Environment and Climate Change Canada
351 Saint-Joseph Boulevard
Gatineau, Quebec K1A 0H3

Dear Sirs,

JMC comments on “ Notice of intent to issue a notice under section 46 of the Act with respect to reporting of certain plastic products for 2024, 2025 and 2026 ”

The Japan Machinery Center for Trade and Investment (“JMC”) is a non-profit organization. It was established in December 1952 in accordance with the Japanese Export and Import Trade Law under the authorization of the Minister of Economy, Trade and Industry of Japan. The objective of the JMC is to engage in activities that enhance the common benefit of member companies and promote the sound development of international trade and investment by the machinery industry. JMC comprises member companies engaged in machinery and systems-related exports and foreign investments such as machinery manufacturers, trading houses and engineering companies. At present, the total number of JMC member companies is about 240.

Our committee handles environmental and product safety issues regarding products for trade and is strongly concerned with overseas environment and product safety-related regulations on products. From this standpoint, we would like to comment on Notice of intent to issue a notice under section 46 of the Act with respect to reporting of certain plastic products for 2024, 2025 and 2026.

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If you have any questions, please feel free to contact our secretariat (Mr. Chiaki Morikawa, E-mail: morikawa@jmcti.or.jp)).

Sincerely yours,

A handwritten signature in black ink, reading "Kanno Yasuhiko". The signature is written in a cursive, flowing style.

KANNO Yasuhiko

Chairman

Environment Law Committee

Comment on Notice of intent to issue a notice under section 46 of the Act with respect to reporting of certain plastic products for 2024, 2025 and 2026

We, the Japan Machinery Center for Trade and Investment, would like to express our gratitude to the Government of Canada for inviting public comment regarding consultation on Notice of intent to issue a notice under section 46 of the Act with respect to reporting of certain plastic products for 2024, 2025 and 2026.

Notice

[Plastic pollution - Canada.ca](https://www23.international.gc.ca/plastic-pollution-pollution-plastique/Plastic-pollution-pollution-plastique.aspx)

We support the initiative of the Government of Canada aimed at the elimination of plastic waste.

We are vigorously committed to voluntarily promoting assessment activities that take into account the entire life cycle in order to protect human health and the environment and to reduce plastic waste worldwide, and to complying with national regulations on plastic waste by a number of countries. In particular, we have been active in complying with those in Europe and North America.

After diligent consideration of the published notice, we are concerned about several provisions that make it difficult for producers to comply with this notice in practical terms, and we would like to submit the following comments.

1. Data provision should not be required for EEE/machinery products and the packaging.

- (1) Currently, there is no country or region that requires provision of data for EEE and machinery products, such as the plastic resin used in EEE/machinery products and the weight of plastic used, as required in the proposed Plastic Registry.
- (2) It is very difficult or impossible to provide detailed information about the resins that make up EEE/machinery products for the following reasons.
 - Each EEE/machinery product is complexly composed of hundreds of parts and thousands of materials. It is practically impossible to investigate, and accurately report detailed information on each material, such as its raw material, weight, and whether it is virgin material.
 - The components or units that make up EEE/machinery products involve multiple suppliers and processes in a complex supply chain, which requires a significant amount of time to trace. Furthermore, material information is often not available owing to supplier trade secrets or contractual reasons.

- Provision of such data retroactively for products which have already been designed is especially challenging.
- (3) At the provincial level, Canada enforces EEE and packaging collection and recycling laws, as well as appropriate collection and recycling through stewardship and blue box programs.
- (4) There are no major issues under the current laws and regulations, and requiring each importer to provide information on each type of plastic and each product with new legislation that goes beyond the current standards would be unduly burdensome.
- (5) We therefore propose that data provision not be required for EEE/machinery products and the packaging, so as to avoid it becoming a trade barrier for placing EEEs on the Canadian market. Instead, we would suggest that the federal government establish a mechanism to obtain the data in coordination with the existing reporting systems of the provincial level regulations.

2. First, the discussion on how to utilize plastic data should be deepened.

Since there is insufficient consideration of how to utilize the data obtained, and the information required will vary depending on how it is utilized, discussions on how to utilize the data should first be deepened, and then the information that is really needed should be collected by means which is not excessively burdensome to manufacturers.

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