

Application for Extension to Federal Plastics Registry Deadline of September 29

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The Federal Plastics Registry (FPR) introduced new reporting obligations for producers of certain plastic products placed on the Canadian market in 2024, with the first deadline set for September 29, 2025. We previously provided an overview of these Phase 1 requirements, which can be found in our earlier [article](#).

Environment and Climate Change Canada (ECCC) has now provided official directions on how organizations may apply for an extension to the September 29 reporting deadline. Under subsection 46(6) of the *Canadian Environmental Protection Act, 1999* (CEPA), the Minister may, on request in writing, extend the date within which the person shall comply with the notice. To request an extension, organizations must submit a letter on company letterhead, and have it signed by an official including their job title. The extension request must include the organization's legal name, business number, civic address, the reasons for requesting an extension and the actual date you are requesting the deadline to be extended to. Requests must be emailed to the FPR's general email account (rpf-fpr@ec.gc.ca). Extensions may be granted where technical issues with the online platform, organizational restructuring, unforeseeable circumstances (such as natural disasters or medical emergencies), or the need for additional time to complete calculations or validate data accuracy can be demonstrated. ECCC has advised that decisions will be made within 10 business days of receiving a complete request.

Given the short extension period available and ECCC's 10-day review timeline, organizations that anticipate challenges meeting the September 29 deadline should file an extension request as soon as possible and continue working diligently toward completion of their reporting obligations. Please contact Janet Bobechko if we can be of assistance in applying for an extension or meeting your FPR reporting requirements.

The information and comments herein are for the general information of the reader and are not intended as advice or opinion to be relied upon in relation to any particular circumstances. For particular application of the law to specific situations, the reader should seek professional advice.

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Janet Bobechko is a Certified Specialist in Environmental Law and a nationally recognized senior practitioner with extensive experience in all aspects of environmental law, climate change and sustainability, including supply chain transparency.

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