



Association canadienne  
des restaurateurs et  
des services alimentaires

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Canadian Restaurant  
and Foodservices  
Association

October 22, 2012

**VIA E-MAIL**

Ms. Kate Kusiak  
Public Consultation Unit  
City of Toronto  
19<sup>th</sup> Floor, 55 John Street  
Toronto, Ontario  
M5V 3C6

Dear Ms. Kusiak:

I am writing on behalf of the Canadian Restaurant and Foodservices Association (CRFA) to express our concerns about the planned ban on single-use plastic bags.

Canada's \$63-billion restaurant industry employs more than one-million people, and serves more than 18-million Canadians daily. Toronto's more than 8,000 restaurants are a diverse economic engine for the city. CRFA is very concerned that a decision of this magnitude was made, and passed, at City Council before any consultation was undertaken with industry. While CRFA appreciates having the opportunity to comment, because the ban has already been passed the focus of this letter is to comment specifically on the implementation, communication, and enforcement aspects of the new regulation.

CRFA recommends that the City take into account that many business owners place orders for branded plastic bags several months ahead of their intended use. As a result, the proposed regulatory changes must be phased in over a reasonable time period. Otherwise, business owners could be in possession of expensive marketing material that is of no use and will needlessly be disposed of.

In addition, CRFA and its members are also concerned with the manner in which the City will communicate the introduction of the ban to consumers. During the introduction of the 5¢ plastic bag fee, signage and education material was provided by the City to business owners to communicate that it was a city, not individual business, initiative. Banning plastic bags will cause some consumers to be annoyed and inconvenienced. CRFA recommends that the City works with business owners to ensure that this material is provided in a timely manner, in a variety of formats and languages.

Enforcement of the by-law is also a concern for our members and CRFA recommends that the City of Toronto takes an educational approach to enforcement and not a punitive one. Banning single use plastic bags may cause confusion and in a City as diverse as Toronto there are certain to be language and cultural challenges to implementing this ban. CRFA recommends that the City of Toronto develop a clear communication plan prior to the introduction of a total ban.

Thank you for providing an opportunity for CRFA to comment. If you have any questions or concerns, please do not hesitate to contact me.

Sincerely,

Douglas McCallum  
Environment and Sustainability Manager