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INSIGHTS FROM A CIRCULAR ECONOMY POLICY INVENTORY FOR CANADA

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Insights from a circular economy policy inventory for Canada

Abstract

Policymakers globally are showing growing interest in circular economy (CE) policies to reduce the negative externalities associated with resource extraction, resource use and waste disposal. Addressing these challenges effectively requires coordinated and multi-level policy action.

Canada's circularity rate—defined as the share of recycled materials in circulation in a country as a share of total material consumption—was 6.1% in 2020. This is lower than the global average of 8.6% and well behind leaders like the Netherlands (30.6%) and Italy (20.8%). One of the barriers to progress in Canada is jurisdictional complexity, which can result in fragmented and poorly harmonized policies. This paper draws on findings from a new policy inventory to provide a snapshot of Canada's current CE policy landscape. It aims to support more harmonized policymaking.

To date, Canada has rightly prioritized policy development in sectors with high waste and high resource needs, including Construction and the Built Environment, Mobility and Transport Systems, Food and Agriculture and Electronics. However, compared to European counterparts, Canadian policies tend to emphasize Waste Management, while giving less attention to policy categories like Business Support, Brokering, Research and Innovation and Fiscal Incentives. Going forward, it will be important to foster the ecosystems for circular business models to flourish, which includes shifting policy attention toward enabling innovation and market development.

This paper also touches on how circular and climate policies can complement and clash with one another. While CE policies pursue broader objectives than climate policy alone, the CE policy inventory can help identify complementarities between the two for amplified impact.

Introduction

Amid rising environmental pressures, production and consumption models have globally come under scrutiny for their contribution to the transgression of multiple planetary boundaries (Rockström et al. 2009). In this context, policymakers are showing growing interest in CE policies that mitigate externalities associated with resource extraction, resource use and waste disposal by correcting price signals, reducing coordination

barriers, fostering knowledge diffusion and funding research and innovation (Barrie et al. 2024). As CE policy development accelerates, there is a need to better understand how to design and implement CE policies so that they meet their objectives of mitigating the negative externalities associated with resource extraction, resource use and waste disposal. This paper contributes to that effort by examining the evolving landscape of CE policies in Canada at municipal, provincial, territorial and federal levels.

Various global policy frameworks have emerged in the last decade to categorize CE policies (Abu-Bakar et al. 2024; Barrie et al. 2024; World Bank 2022; Cairns et al. 2018). But efforts to track these policies and their effectiveness have been limited to date, particularly at the sub-national level. Barrie et al. (2024) represents a first effort to inventory national CE roadmaps globally and lays essential groundwork for categorizing CE policies. An inventory of sub-national CE policies is currently lacking, which is an important omission for federated countries like Canada and given that municipal and regional levels have been identified as critical for scaling the CE (Rajaonson 2025). As a rapidly developing policy area, it can be challenging to monitor the evolving policy landscape. Addressing the market failures of over-reliance on virgin materials and waste disposal requires coordinated and multi-level policy action. Failure to coordinate risks a patchwork of policies that may not complement one another and could counteract one another. A policy inventory allows for quick identification of what other provincial and municipal governments are doing, setting the stage for policy harmonization and cross-jurisdictional learning.

This paper describes the methods used to develop a Canadian CE policy inventory and provides unique analysis using the inventory. The inventory depicts the CE policy landscape at the municipal, provincial, territorial and national levels. It mirrors the structure of the Canadian Climate Policy Inventory (Scott et al. 2024) that was developed by the Canadian Climate Policy Partnership, led by Dr. Jennifer Winter at the University of Calgary. It employs the same CE policy categories as Barrie et al. (2024) to enable international comparison. Our research question in developing this inventory is: *What is the current landscape of municipal, provincial, territorial and federal CE policies in Canada*?

In developing the CE policy inventory for Canada, we focused on policies initiated by governments and excluded initiatives by business or community organizations[1]. A CE policy refers to public interventions that enable, incentivize or directly implement circular production and consumption models. Taking a broad definition of policy, we included

[1] Initiatives by organizations are summarized in a separate database here.

strategies, roadmaps, instruments and regulations that aim to address market failures associated with over-reliance on virgin materials and waste disposal.

The remainder of this paper describes the methodology used in assembling the CE policy inventory, stating its limitations and sharing findings on policy composition by jurisdiction, sector and category. It closes by discussing the findings and possible future extensions of the inventory.

Data and method

Assembling policies for the CE policy inventory

Policy documents were compiled from November 2024 to April 2025 in a five-step process (See Figure 1 below). First, we leveraged the expertise of the Government-to-Government CE Policy Incubator (G2G), an initiative bringing together 12 government and two research partners to accelerate Canada's CE, led by Circular Economy Leadership Canada. These government partners opted into the G2G network and represent jurisdictions that are leaders in CE policy. Given that CE is an emerging policy area in Canada, and there is no accepted definition of circularity, we aimed for a broad coverage of policies and largely relied on the expertise of the G2G network to share what they considered to be CE policies. We invited all partners of the network (37 people across 12 organizations) to share policies to produce an initial list of 66. Second, we developed a draft coding framework based on this initial list of policies. Third, we reached out to academics and government partners informally by email to invite them to review the policy list for gaps and to provide feedback on the coding framework. Circular economy is only emerging as a focus in academic circles in Canada, and we identified three academics with expertise in three sectors: construction, food systems and supply chains. This step led to the addition of 33 policies. Finally, after incorporating feedback, we carried out a targeted Google search for policies in jurisdictions less well-represented by the G2G network[2], which led to 23 additional policies. The final list contains 122 policies.

In deciding whether a policy should be included in the inventory, the following inclusion and exclusion criteria were applied. Policies were included if defined as "circular" by the implementing government or if they employed commonly accepted circular approaches, such as reuse, repair or recycling. Policies were included if they were announced, proposed, in progress or implemented at the time of the search. They were excluded if cancelled, elapsed, sunset, no longer funded or if initiated by a non-government entity

[2] Keywords used in this targeted Google search were "circular economy", "Canada", (all province names), "municipalities", "circularity", "reduce", "reuse", "recycle", "remanufacture", "repurpose", "repair", "roadmaps", "strategy", "regulation", "policy", "waste reduction", "EPR" and "bans".

(in which case we considered them not policies but “initiatives”). It is worth noting that policies were not included or excluded according to their potential or actual success at implementing circularity. In triaging the list of policies from government and academic experts, we included 33 policies and excluded 50. Most of these exclusions were “initiatives” driven by non-government organizations and are recorded in a separate database.

While all 10 Canadian provinces are represented in the inventory, only some municipalities are represented. British Columbia (Burnaby, Langford, Richmond, Vancouver, Victoria, Whistler) and Ontario (Durham, Markham, Mississauga, Toronto, Ajax) have the most municipal-level policies in the inventory. There are also a handful of municipal-level policies from Quebec (Montreal), Nova Scotia (Halifax, Colchester) and Alberta (Edmonton).

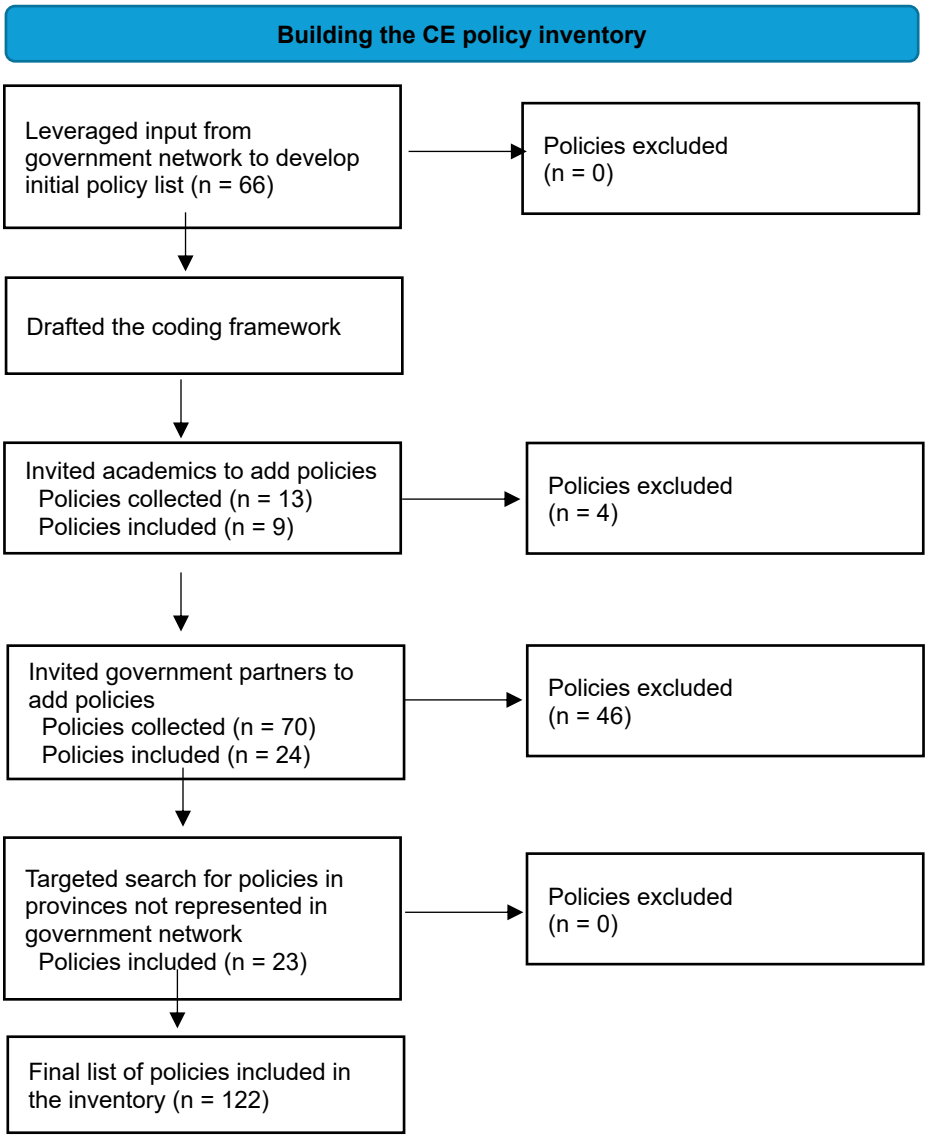

Figure 1: Flow diagram of CE policy inventory assembly process

Coding CE policies

To allow for analysis, CE policies (n = 122) were qualitatively coded to describe the policy instruments and to distill them into discrete categories (see Table 1 below for codebook). The coding categories mirror those from the Canadian Climate Policy Inventory. Adoption of this parallel structure is intended to support future policy research. For example, it could enable an exploration of the decarbonization opportunities posed by circularity. The following coding classifications were adopted from the Climate Policy Inventory: Status, Jurisdiction, Instrument Type and Scope.

The remaining coding classifications are unique to the CE policy inventory: Sector, CE Policy category, 9Rs category, and Policy Type. The Sector category is not a standard sectoral classification (such as the North American Industry Classification System) but rather a circularity-specific classification of sectors and materials that are typically subject to CE policies. The CE Policy categories were taken from a global study carried out by Chatham House and the United Nations Industrial Development Organization (UNIDO) in 2024. The 9Rs category is based on a CE framework that prioritizes the prevention of waste (Refuse, Rethink, Reduce, Reuse, Repair, Refurbish, Remanufacture, Repurpose, Recycle, Recovery). The Policy Type category is based on a clean innovation framework (Elgie and Brownlee 2017), where Push policies are those that drive new ideas, Pull policies are those that create new markets, Grow policies support businesses in turning ideas into marketable products and services, and Strengthen policies make the system more effective and resilient. For each of these classifications, policies could be assigned to more than one category.

Coding was carried out by a graduate student and verified by a senior analyst. Feedback received from government partners on the coding framework was discussed among the research team and final decisions were implemented by the graduate student.

Category	Code	Category	Code
CE Policy	Brokering	Jurisdiction Type	Municipal
	Business Support		Provincial
	Circular Infrastructure		Territorial
	Consumer Habits		Federal
	Education and Skills		Federal/Provincial/Territorial
	Extended Producer Responsibility (EPR)	Sector	Public Facilities
	Fiscal Instruments		Construction and Built Environment
	Monitoring		Plastic
	Municipalities and Local Authorities		Food and Farming
	Policy Design		Energy
	Product Requirement		Mining
	Public Procurement		Electronics, Batteries and ICT
	Research and Innovation		Forestry and Bioresources

	Resource Management	Mobility
	Roadmap Governance	Industrial, Commercial and Institutional
	Sector-level Action Plans	Textiles
	Standards	Chemicals
	Trade Policy and International Governance	Nature Restoration
	Waste Management	Furniture
	Worker and Consumer Rights	Renewables

Table 1: Codebook used for content analysis of CE policies. Category descriptions are available as part of the full inventory database, available at: https://circulareconomyleaders.ca/resources/building-canadas-circular-economy-knowledge-base-inventories-of-circular-economy-policies-and-initiatives/.

Limitations

This inventory is a first for Canada and represents a potentially powerful tool to support policy development and harmonization, as well as research. That said, the methodology faces limitations that could be addressed in future iterations.

As noted earlier, policies were not included or excluded according to their potential or actual success at implementing circularity. Relatedly, policies were not weighted based on scope or expected impact. This implies that a policy count is not an accurate picture of CE policy coverage or stringency across Canada, as it does not consider the scope or impact of policies. For instance, a single federal policy that addresses market signals in favour of circular approaches will likely have a larger impact than a municipal recycling policy. But each of these policies receive equal weighting in the inventory. The inventory also takes a broad definition of "policy" and includes roadmaps and strategies for planned policy actions.

The inventory currently includes federal, provincial and some municipal and territorial policies. In future iterations, it would be worthwhile to improve coverage of territorial and northern municipal policies. For instance, there have been notable efforts to develop CE solutions to waste management in First Nations communities in Northern Ontario (Circular Innovation Council 2018).

Finally, the targeted desktop research was focused on key terms that are unlikely to identify policies that are not explicitly characterized as "circular." Some relevant policies may have been overlooked.

Findings

Policy snapshot by jurisdiction and category

The search process yielded 122 CE policies, including those at the municipal (61) provincial/territorial (45) and federal (14) levels. There were also two policies that involve federal/provincial/territorial partnerships. For instance, the Canada-wide Strategy on Zero Plastic Waste aims at targeted actions, partnerships and investments at all levels of government. Four provinces stand out as having the most CE policies: British Columbia

(34), Ontario (29), Quebec (15) and Nova Scotia (10) (See Figure 3a below). The bulk of policies (75) were introduced between 2020-2024 and the earliest policy was introduced in 1977 (See Figure 3b below). Across all jurisdictions, Waste Management (84) is the most common policy category.

Figure 2 below summarizes CE policies by category and by jurisdiction type and provides a sense of the distinct roles played by Canada's federal, provincial/territorial and municipal governments in supporting circularity. The most common policy categories at the federal level are Waste Management (5), Fiscal Instruments (5), Product Requirement (4), Research and Innovation (4), Worker and Consumer Rights (4) and Trade Policy and International Governance (4). At the provincial and territorial levels, the most common policy categories are Waste Management (31), Extended Producer Responsibility (EPR) (20), Resource Management (16) and Circular Infrastructure (9). At the municipal level, Waste Management tops the list (47), followed by Resource Management (25), Circular Infrastructure (19), Education and Skills (11) and Standards (11).

Over time, the focus of CE policies has broadened. Prior to 2016, policies were narrowly focused on Waste Management, Resource Management, Standards and EPR. Since 2016, the share of policies in each of these initial areas has declined and the focus has expanded to include a broader array of policy types, including Circular Infrastructure, Education and Skills and Product Requirements.

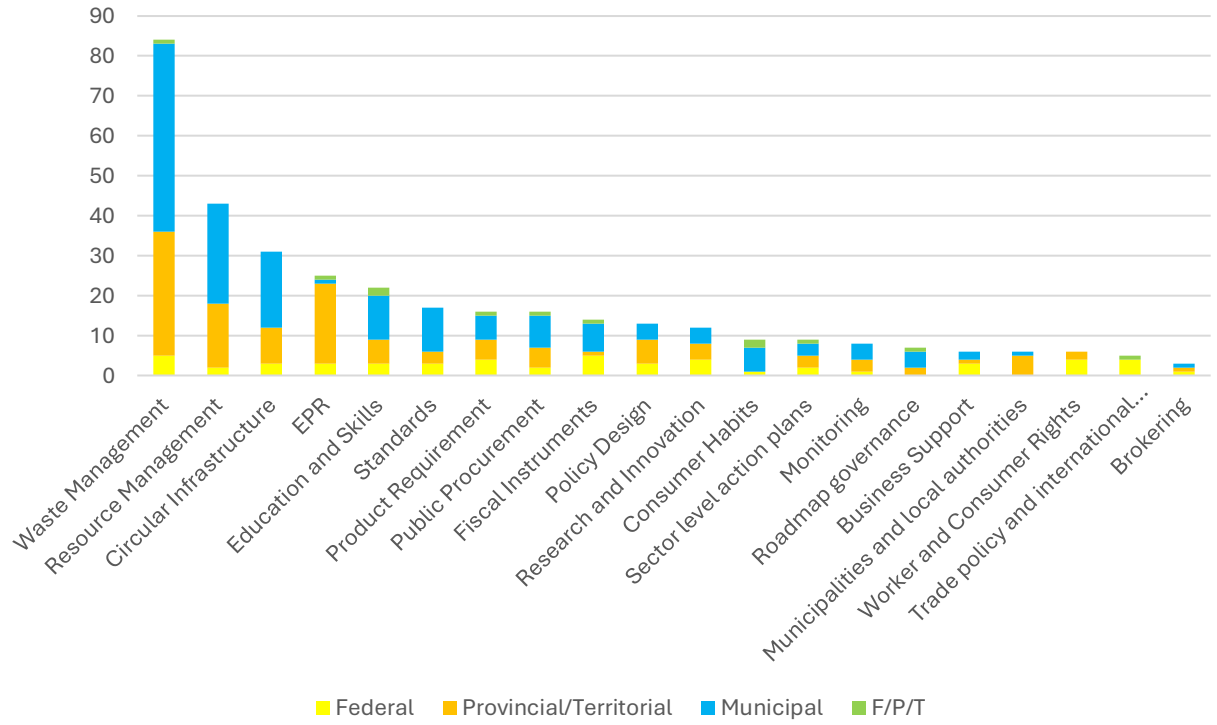

Figure 2: Count of CE policies by category and by jurisdiction type

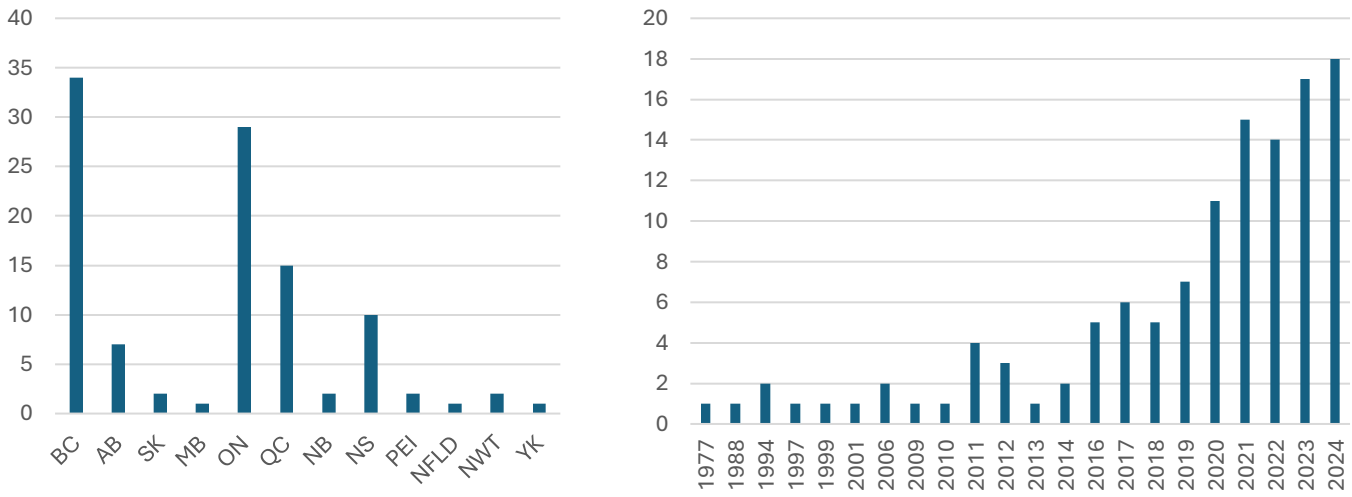

Figure 3a: Policy count by province/territory; Figure 3b: Policy count by year introduced

Policy snapshot by sector

Circular economy policies in Canada are concentrated in Construction and the Built Environment (48), Industrial, Commercial and Institutional (38), Public Facilities (38), Waste Facilities (24) and Electronics, Batteries and ICT (23) (See Figure 4 below). The main policy categories in Construction and the Built Environment—the sector with the most policies—are Standards, Public Procurement, Product Requirements and Waste Management.

Municipal policies represent more than half of all policies in certain sectors: Construction and the Built Environment, Textiles, Food and Farming, Public Facilities, Waste Facilities, Nature Restoration and Renewables. This partially reflects areas of municipal jurisdiction, but also that municipalities are most directly exposed to problems related to waste management, food systems and construction. Provincial policies dominate in Chemicals, Electronics, Batteries and ICT, Plastic and Mobility. Federal policies are most prominent in Energy, Forestry and Bioresources, and Food and Farming.

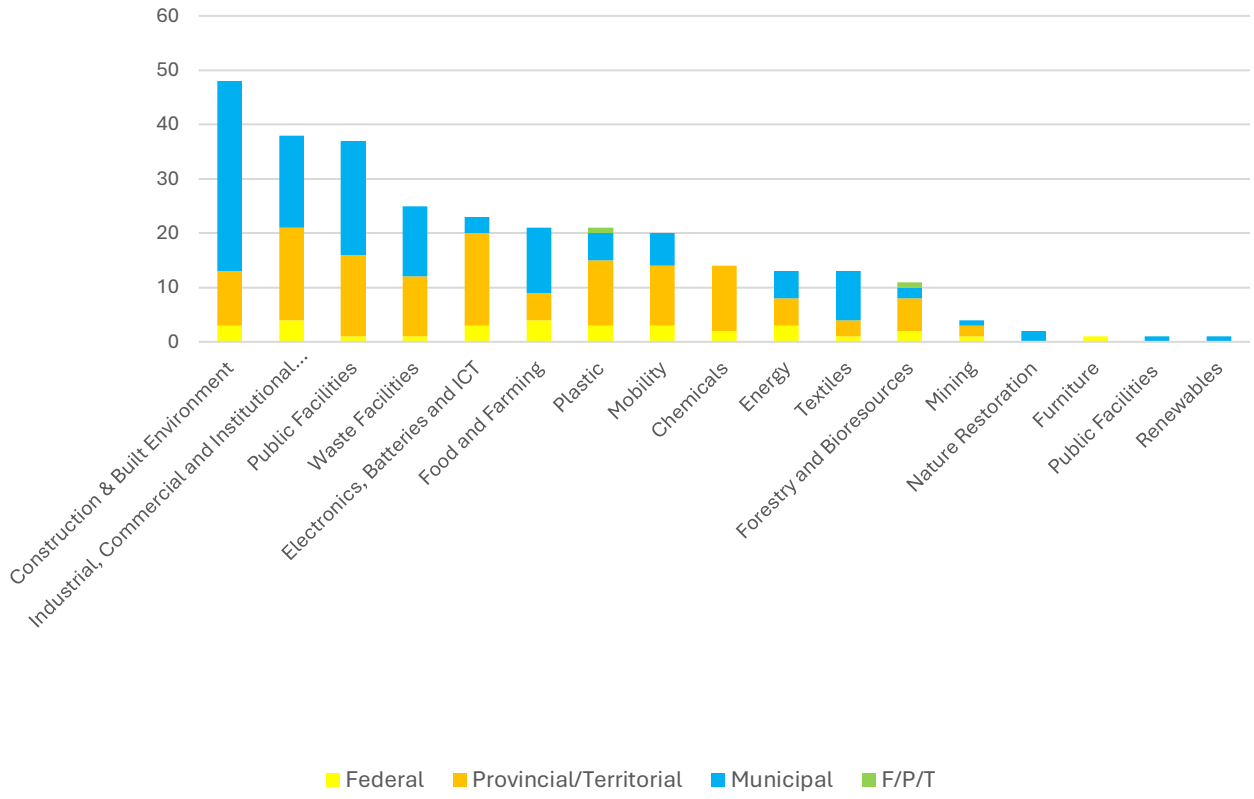

Figure 4: Count of CE policies by sector and by jurisdiction

Discussion

Canadian CE policies are focused on high-impact sectors

Canadian CE policies are currently focused on high-impact sectors where they can be most beneficial. The following four sectors consume the most materials and produce the most emissions globally: Housing and the Built Environment; Mobility and Transport Systems; Food and Agriculture and Consumer Goods (especially electronics and textiles) (Circle Economy 2025). All but one of these sectors is targeted by 20 or more policies in the Canadian CE policy inventory, while the average sector is targeted by 15 policies. The textiles sector is an exception in that it is a high-impact sector but only targeted by 12 policies. Note that many policies target multiple sectors. For instance, of the 20 policies that target the Mobility sector, only four are specific to that sector, such as Canada's Clean Fuel Regulations and Clean Fuels Fund. The remaining 16 policies are cross-cutting, such as the City of Richmond's Procurement Policy, which integrates CE principles into the city's procurement processes across all sectors.

Canada is early in its journey to becoming circular and can learn from other countries

The Council of Canadian Academies identified several barriers that Canada faces in shifting to a more circular economic system. These include economic incentives favouring the linear economic model, firms facing difficulties building trust across supply chains, lack of practical information for firms about how to apply circular business models, jurisdictional complexity that complicates policy alignment and a culture of consumerism (Council of Canadian Academies 2021).

Canada's circular material use rate in 2020 was 6.1% (Council of Canadian Academies 2021), which is lower than the global average of 8.6% and well behind leaders like the Netherlands (30.6%) and Italy (20.8%)[3]. The circular material use rate was developed by Eurostat and is defined as the share of recycled materials in circulation in a country as a share of total material consumption. This measure of circularity is limited in its focus on recycling and does not consider other circular activities like reuse and repair. It nevertheless provides a comparable indicator based on currently available cross-country data.

Canada's current policy focus on Waste Management is typical of countries early in a circular journey. Waste Management policies focus not on how to prevent waste, but how to collect, recover and manage it. Compared to countries included in a global study carried out by UNIDO and Chatham House (Barrie et al. 2024)[4], Canada has a higher concentration of CE policies in Waste Management, Resource Management and Circular Infrastructure (See Figure 5 below). By contrast, Canada has a lower concentration in the following policy categories (by size of gap): Brokering, Fiscal Instruments, Research and Innovation, Business Support, Product Requirement and Producer Requirement.

This international policy comparison comes with caveats. The policies included in the UNIDO study are all national or federal roadmaps and do not include sub-national policies. By contrast, the Canadian assessment includes federal, provincial/territorial and municipal policies. This comparison, though imperfect, can be justified on the basis that Canada is geographically larger and more diverse than many of the countries included in the UNIDO study. Also, countries that are further along in their CE journey, such as the Netherlands, are likely to have more national or federal-level policies.

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[3] Eurostat data: https://ec.europa.eu/eurostat/databrowser/view/sdg_12_41/default/table. Metadata: https://ec.europa.eu/eurostat/cache/metadata/en/env_ac_cur_esms.htm

[4] The UNIDO and Chatham House report included 75 countries from Europe, Latin America, Africa, Oceania and Asia.

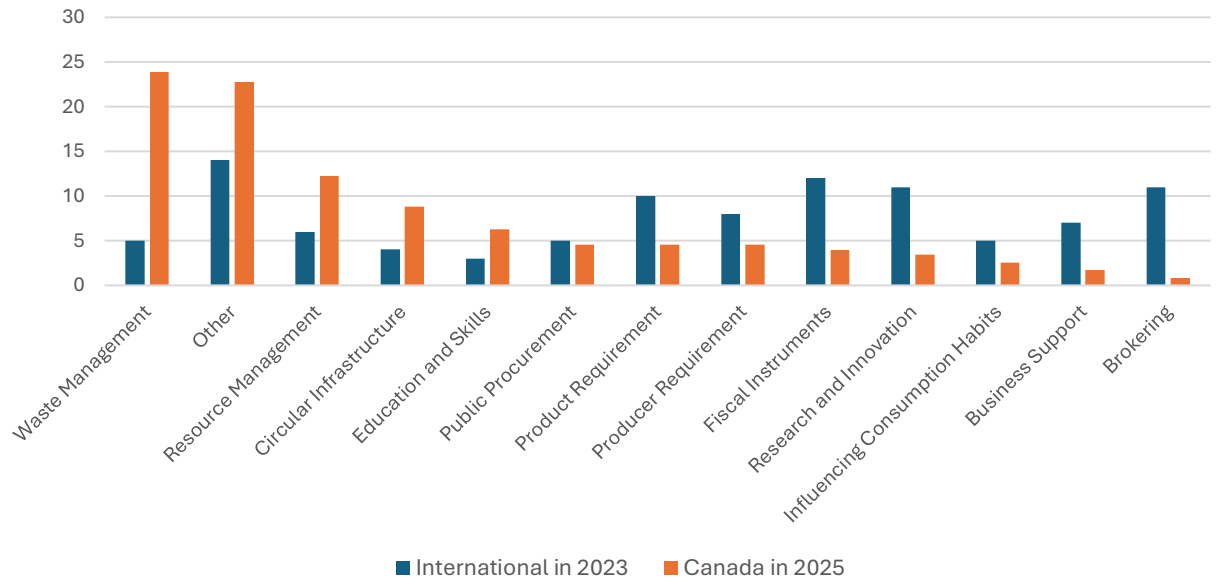

Figure 5: Share of total policies by category, Canada vs. international. International policy count is drawn from Barrie et al. (2024), Table 5. The "Other" category includes the remaining categories in the CE Policy Category coding framework listed in Table 1.

Even though the above international comparison is imperfect, it facilitates useful insights about possible future policy directions for Canada. Looking to the Netherlands, a country with a circular material use rate of 30.6%, provides a sense for possible next steps on Canada's CE policy journey. Initially focused on Waste Management, the Netherlands has since become a circular leader by introducing economy-wide targets, fiscal incentives and product and producer requirements. In 2017 it signed a "raw materials agreement" with municipalities, manufacturers, trade unions and environmental organisations to collaborate more closely on CE projects (Hedley 2023; Dutch Ministry of Infrastructure and Water Management, n.d.). The Netherlands aims to halve the use of primary raw materials by 2030 and run the economy entirely on recycled materials by 2050. In early 2023, it published a roadmap to 2030, specifying targets for product groups like furniture and textiles. The roadmap focuses on reducing the volume of materials used throughout the economy by enhancing efficiencies, substituting raw materials for bio-based and recycled ones, extending the lifetimes of products by making them easier to repair and recycling. It also aims to factor environmental damage into product prices and requires a certain percentage of second-hand materials in the manufacturing process.

One area where Canadian CE policy has relatively fewer policies is in Brokering, defined by UNIDO as knowledge transfer, via community hubs, platforms or databases (Barrie et al. 2024). The European Union's (EU) "Digital Product Passports," which have been required for all textiles, electronics and batteries sold in the EU since April 2025, represent a type of Brokering policy, and one that Canadian companies may be required to participate in when

trading with the EU. Digital Product Passports, introduced as part of the 2024 Ecodesign for Sustainable Products Regulation, require comprehensive information about each product's origin, materials, environmental impact and disposal recommendations. Combined with EPR regulation, Digital Product Passports make producers take responsibility for their products beyond point of sale, support recycling and repair of the product. They let regulators track ownership over the life cycle and empower customers to know what they are buying. It will be interesting to track how Digital Product Passports affect volume of materials diverted from landfill, the frequency of repair activity, the use of recovered materials and changes to design of products.

Municipal, provincial and federal governments play distinct roles in promoting circular approaches

Federal-level policies in Canada serve to establish roadmaps and to set national regulations and targets that can support greater engagement across jurisdictions. For instance, the Canadian Minerals and Metals Action Plan 2021 outlines targeted actions to position Canada as a global leader in sustainable mining, including recycling critical minerals and reducing mining waste. The 2024 federal *Right to Repair Act* (Bill C-244) amends the *Copyright Act*, jointly administered and implemented by Innovation, Science and Economic Development Canada and Canadian Heritage, to circumvent technological protection measures when maintaining or repairing a product.

The concentration of municipal policies in the CE policy inventory reflects the central role that cities play in implementing circular policies, as responsibilities for externalities related to solid waste management, congestion and some types of pollution lie at the municipal level. Examples of municipal CE policies include Vancouver's Demolition Waste and Deconstruction Bylaw, Markham's Textile Recycling Program Strategy and Montreal's strategic plan towards circularity (Montréal, zéro déchet 2020-2025).

Operating in a federal system like Canada can make policy alignment across jurisdictions challenging (Council of Canadian Academies 2021). The CE policy inventory helps to identify potential opportunities for policy harmonization. For example, even though solid waste management is prioritized across jurisdictions in Canada, there are discrepancies between provinces and municipalities in rules for waste collection, sorting, treatment and recycling. For example, Nova Scotia, Prince Edward Island and Ontario (as of January 2025) are the only three provinces that ban the landfilling of organic compostable materials. In British Columbia, there is no provincial landfill ban, but more than half of British Columbia residents are covered by such landfill bans at the municipal level. Other provinces do not have a landfill ban for organic compostable materials in place. These policy differences prevent attaining economies of scale in certain waste streams that

would justify domestic processing and therefore the retention of material value. They also contribute to confusion, increasing the likelihood of contamination in waste flows. Another promising area for policy harmonization is aligning public procurement requirements across jurisdictions, which would send strong signals to markets in support of circular goods and services. Provinces with the highest municipal solid waste disposal per capita[5]—Alberta, Newfoundland, Saskatchewan, Manitoba—have relatively few CE policies, suggesting opportunities for policy development.

Some efforts have been made to address the lack of policy harmonization. In 2009, the Canadian Council of Ministers of the Environment (CCME), an intergovernmental forum made up of the 14 federal, provincial and territorial environment ministers, developed the Canada-wide Action Plan (CAP) for EPR regulation. Extended Producer Responsibility regulation operates by the "polluter pays" principle, making producers financially or physically responsible for the collection and recycling of their end-of-life products. The goal of the CAP was to harmonize provincial EPR programs to increase diversion from landfills. The CCME developed guidance to support consistency in EPR policies. While there are still discrepancies in the design and coverage of EPR across provinces, all 10 provinces now have an EPR program for electronics and some provinces have EPR for other product types too (e.g. tires, paper and packaging, automotives). None of the territories have EPR for electronics, though the Yukon implemented EPR for other products in 2025.

Assessing the effectiveness of CE policies

As noted above, the Canadian CE policy inventory weights each policy equally, without considering effectiveness in achieving circular objectives, such as reduced waste, greater circulation of materials and less use of primary materials. Building in measures of policy effectiveness requires evidence on the causal effect of policies. Such evidence is scarce. Moreover, the outcomes that ought to be considered in measuring policy effectiveness are sector-specific, which complicates cross-sectoral comparisons. Building this evidence base is needed to support governments in designing and implementing an optimal CE policy mix and would support the development of policy effectiveness indicators in the CE policy inventory.

Potential complementarities between CE and climate policies

The CE policy inventory can help generate understanding about how circular and climate policies intersect, clash or form part of broader policy mixes.

Circular economy policies often complement climate objectives. The Ellen MacArthur Foundation estimates that 45% of global GHG emissions are associated with how we

[5] This measure is net of waste diverted from landfill via recycling or composting.

produce and consume, while 55% are associated with fossil fuels and could be addressed by switching to renewable energy sources (EMF 2019). This means that up to half of GHG emissions reductions could be achieved by adopting more circular approaches. For instance, the C2P2 Climate Policy Inventory developed by the University of Calgary includes waste-related policies that also address climate objectives. Examples include Canada's Food Waste Reduction Challenge that devotes $20 million to food waste reduction, while reducing upstream and downstream GHG emissions. At the provincial level, Quebec's household composting program aims to divert organic materials from landfill and in doing so, reduces households' GHG emissions.

However, CE policies go beyond climate objectives to address the transgression of other planetary boundaries like preservation of biodiversity, fresh water and pollution. Furthermore, CE and climate policies are not always complementary, particularly given the current GHG emissions reporting protocol. For example, the emissions attributable to the multiple use phases and more complex value chains associated with circular solutions, such as reuse, repair and remanufacturing, are not reflected accurately in the GHG emissions reporting protocol (EMF 2025). Firms creating more durable products are currently penalized because they must report greater Scope 3 use-phase emissions in the year of sale to account for the elongated lifetime of their products.

The CE and Climate policy inventories can be analyzed in tandem to identify where complementarities lie for amplified impact.

Conclusion

The Canadian CE policy inventory can be a tool to support greater policy harmonization, which can accelerate the shift towards circularity in Canada. To date, Canada has rightly prioritized policy development in sectors with high waste and high resource needs, including Construction and the Built environment, Mobility and Transport Systems, Food and Agriculture and Electronics. Canada currently has a strong policy focus on Waste Management and Resource Management. Going forward, policy development could focus on building the necessary ecosystems for circular business models to flourish, through data development and sharing, business support, fiscal instruments and research and development.

Future extensions of the CE policy inventory could address the limitations identified. For instance, developing Canada-specific indicators of effectiveness or stringency of CE policies would involve compiling evidence of policy impact on a sector-by-sector basis. Populating the inventory with retroactive policies would allow tracking policy trends over time. Finally, territorial and northern municipal policies are currently under-represented in

the inventory and could be better covered in a future iteration. Exploring how CE and climate policies intersect, clash and complement one another would be a fruitful area for future research using the CE and Climate policy inventories in tandem. Another promising area of research would be exploring the optimal sequencing of CE policies and scoping a CE policy trajectory.

The database with the full CE policy inventory is available for download here.

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