



GUIDANCE DOCUMENT TO CANADA'S FRESH PRODUCE INDUSTRY

Rationale and Guidance for Migrating to Certified Industrial Compostable PLU Stickers | Winter 2023

THE CHALLENGE OF PLU STICKERS FOR CANADA'S PRODUCE SECTOR

Price Look Up (PLU) stickers play an important role in the fresh produce industry, globally and in Canada. In use since 1990, PLU stickers are integral in helping accurately and effectively identify the produce in question, providing better inventory control, and making scanning and pricing at checkout easier – all resulting in maximum efficiency in produce distribution, helping keep prices low for consumers.

A significant portion of discarded PLU stickers accompany produce waste streams such as peelings, fruit cores and expired product – all of which are high value input to Canada's industrial organics recycling industry. PLU stickers which accompany produce residuals can unfortunately physically contaminate the composting processes, adversely impacting the compost quality and value.

Canada's fresh produce sector acknowledges that the adverse impacts of PLU stickers on Canada's industrial organics recycling industry should be mitigated. In response, The Canadian Produce Marketing Association and many of its members have been working closely with the Compost Council of Canada to determine how best to mitigate the adverse impacts of PLU stickers on Canada's industrial organics recycling industry – and its customers – which includes Canada's fresh produce sector.

These efforts are in line with a growing international awareness and response to minimizing the impacts of PLU stickers on the industrial organics recycling industry, and the environment more broadly.

THE FRESH PRODUCE INDUSTRY'S RESPONSE

To mitigate the impacts of PLU stickers on Canada's industrial composting industry, the CPMA is **encouraging Canada's fresh produce sector to migrate to certified industrially compostable PLU stickers.**

The following guidance and recommendations are provided to help the fresh produce industry move forward with this important initiative.

CONSIDERING A CERTIFIED INDUSTRIALLY COMPOSTABLE PLU STICKER

When exploring options for migrating to certified industrially compostable PLU stickers, request the following information from your supply chain partners:

- What industrially compostable PLU solutions are available to replace non-compostable PLU stickers?
- What compost quality standard does the compostable PLU solution currently meet?

- Is the compostable solution designated as **certified** industrially compostable? If yes, what certifying organization granted the certificate? If not, is certification being pursued, and if so, what is the status of the certification process (i.e., who is the certifying organization, what is the status of application, what are the anticipated timelines, etc.).
- Does the current compostable solution consider or anticipate future changes in industrial composting standards and related requirements?

A summary of these considerations is outlined below.

WHAT IS A CERTIFIED INDUSTRIALLY COMPOSTABLE PLU STICKER?

A **certified industrially compostable PLU sticker** is one which:

- complies with defined industrial compost quality standards,
- is tested by an accredited laboratory, and
- is certified by a recognized certification body.

Certification provides assurances that the industrially compostable PLU stickers:

- Decompose at a rate that is required by industrial composting systems,
- Produce trace elements that are in accordance with defined compost quality standards, and
- Result in biomass which meets the expectations of the agriculture sector, such as having no adverse impacts on plant growth and meeting eco-toxicity requirements.

A PLU sticker is composed of three components: a sticker substrate, inks and an adhesive. Consequently, **all PLU sticker components, once combined, must meet the required compost quality standards.**

All PLU stickers **irrespective of substrate composition**, be it plastic, paper or other materials, are subject to this guidance document.

APPLICABLE COMPOST QUALITY STANDARD IN CANADA

At the time of this advisory notice, **the following BNQ standard is applicable to industrially compostable materials including plastics, paper fibre as well as any other substrates:**

[BNQ 0017-088 \(2010\)](#)

Consequently, **irrespective of PLU substrate composition OR combination of substrate, ink(s) and adhesive(s)**, PLU stickers within the Canadian marketplace should follow the BNQ standard to ensure the desired control of constituents and rate of degradation for product disintegration, thereby resulting in no adverse effects of compost on terrestrial organisms.

ASSESSING THE STATUS OF CERTIFICATION

At the time of this notice, the use of certified industrially compostable PLU stickers is voluntary in Canada. Nonetheless, the Canadian compost industry strongly encourages that compostable products such as compostable PLU stickers be certified to ensure that they meet the applicable BNQ standard. Seeking certification ensures that as developments in compostable materials rapidly advance, and that standards are revised in Canada, compostable products will continue to meet the applicable standards.

To confirm the status of certification, documentation should be requested that confirms compliance with the BNQ standard identified above. **At the time of this notice, [BNQ](#) is the only organization issuing certification of compliance with the BNQ standard.** As such, existing certificates of compliance from organizations such as [BPI](#), [TUV Austria](#), or other organizations, can be a helpful foundation for seeking BNQ certification, as these certifying organizations will demonstrate that a comparable compost quality standard has been met and that test results demonstrating industrial composting performance has been performed by an accredited laboratory.

Given the lack of a global composting standard at the time of this notice, different composting standards are in effect across various markets and regions around the world ((e.g., BNQ 0017-088, ASTM D6400, EN13432, others). As noted above, this results in certifications providing assurances for some composting standards but not others. Furthermore, given the evolving landscape in terms of compostable materials and applicable standards, some compostable solutions may seek alternative accreditation or acceptance, such as what is offered by the [Compost Manufacturing Alliance](#).

In instances when certification is being sought (as part of a business strategy, or due to a customer requirement), it is recommended to contact the [Compost Council of Canada](#) or the [BNQ](#) to confirm if existing or planned certifications provide compliance with the applicable composting standard in Canada.

ANTICIPATING REVISIONS TO APPLICABLE STANDARDS AND INTERNATIONAL CONSIDERATIONS

The state of compostable solutions which meet applicable and future composting standards is evolving as product material advancements seek to meet, if not exceed the composting industry's increasing requirements for suitable and acceptable compostable materials. These considerations, both in Canada and internationally, should inform a strategy for migrating towards compostable PLU solutions.

An Evolving Canadian Context

In 2021, the International Organization for Standardization (ISO) issued their updated voluntary standard, ISO 17088:2021 – Specifications for compostable plastics. The document specifies procedures and requirements for plastics, and products made from plastics, that are suitable for recovery through organics recycling. In Canada, the Bureau de normalisation du Québec (BNQ) is responsible for the management and updating of ISO 17088:2021 within the context of conditions and regulatory requirements pertaining to industrial-scale composting of **all compostable materials**, as determined by the ISO representative in Canada, the Standards Council of Canada (SCC).

In light of the updated ISO standard, Canada's industrial composting industry has requested that the Canadian standard not only meet but seek to exceed the ISO 17088:2021 requirements in order to produce the highest quality compost possible. This includes calling for all compostable materials to meet

50 % of the maximum trace element concentrations of Category AA as prescribed in the [Ontario Compost Quality Standards](#) – a change reflecting the strictest trace element levels of the Canadian Council of Ministers of the Environment guidelines – thus ensuring scope and coverage throughout Canada.

Similarly, at the time of this advisory notice, the ISO 17088:2021 disintegration test requires that compostable material meet an 84-day period for disintegration. As is the case with the trace element levels outlined above, Canada’s industrial composting industry has requested that the Canadian standard not only meets but seeks to exceed the ISO 17088:2021 requirements by reducing the disintegration time to 45 days.

Although these more stringent requirements are not applicable at the time of this advisory notice, they represent the aspirational targets currently being pursued by Canada’s industrial composting industry, and should be considered accordingly.

International Considerations

International best practices should be considered given the relatively small scale of the Canadian market, combined with the significant portion of fresh produce which is imported each year. Furthermore, Canada’s industrial composting industry, as outlined above, is seeking to increasingly align with international best practices in terms of industrial composting standards.

Consequently, current Canadian composting requirements could evolve over time to align more closely with the most stringent global standard originating in Europe: [EN 13432 \(2000\)](#). Consequently, considering the benefits of compliance with EU jurisdictions could help meet Canadian requirements now and into the future. Similarly, Canadian requirements could evolve over time to differ considerably from the [ASTM D6400](#) and [ASTM D6868](#) standards which are currently applied in the US. Any related risks should be identified and mitigated.

Strategies guiding the transition from non-compostable to industrially compostable PLU stickers should make best efforts to account for these international considerations while bearing in mind adherence to the compost quality regulatory standards to which Canadian composting facilities must adhere.

RECOMMENDATIONS TO CANADA’S FRESH PRODUCE INDUSTRY

- Although there are currently no regulatory requirements to use certified industrially compostable PLU stickers for either imported or exported fresh produce, Canada’s fresh produce sector is strongly encouraged to take best efforts to plan for and adopt industrially compostable PLU stickers.
- Although such measures would be voluntary, the industry is strongly encouraged to engage their supply chain partners to develop timelines for migrating to industrially compostable stickers.
- The industry is encouraged to develop a roadmap that identifies industrially compostable solutions, confirms that these solutions align with currently applicable compost quality standards in Canada, seeks to adopt a certified industrially compostable solution, and anticipates developments and revisions in applicable compost quality and compostable standards.

- Canada's fresh produce sector is encouraged to align with international best practices, notably given the significant volume of imported produce into Canada. Consequently, industry should seek compliance with international industrial compost quality standards which can also help meet or exceed Canadian standards.
- To account for global trends and developments seeking to mitigate the adverse impacts of PLU stickers on the industrial composting industry, and the environment more broadly, the produce industry is encouraged to strengthen coordination and engagement with key stakeholders, such as the Compost Council of Canada, and Canadian certification bodies such as the BNQ, to ensure that Canada's efforts align with global best practices. This includes identifying and responding to emerging non-industrial composting requirements, for example.