Regulatory requirements delayed further on sub-category 4 and 5 ag plastics

Date: March 3, 2026

Product/material: Ag plastics (Quebec)

Re: Regulatory requirements delayed further on sub-category 4 and 5 ag plastics

Important announcement
Quebec's *Ministère de l'Environnement, de la Lutte contre les changements climatiques, de la Faune et des Parcs (MELCCFP)* announced that regulatory obligations on sub-category 4 and 5 agricultural (ag) plastics listed in *the Regulation respecting the recovery and reclamation of products by enterprises (RRVPE)* will be delayed.

Sub-category 4 and 5 products are mainly plastics used for horticultural purposes like plastic mulch, sheeting for tunnel covering and drip irrigation systems, greenhouse coverings and various nettings.

Enterprises (or first sellers) now have until 2030 to set up recycling programs for these ag plastics that meet the requirements of the RRVPE. The recovery rate targets for these subcategories are delayed until 2035 onwards.

Cleanfarms in relation to sub-category 4 and 5 ag plastics
Cleanfarms is presently the OGR (Organisme de Gestion Reconnu) for sub-categories 1, 2, 3, 6, and 7, which means that enterprises that supply products that are part of these sub-categories can meet their regulatory obligations by becoming a Cleanfarms member.

Cleanfarms may put itself forward to become the OGR for products listed in sub-categories 4 and 5, provided the regulatory framework allows for the adequate collection of ecofees which finance the programs we offer. Adequate funding is critical.

The organization supports this delay, which is in line with the advice we've provided. It reflects the complexity of program development in the agricultural sector and should allow for a more structured, well-adapted rollout that includes:

- First seller education and engagement
- Cost modelling and financial planning to properly estimate ecofees that are paid for by first sellers
- The establishment of pilot projects that allow for the proper development of collection and processing that meets the technical requirements from recyclers
- Proper program planning

The long term success of any program requires collaboration across multiple stakeholders, government support, and adequate funding. These two subcategories pose several challenges that will likely need to be addressed via regulatory changes to ensure ecofees are applied to all imports and that all first sellers/importers, including those that import for their own use, are fully participating.

For more information
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