EXTENDED PRODUCER RESPONSIBILITY

2025 ANNUAL REPORT

Alberta recycling MANAGEMENT AUTHORITY

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Alberta Recycling Management Authority works with Albertans from all areas of our province, as such, we acknowledge the Indigenous Peoples who have and continue to live among, travel through and care for the land in the area currently known as Alberta. The relationship that Indigenous Peoples of Treaty 4, 6, 7, 8, and 10 have with the land is founded on a deep respect and relationship with the environment. This connection forms the foundation of our responsibility and vision of inspiring a future without waste.

A Message from the **Board Chair and CEO**

The successful launch of Alberta's Extended Producer Responsibility (EPR) system in 2025 marked the beginning of a new chapter for recycling in our province. Following years of planning, collaboration, and engagement, Alberta launched the first stage of its Made-in-Alberta producer-funded recycling system, marking the beginning of a transitional implementation period. Built on accountability, transparency, and shared responsibility, the framework establishes the foundation for a modern recycling system designed to evolve over time. For ARMA, this milestone also represents the next step in more than 34 years of environmental stewardship leadership.

While this report focuses on the implementation of Alberta's EPR system during a transitional year, it also serves as an example of what reporting could look like in the future. Drawing on data reported by Producer Responsibility Organizations (PROs), it is intended to help establish the reporting process, test the collection and presentation of province-wide performance information, and identify opportunities for continued refinement. The report structure presented for this year should be understood as illustrative only and may change from year to year as the reporting process evolves. The system statistics provided for this first operational year largely represent the recycling systems that were already in place pre-EPR. Material management targets do not take effect until 2027, with the first report against those targets to be submitted in 2028. Accordingly, this year's report is strictly intended to serve as an illustrative process of the overall reporting framework as Alberta works toward the launch of material management requirements. This report complements ARMA's Corporate Annual Report, which contains the organization's financial statements, key performance measures, and reporting on its broader stewardship and organizational activities.

The successful implementation of EPR reflects the collaborative efforts of government, municipalities, Indigenous communities, PROs, producers, service providers, and ARMA. Together, these partners have established a Made-in-Alberta system built on accountability, measurable performance, and continued improvement that advances Alberta's vision for a stronger circular economy.

Despite being in its first year, the single-use products, packaging and paper products (PPP) program, contributed more than $160 million in GDP, generated $75 million in wages, contributed $10.1 million in taxes, and sustained 1,230 full-time equivalent jobs in 2025.*

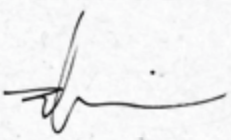
Throughout this transitional implementation year, ARMA's focus shifted from establishing the system to supporting its operation, monitoring performance, strengthening participation, and identifying opportunities for continuous improvement. Recognizing the complexity of implementing a province-wide producer-funded recycling system, ARMA emphasized stakeholder education, engagement, and practical implementation support to help communities, producers, PROs, and service providers successfully navigate the transition. These efforts contributed to the registration of 1,036 producers of single-use products, packaging and paper products (PPP), and 160 producers of hazardous and special products (HSP). System coverage reached 94% of Alberta's population, including 20 First Nations and Métis Settlement communities, while also creating new economic opportunities for communities and the recycling sector.

In the coming year, ARMA will focus on implementing a comprehensive compliance framework centred on education, prevention, and enforcement, while continuing to support communities, producers, PROs, processing facilities, and other service providers as reporting, verification, and performance expectations develop. Preparations are also underway for the October 2026 implementation of Phase II PPP, which will expand and standardize EPR service across the province. These activities represent the next stage in Alberta's phased implementation of EPR as the system transitions from establishment to long-term operational performance. As with any system of this scale, ARMA expects ongoing refinement through collaboration with stakeholders to strengthen operational processes, improve reporting consistency, address free rider concerns, and continue evaluating material lists and program scope to ensure the system remains effective, efficient, and responsive.

As Alberta's EPR system continues to advance, ARMA remains committed to working collaboratively with communities, producers, PROs, service providers, Indigenous partners, and government to strengthen system performance and public confidence. While 2025 was intentionally focused on establishing the foundation for Alberta's EPR system, the work completed during this transitional implementation year has positioned the system for continued growth and long-term success. Together, we will continue strengthening a recycling system that is transparent, accountable, and responsive to the needs of Albertans. Through continued engagement and a shared commitment to innovation, we will continue building a stronger circular economy while *inspiring a future without waste®* for generations to come.

Sincerely,

Brad Pickering, Board Chair



Ed Gugenheimer, CEO

**Industry survey, Statistics Canada, PRO annual reports, ARMA data for FY 2025, and EY analysis.*

ARMA'S
Oversight of EPR

Extended Producer Responsibility (EPR) is a producer-funded approach that shifts responsibility for the collection and management of designated materials from municipalities and taxpayers to the producers that supply those materials into Alberta. By placing responsibility with producers, EPR encourages waste reduction, increased recycling, and innovation while supporting the development of a stronger circular economy.

The Extended Producer Responsibility Regulation, which came into force in 2022, designated Alberta Recycling Management Authority (ARMA) as the oversight authority responsible for administering Alberta's EPR system. The regulation applies to two designated material categories:

- Single-use Products, Packaging, and Paper Products (PPP); and
- Hazardous and Special Products (HSP).

As the oversight authority, ARMA is responsible for administering the regulatory framework that supports Alberta's EPR system. This includes establishing bylaws governing registration, reporting, auditing, compliance, dispute resolution, and exemption thresholds, while registering Producer Responsibility Organizations (PROs), producers, communities, processing facilities, and other service providers. ARMA also provides oversight, monitoring, and coordination to support the effective administration and improvement of the system.

Following the launch of HSP and Phase I PPP on April 1, 2025, ARMA's focus has been on supporting stakeholder education, registration, reporting readiness, engagement, and system coordination while monitoring performance and collaborating with partners to strengthen implementation. This work will continue as Alberta prepares for the launch of Phase II PPP on October 1, 2026, which will expand and standardize recycling services across the province.

By successfully implementing the Made-in-Alberta EPR system, ARMA has established a model that aligns with producer-led programs across Canada while reflecting Alberta's unique needs. The system empowers producers to design efficient, cost-effective recycling programs, supports the development of local recycling markets, and strengthens environmental stewardship through shared accountability.

A **Transitional** Period

This section summarizes activities and results from Alberta's first of two transitional years under EPR, covering the period from April 1 to December 31, 2025. While implementation continued beyond December 31, 2025, the observations and performance information presented in this report reflect the system as it existed at the end of the reporting period.

The launch of EPR on April 1, 2025, marked the beginning of a new approach to recycling in Alberta. Covering both the PPP and Hazardous and HSP categories, the launch represented the culmination of years of planning and collaboration among communities, producers, PROs, processing facilities, service providers, First Nations and Métis communities, government, and ARMA.

The transitional implementation period was designed to support the successful introduction of EPR across the province. Recognizing the complexity of transitioning to a producer-funded recycling system, Alberta adopted a practical, Made-in-Alberta approach that emphasized service continuity, stakeholder collaboration, and phased implementation. Throughout the year, stakeholders adapted to new roles, responsibilities, reporting requirements, and operational processes while ARMA monitored system performance, provided education and guidance, and supported ongoing implementation.

This transitional approach helped minimize disruption for residents and service providers while allowing stakeholders to establish new contractual, reporting, and operational relationships under the EPR framework. Existing collection services continued throughout the transition, and communities generally maintained their established material acceptance lists, providing continuity while the new producer-funded system was put into place. Additional details on Alberta's transitional implementation approach are provided in the Supporting a Successful Transition section of this report.

The following sections highlight the contributions of Alberta's communities, producers, PROs, and other service providers during the transitional first year of EPR implementation, and the progress made in establishing a transparent, accountable, and producer-funded recycling system.

Stakeholders in the EPR System

The following section highlights the contributions of Alberta's communities, producers, PROs, and other service providers during the transitional first year of EPR implementation, and the progress made in establishing a transparent, accountable, and producer-funded recycling system.

The diagrams below illustrate the roles and how different stakeholders interact with the system. Each plays a critical role in the overall EPR system. Producers, PROs and processing facilities are regulated parties under the Regulation, while communities have the option to register and receive EPR services.

ROLES

GOVERNMENT OF ALBERTA (GOA)

- Determine goals, outcomes and direction.
- Maintain legislative EPR framework (Act, Regulation) and broad policy direction.
- Oversee performance of ARMA in its oversight mandate.
- Consult/engage with ARMA as necessary.
- Enforce contraventions against the Act or Regulation.

OVERSIGHT AUTHORITY (ARMA)

- Develop and maintain bylaws and policies.
- Implement policies and procedures to deliver a level playing field and ensure compliance.
- Develop and maintain a registry system.
- Engage with stakeholders.
- Design measures to monitor and assess performance.
- Establish processes and escalation measures to compel compliance, referring to Ministry for enforcement being a last resort.
- Report on system health against outcomes set in regulation and keep the Ministry informed of issues.

STAKEHOLDERS

- Producers
- Producer Responsibility Organizations (PROs)
- Community Authorities
- Processing Facilities

ADVISORY COUNCILS

- Service Provider and Community Advisory Council: Brings together municipalities, Indigenous-support organizations, service providers, industry associations, recycling sector representatives, and government observers to reflect community perspectives and the practical realities of delivering recycling services across Alberta.
- Producer Advisory Council: Brings together PPP and HSP producers, industry associations, small business advocates, and government observers to reflect producer, retailer, manufacturer, and small business perspectives on the operational realities, opportunities, and challenges of Alberta's EPR system.

COMMUNITIES

All communities within the province can participate and receive services under EPR by registering with ARMA. Currently, 217 are participating in at least one of the EPR programs.

PRODUCER RESPONSIBILITY ORGANIZATIONS (PROS)

PROs manage the logistics (collection & processing) of the system on behalf of Producers. There are three PROs approved to operate in the Province.

PRODUCERS

Any Producer supplying designated materials into the Province must register and contribute to the cost of the overall EPR system.

PROCESSING FACILITIES

Recycle designated materials appropriately by meeting the designated material targets for each material category.

Communities

Communities played a central role in the launch of Alberta's EPR system. Phase I PPP began with strong participation across the province, with most Alberta communities choosing to register to participate in the April 1, 2025, launch. Because community participation in EPR is voluntary, this early uptake is especially significant: at the start of Phase I PPP, 217 communities were receiving EPR-funded service, representing approximately 94% of Alberta's population. This strong level of participation demonstrated broad community support for the program from the outset and helped support a smooth transition to producer-funded recycling services across much of the province during the 2025 operational year.

Throughout 2025, communities participated in a variety of forums designed to support information sharing, collaboration, and feedback during the transition to EPR. These included PRO-led municipal working groups, ARMA-hosted webinars and information sessions, and sector-led forums coordinated through municipal associations and advocacy organizations. These opportunities allowed communities to raise questions, share local perspectives, and better understand evolving roles, responsibilities, and implementation timelines.

ARMA focused on maintaining open and accessible communication with communities throughout the implementation. By participating in conferences and industry events, hosting webinars and information sessions, conducting virtual and in-person meetings across the province, and providing written guidance and ongoing support, ARMA helped communities navigate new regulatory and operational requirements and work with PROs and service providers to establish producer-funded service arrangements. These engagement activities also provided ARMA with valuable insights into community experiences, helping inform guidance development, system refinements, and ongoing transition support.

As Alberta prepares for Phase II PPP, ARMA will continue working with communities to support the expansion of recycling services across the province. Priorities include ensuring registered communities receive service in accordance with regulatory requirements and continuing outreach to eligible unregistered communities to share the benefits of participating in Alberta's EPR system.

217 communities started receiving service as of April 1, 2025, representing approximately 94% of Alberta's population under EPR.

Producers & Producer Responsibility Organizations (PROs)

Producers are at the center of Alberta's EPR system, assuming responsibility for managing the end-of-life recycling of designated materials they supply into the provincial marketplace. Under the Regulation, producers supplying PPP, HSP, or both material categories are required to register with ARMA. As of December 31, 2025, 1,036 PPP producers and 160 HSP producers were registered in Alberta.

During the first year of implementation, ARMA focused on supporting producers through education, guidance, and engagement activities, including:

- Maintaining a dedicated EPR support email;
- Publishing frequently asked questions and guidance documents;
- Hosting live webinars and providing recorded information sessions;
- Participating in producer association events;
- Engaging through advisory councils; and
- Meeting directly with producers to address questions and support compliance.

PROs play a critical role in delivering Alberta's producer-funded recycling system. Under Alberta's EPR framework, they are responsible for developing, implementing, and operating recycling systems on behalf of their member producers. Currently, one PRO is registered for the PPP program, and two PROs are registered for the HSP program, one for batteries and one for all other HSP products. Alberta's EPR system remains open to competition, and all future PRO applications will be evaluated according to the same regulatory criteria.

Throughout Phase I PPP, PROs established collection networks for their respective material streams across Alberta. This included developing and expanding curbside and depot-based PPP collection systems, implementing return-to-retail programs, and coordinating collection events and roundups for hazardous and special products to ensure safe and accessible end-of-life management. PROs also worked with communities to support continuity of service, address local considerations, and facilitate the transition from municipally managed programs to producer-led service delivery. These efforts were foundational to the successful launch and operation of Alberta's EPR system during the 2025 operational year.

PROs also delivered province-wide public education and awareness initiatives to support participation in Alberta's new recycling framework. Activities included digital advertising, social media campaigns, websites and recycling locator tools, printed materials, community resources, videos, school-based education initiatives, and participation in conferences, community events, and stakeholder engagements.

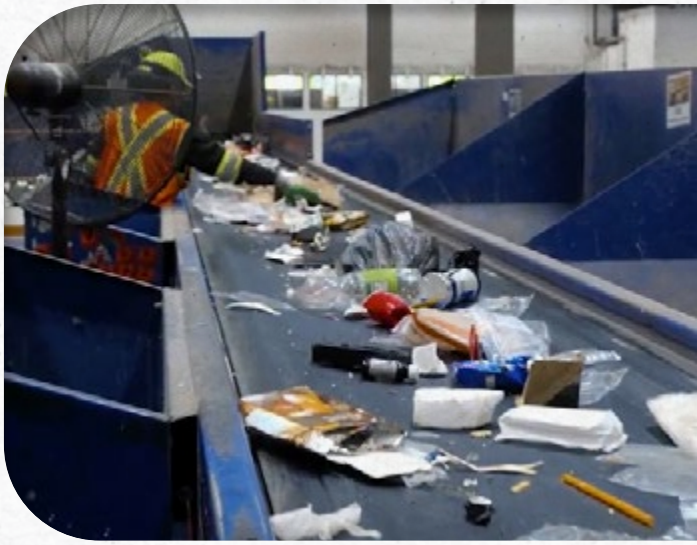
Processing Facilities

Processing facilities are an integral part of Alberta's EPR system, providing the infrastructure and expertise needed to manage designated materials after collection. Under Alberta's EPR framework, a processing facility is defined as a facility that receives designated materials for recycling, downcycling, treatment, disposal, or export to a jurisdiction outside Alberta for those purposes. Processing facilities play a critical role in ensuring collected materials are managed in an environmentally responsible manner while supporting Alberta's circular economy.

PROs are responsible for selecting and contracting with processing facilities to manage materials collected through Alberta's EPR system. These partnerships enable PROs to establish material management networks for the collection, transportation, processing, and end-of-life management of designated materials across the province.

During 2025, a total of 39 primary processing facilities participated in the PPP system, while nine primary processing facilities participated in the HSP system. These facilities managed designated materials through recycling, treatment, energy recovery, and other management methods, helping ensure Alberta's EPR system operated effectively during this transitional year of implementation.

For the 2025 operational year, reporting focused on primary processing facilities, which represent the first destination where collected materials are received and managed. Future reporting and oversight activities will improve visibility into secondary and subsequent processing stages. As Alberta's EPR system continues to mature, ARMA will continue strengthening its understanding of material flows throughout the broader recycling and recovery value chain.



Advisory Councils

In accordance with Article 14.2 of the Agreement on Administration and Oversight, ARMA established two formal advisory councils to support the implementation and ongoing advancement of Alberta's EPR system: the Service Provider and Community Advisory Council and the Producer Advisory Council.

Meeting twice annually, with additional meetings as required, the councils provide structured forums for collaboration, stakeholder feedback, and the exchange of operational and strategic perspectives. Their advice helps inform ARMA's oversight of Alberta's EPR system while identifying opportunities to strengthen implementation as the system evolves.

SERVICE PROVIDER AND COMMUNITY ADVISORY COUNCIL

The Service Provider and Community Advisory Council brings together organizations directly involved in delivering, supporting, and managing Alberta's recycling and waste management systems. Membership includes municipalities, regional waste management authorities, Indigenous-support organizations, industry associations, collection and processing service providers, representatives from Alberta's recycling sector. Alberta Environment and Protected Areas also participated, supporting transparency and information sharing between government and industry.

This council's diverse membership provides perspectives from communities of varying sizes, service providers, and organizations operating across Alberta. It also ensures discussions reflect the practical realities of material collection, transportation, processing, and end-of-life management. Representation from municipal and Indigenous stakeholders helps ensure the unique opportunities and challenges associated with delivering recycling services across Alberta's urban, rural, remote, First Nation, and Métis communities are considered as the system further develops.

During the first year of implementation, the council provided operational input on several key topics, including:

- Members viewed the Phase I transition as successful, with few issues requiring escalation.
- Members discussed Phase II expansion to multi-family dwellings and emphasized the importance of education, stakeholder engagement, and targeted support to help communities prepare for ongoing EPR implementation and general Phase II readiness.
- Discussions focused on Alberta's transition to a producer-funded recycling system and the flexibility in service delivery models available within the EPR framework.
- ARMA provided an update on processor due diligence, reinforcing the requirement for all processors participating in EPR to be registered with ARMA.

PRODUCER ADVISORY COUNCIL

The Producer Advisory Council was intentionally structured to reflect a broad cross-section of stakeholders impacted by Alberta's EPR system. Membership includes producers from the PPP and HSP sectors, representatives from national and provincial industry associations, and small business advocates.

The council provided perspective from retailers, consumer product manufacturers, specialty product producers, and the small business community. Alberta Environment and Protected Areas also participated, supporting transparency and information sharing between government and industry.

This diversity helps ensure discussions reflect the operational realities, opportunities, and challenges faced by organizations of different sizes and sectors.

- Members discussed the performance of Phase I EPR implementation and preparations for Phase II, including standardized materials and expanded recycling services to improve consistency and system performance. Members viewed the transition thus far as smooth and expressed support for upcoming Phase II enhancements.
- ARMA shared the 2024–2025 fee summary and the 2026 fee rates for PPP and HSP.
- Discussions focused on ARMA's compliance governance model, appeals body structure, and an update on the compliance framework. The compliance framework is built on education, prevention, and enforcement.
- Members discussed what they felt were ambitious material management targets, system costs, and emerging risks, including affordability, data quality, enforcement, and the importance of maintaining a balanced and cost-effective EPR system.

Supporting a **Successful Transition**

The first year of Alberta's EPR framework represented a significant transition from municipally managed recycling systems to a producer-funded and producer-operated model. While transitions of this scale inherently involve adjustment periods for communities, producers, PROs, processing facilities, and ARMA, Alberta's approach was designed to support a gradual and practical implementation that reflected the province's unique operating environment.

Recognizing the complexity of moving to a new service delivery model, ARMA and the Government of Alberta incorporated several transitional measures into the framework to help maintain service continuity and provide stability for residents and communities during the initial implementation period. For the PPP system, Phase I requirements were designed to build upon existing collection infrastructure rather than requiring immediate system-wide changes. Communities and residents continued to have access to collection services through depots and other collection locations that existed prior to April 1, 2025, helping ensure uninterrupted access to recycling services as responsibilities transitioned to producers.

Alberta also adopted a practical approach to accepted materials during the transition year. Rather than requiring immediate changes to material acceptance lists across the province, communities were generally able to continue collecting the materials they had historically accepted prior to April 1, 2025. This approach minimized disruption for residents, reduced operational challenges for processing facilities and other service providers, and allowed stakeholders to focus on establishing new contractual, reporting, and operational relationships under the EPR framework.

To support system readiness, ARMA required all PROs to submit readiness reports in advance of implementation. These reports provided assurance that collection, transportation, and processing systems were in place and prepared to support the launch of producer-led recycling programs on April 1, 2025. The readiness reporting process provided visibility into implementation planning and ensured potential issues were identified and addressed before system launch.

A key component of the Made-in-Alberta approach was a strong emphasis on stakeholder engagement, education, and communication. Throughout the transition period, ARMA worked closely with communities, PROs, First Nations and Métis Settlements, processing facilities, producers, and government partners to help stakeholders understand their responsibilities and prepare for implementation. Through conferences and industry events, webinars and information sessions, virtual and in-person meetings across the province, written guidance, and ongoing support, ARMA provided stakeholders with opportunities to ask questions, raise concerns, share local perspectives, and better understand their evolving roles and responsibilities. Feedback gathered through these engagement activities helped inform guidance development, implementation support, and ongoing system refinements while ensuring community perspectives were reflected throughout the transition.

Consistent with the transitional nature of 2025, ARMA's compliance activities focused primarily on education, awareness, and prevention. Recognizing that regulated parties were adapting to new requirements and processes, ARMA emphasized guidance, outreach, and support rather than formal enforcement measures during the initial implementation year. This approach helped stakeholders understand their obligations and successfully transition into Alberta's producer-funded recycling system while laying the foundation for a more mature compliance program in future years.

The experience gained during 2025 demonstrated the value of Alberta's measured, Made-in-Alberta approach to EPR implementation. By combining practical transitional measures with strong stakeholder engagement and regulatory oversight, ARMA and the Government of Alberta helped facilitate a manageable transition while maintaining service continuity and supporting the long-term success of the EPR system. The experience gained during this foundational year strengthened relationships, informed ongoing system refinements, and established a strong foundation for the continued growth of Alberta's EPR system.

2025 System Performance

Single-Use Products, Packaging and Paper Products

The activities and results presented in this section should be interpreted in the context of Alberta's transitional implementation period. As such, performance results largely exemplify the community-managed recycling system that was already in place prior to EPR, now being administered and managed by PROs under the EPR framework.

TABLE 1: 2023 PPP SUPPLY REPORT DATA (PRORATED)

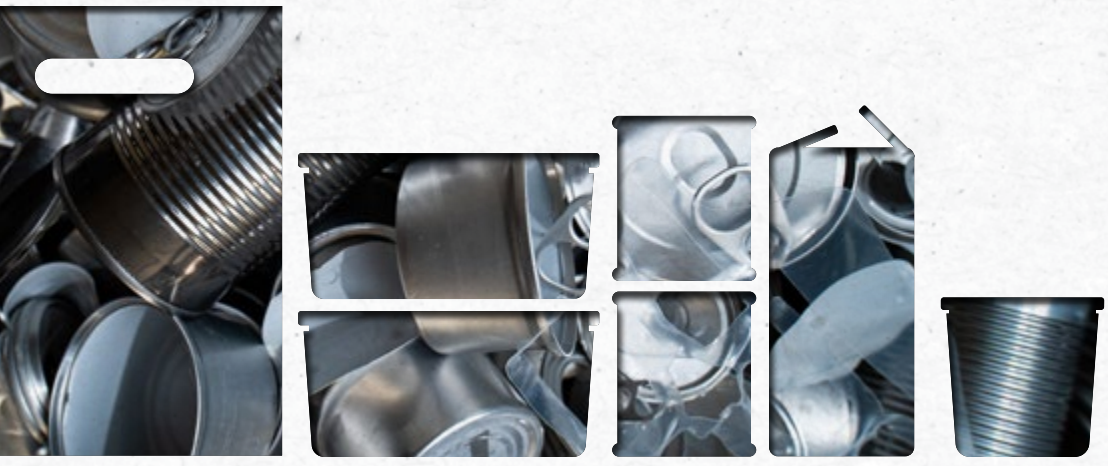
MATERIAL	PAPER (TONNES)	RIGID PLASTIC (TONNES)	FLEXIBLE PLASTIC (TONNES)	METAL (TONNES)	GLASS (TONNES)	TOTAL (TONNES)
Designated Material Supplied (Prorated)	**99,739**	**31,723**	**16,338**	**10,737**	**14,077**	**172,614**

Differences were identified between the supply dataset provided to ARMA by Producers and the supply dataset provided to the PRO by Producers. These differences may occur when supply data is reported to ARMA and the PRO separately and is not fully aligned at the time the annual report is due for submission.

To support data accuracy, consistency, and transparency, ARMA and the PRO have agreed to an ongoing reconciliation process to identify, investigate, and resolve reporting differences throughout the year. As 2025 represents the first year of EPR implementation and establishes a reporting framework, this reconciliation process will help strengthen data quality and support consistent performance measurement in future years.

The supply data presented in Table 1 is based on information submitted through the 2023 annual producer supply reporting process and represents material supplied to the Alberta marketplace during the 2023 calendar year by registered producers above the applicable thresholds. To align with the April 1 to December 31, 2025, operational period, the annual supply volume was prorated to nine months, resulting in a total supply weight of more than 172,000 tonnes.

PPP material management targets are calculated by dividing producer supply data from two years prior (n-2) by the collection and post-collection tonnage from the current year. Accordingly, 2023 supply data is used in conjunction with 2025 processing and material management data. This methodology allows time for third-party verification of PPP PRO supply data, aligns with approaches used in other Canadian jurisdictions, and corresponds with the producer fee model, under which 2023 supply data funds 2025 program activities.



The weight of materials collected and the methods by which they were managed are presented in Table 2.

For the purposes of this report, management methods are defined as follows:

- **Mechanical Recycling** – Materials are physically processed into secondary raw materials without changing their chemical structure and are used to manufacture new products.
- **Advanced Chemical Recycling** – A process that converts plastics into chemical feedstocks or new plastic polymers. This method was not used in Alberta's material management system in 2025.
- **Downcycling** – Materials are diverted to alternative uses that do not replace the original raw materials, such as waste-to-energy, aggregate substitution, land application, or composting. This method was not used in Alberta's material management system in 2025.
- **Disposed** – Material that was collected but neither recycled nor stored, calculated as the difference between total tonnes collected and the tonnes recycled or stored. No materials were managed through reuse, composting, energy recovery, or containment in 2025. Disposed materials were not counted towards the material management calculations.
- **Stored** – Material that has been processed and prepared for shipment to recycling end markets but has not yet been sold or shipped.

TABLE 2: PPP WEIGHT COLLECTED AND MANAGEMENT METHOD (APR. 1 – DEC. 31, 2025)

MATERIAL	PAPER (TONNES)	RIGID PLASTIC (TONNES)	FLEXIBLE PLASTIC (TONNES)	METAL (TONNES)	GLASS (TONNES)	TOTAL (TONNES)
Weight Collected	84,802	10,628	3,573	3,117	5,312	107,432
Managed By:						
Mechanical Recycling	81,995	6,592	751	2,762	3,433	95,533
Advanced Chemical Recycling	0	0	0	0	0	0
Downcycling	0	0	0	0	0	0
Otherwise Treated or Disposed	2,192	3,341	2,690	232	1,879	10,334
Stored	615	695	132	123	0	1,565

The 2025 processing results indicate that 90.4% of the 107,432 tonnes of material collected was shipped to recycling end markets and/or prepared and stored for shipment. Continued improvements in consumer participation, source separation, and expanded access to collection services are expected to increase recycling performance and material recovery over time.

"The single-use products, packaging and paper products (PPP) program, contributed more than $160 million in GDP, generated $75 million in wages, contributed $10.1 million in taxes, and sustained 1,230 full-time equivalent jobs in 2025."

Industry survey, Statistics Canada, PRO annual reports, ARMA data for FY 2025, and EY analysis

TABLE 3: PPP MATERIAL MANAGEMENT PERFORMANCE (APR. 1 – DEC. 31, 2025)

	PAPER	RIGID PLASTIC	FLEXIBLE PLASTIC	METAL	GLASS
2025 Actual (%)	83%	23%	5%	27%	24%
Target (%)	n/a	n/a	n/a	n/a	n/a

Table 3 presents Alberta's first province-wide material management results for PPP under the EPR Regulation. The results reflect material managed between April 1 and December 31, 2025, following the launch of Phase I.

Material management percentages are calculated in accordance with Section 19(2) of the Regulation by dividing the tonnes of material recycled, downcycled, or chemically recycled (including stored inventory) by the tonnes of material supplied, expressed as a percentage. The numerator reflects material managed during the reporting period, while the denominator is based on 2023 producer supply data (reported to ARMA in 2024), proportionally adjusted to reflect the nine-month operational period. This formula is illustrated below:

$$\textbf{Material Management Performance (\%)} = \left(\frac{\text{Weight Collected - Otherwise Treated or Disposed (Apr. 1 – Dec. 31, 2025)}}{\text{Designated Material Supplied (Prorated)}} \right) \times 100$$

The 2025 reporting period establishes Alberta's first consistent, province-wide reporting process for collection, processing, recycling, and material management performance under the PPP program. Because Phase I was designed to maintain existing recycling services and infrastructure during the transition to EPR, the results largely reflect Alberta's pre-existing recycling system while providing a benchmark for measuring future improvements. Future program enhancements, including a standardized provincial materials list and expanded curbside collection services beginning in Phase II, are expected to improve collection consistency and increase material recovery.

Hazardous and Special Products: **Batteries**

The HSP battery program manages consumer dry-cell batteries, including rechargeable and primary (single-use) formats weighing up to five kilograms, from both residential and commercial sources. Eligible batteries also include those that are damaged, defective, or orphaned. Materials outside the scope of the program include lead-acid batteries, wet-cell batteries, batteries weighing five kilograms or more, and embedded batteries reported through ARMA's Electronics Recycling Program.

For the 2025 reporting period, the numerator reflects batteries recycled between April 1 and December 31, 2025, while the denominator is based on 2025 producer supply data, proportionally adjusted to reflect the nine-month operational period, as shown below:

$$\textbf{Battery Recycling Performance (\%)} = \left(\frac{\text{Weight Collected and Managed (Apr. 1 – Dec. 31, 2025)}}{\text{Designated Material Supplied (Prorated)}} \right) \times 100$$

TABLE 4: 2025 HSP BATTERY SUPPLY REPORT DATA AND MATERIAL MANAGEMENT PERFORMANCE

MATERIAL	BATTERIES (TONNES)
Designated Material Supplied (Prorated)	**2,110**
Weight Collected and Managed (Apr. 1 - Dec. 31, 2025)	**354**
Material Management Performance (Apr. 1 - Dec. 31, 2025):	
2025 Actual (%)	**17%**
Target (%)	**n/a**

Material management performance for batteries presented in this report is based on supply data reported to ARMA. Differences were identified between ARMA's supply dataset and the 2025 sales volume data used by the Producer Responsibility Organization (PRO), primarily due to variations in the completeness of information available to each organization at the time performance calculations were completed.

To support data accuracy, consistency, and transparency, ARMA and the PRO have agreed to an ongoing process to compare and reconcile these datasets throughout the year. As 2025 represents the first year of reporting under Alberta's EPR framework and establishes a reporting framework, this collaborative approach will support continuous improvement in reporting quality and performance measurement in future years.

Table 4 presents the 2025 supply weights and material management results for batteries. Material management percentages are calculated in accordance with Section 26(2) of the Regulation by dividing the tonnes recycled during the reporting period by the applicable producer supply volume. Because battery material management requirements do not take effect until the 2027 operational year, there is no regulatory target for the 2025 reporting period.

For the 2025 reporting period, the numerator reflects batteries recycled between April 1 and December 31, 2025, while the denominator is based on 2025 producer supply data, proportionally adjusted to reflect the nine-month operational period.

During 2025, a province-wide collection network of 2,006 active collection facilities was established, providing Albertans with extensive and convenient access to battery recycling services. The network includes retail, public agency, and business collection locations, as well as specialized transportation solutions serving remote communities.

Future recovery rate calculations will transition to an industry-standard methodology based on the tonnes collected divided by the average supply volume from the previous three years. This approach more accurately reflects the lifespan of batteries and provides a more representative measure of long-term program performance.

As with PPP, the 2025 battery results establish the reporting framework for future performance measurement. Recovery rates are expected to increase as the program matures, and collection and management systems continue to develop.

Hazardous and Special Products: Non-Battery

Unlike PPP and batteries, the Regulation does not establish material management requirements for non-battery HSP.

TABLE 5: 2025 HSP NON-BATTERY SUPPLY REPORT DATA (PRORATED)

MATERIAL	FLAMMABLES (TONNES)	TOXICS (TONNES)	PESTICIDES (TONNES)	CORROSIVES (TONNES)	TOTAL (TONNES)
Designated Material Supplied (Prorated)	6,974	2,210	34	205	9,423

The supply data presented in Table 5 is based on information submitted through the 2025 annual producer supply reporting process and represents all designated non-battery HSP materials supplied into the Alberta marketplace during the 2025 calendar year. To align with the reporting period, annual supply volumes were prorated to reflect the April 1 to December 31 operational period.

TABLE 6: HSP NON-BATTERY WEIGHT COLLECTED AND MANAGEMENT METHOD (APR. 1 – DEC. 31, 2025)

MATERIAL	FLAMMABLES (TONNES)	TOXICS (TONNES)	PESTICIDES (TONNES)	CORROSIVES (TONNES)	TOTAL (TONNES)
Weight Collected	90	67	4	20	181
Managed By:					
Recycled	9	0	0	0	9
Energy Recovery	81	2	1	1	85
Treatment	0	0	0	17	17
Incineration	0	36	2	0	38
Deep Well	0	27	1	0	28
Landfill	0	2	0	2	4

The non-battery HSP program is designed to minimize the improper disposal of designated materials by providing accessible collection systems and ensuring that collected materials are managed in an environmentally responsible manner. While recycling remains the preferred outcome, where practical, many post-consumer HSP materials cannot be recycled because of regulatory requirements, limited processing options, or insufficient economies of scale. As hazardous waste, many of these materials require specialized treatment or disposal methods to protect human health and the environment.

The quantities collected and the methods by which they were managed are presented in Table 6.

For the purposes of this report, management methods are defined as follows:

- **Recycled** – Material is recovered and used for its original purpose or other value-added products.
- **Energy Recovery** – Material with heat value used as a supplemental fuel source at licensed facilities.
- **Treatment** – Removal of hazardous properties through chemical treatment, such as neutralizing corrosive materials.
- **Incineration** – Destruction of hazardous material at licensed high-temperature treatment facilities.
- **Deep Well Disposal** – Injection of material into approved underground geological formations.
- **Landfill** – Surface impoundment of the material at non-hazardous or hazardous landfills. Hazardous landfills are licensed, with specialized design and equipment to protect the environment from leachate and surface runoff.

Compliance Activities

As Alberta's EPR system completed its first year of implementation, ARMA's compliance activities focused primarily on the education and prevention pillars of its graduated compliance framework, which is based on education, prevention, and enforcement. Recognizing that 2025 represented the first of two transitional years for communities, producers, PROs, and processing facilities, ARMA adopted an approach focused on awareness and guidance. The objective was to ensure all regulated parties had meaningful opportunities to understand their obligations and successfully adapt to new regulatory requirements during the initial implementation of Alberta's EPR framework.

Producer responsibility organizations' promotion and education plans are an important component of Alberta's EPR system, supporting public awareness and helping Albertans understand their role in the system. ARMA will monitor these plans and related activities to ensure obligations under the regulation are met.

Throughout 2025, ARMA supported compliance through a range of educational and outreach activities, including stakeholder webinars, guidance documents, frequently asked questions, direct stakeholder engagement, participation in industry events, and ongoing support through dedicated communication channels. These activities were designed to improve awareness of registration, reporting, auditing, and operational requirements while helping stakeholders navigate the transition to a producer-funded recycling system.

As Alberta's EPR system matures, ARMA will continue to advance its compliance framework through this graduated approach. Beginning in 2026, compliance activities will increasingly incorporate formal verification and, where appropriate, enforcement measures to support the fair, consistent, and transparent application of regulatory requirements. In accordance with Article 22.9 of the Agreement on Administration and Oversight, future annual reports will summarize compliance activities undertaken during the reporting year, including education, prevention, and enforcement actions.

Looking **Ahead**

The 2025 transitional year marked the successful implementation of Alberta's EPR system and a significant milestone in the province's transition to a producer-funded recycling framework. As the first year of transitional implementation concludes, the results presented in this report establish Alberta's first province-wide reporting process for measuring future system performance. With Phase II PPP scheduled to begin on October 1, 2026, and regulatory material management requirements taking effect in 2027 (with reporting beginning in 2028), this will serve as an important benchmark for evaluating future progress.

The launch of HSP and Phase I PPP demonstrated strong participation by communities, producers, PROs, processing facilities, service providers, and other stakeholders across Alberta. While the system remains in the early stages of implementation, the transitional implementation year confirmed that the regulatory framework, partnerships, and governance structures are in place to support continued growth. Experience gained during 2025 has also provided valuable insight into system performance, stakeholder needs, and opportunities for continued refinement.

Looking ahead, ARMA's priority will be supporting the implementation of Phase II PPP on October 1, 2026. Phase II PPP will expand and standardize recycling services across Alberta and is expected to increase system coverage to 97% of the province's population. ARMA will continue working with communities, producers, PROs, processing facilities, and government to support a coordinated transition while promoting consistent service delivery across the province.

Significant investments have already been made to support system performance and prepare for the continued growth of Alberta's EPR system. Across the province, upgraded and new processing facilities are expanding the capacity to collect and manage designated materials. Within the HSP system, collection networks have become more accessible through expanded return-to-retail programs, community collection events, and technology-enabled collection solutions, including smart collection containers. Together, these investments strengthen Alberta's recycling infrastructure and help position the system to meet future regulatory performance requirements.

Over the coming year, ARMA will finalize and implement a comprehensive compliance framework centred on education, prevention, and enforcement. Additional priorities include strengthening reporting quality, improving transparency, enhancing stakeholder education and support, addressing free-rider concerns, and continuing to support communities, producers, PROs, and processing facilities as the system evolves. Like any large-scale regulatory initiative, the system will continue to be refined as experience is gained and new opportunities emerge. ARMA remains committed to ensuring Alberta's EPR framework remains effective, transparent, and accountable.

The first year of transitional implementation demonstrated what can be achieved through shared commitment and collaboration. Government, communities, Indigenous partners, producers, PROs, processors, service providers, and ARMA each played an important role in establishing Alberta's producer-funded recycling system. Building on the progress achieved during 2025, Alberta is well positioned to continue strengthening environmental outcomes, supporting innovation, and advancing a more circular economy. Together, these efforts will help ensure Alberta's EPR system continues to deliver lasting environmental and economic benefits while *inspiring a future without waste®*.

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