



October 23, 2012

Ms. Kate Kusiak  
Sr. Public Consultation Coordinator  
Public Consultation Unit  
City of Toronto  
Email: [kkusiak@toronto.ca](mailto:kkusiak@toronto.ca)

Dear Ms. Kusiak,

**Re: Plastic Bag Ban Consultation – Why the ban is unnecessary**

Please accept our submission following our participation in the plastic bag ban consultations. As stated at the morning and afternoon sessions and by email from me on Oct 16, 2012, we are skeptical about the consultations that were held by the City, which we feel will be used to legitimize a decision which was already made on June 6, 2012 to ban single-use plastic carryout shopping (SPCS) bags.

The facts and scientific studies about bags are contained in greater detail on the website <http://www.allaboutbags.ca>. Our comments focus on why there should not be a ban on SPCS bags. There is no municipal need for the ban on SPCS bags based on the following information, some of which was stated at the consultations.

Are SPCS bags a landfill problem in Toronto?	NO – SPCS bags are less than 0.6% of all solid waste
Are SPCS bags a litter problem in Toronto?	NO – Toronto's 2006 Litter Report stated SPCS bags were 0.13% of all litter
Will a ban eliminate the use of SPCS bags for waste?	NO – SPCS bags are a necessity for organics and waste and recent polls indicate 76% of Torontonians will have to buy heavier plastic kitchen catchers if there is a ban
Will a ban reduce the amount of SPCS bag waste in the waste stream particularly if the alternative is paper?	NO – Plastic kitchen catchers have up to 76% more plastic and paper bags weigh 55 grams vs. SPCS bags at 8 grams
Did the city consult with experts or do studies on a ban of SPCS bags?	NO – Governments such as the UK/Scotland studied this issue for almost two years to conclude education and 3R's (reduce, reuse, recycle) approach have the best results – fees and bans have many disbenefits concluded their Environment Minister
Did the city consult with residents and industry on a ban of SPCS bags?	NO
Has the city looked at the science of a ban on SPCS bags?	NO
Has the city examined the intended and unintended consequences of a SPCS bag ban, such as more waste to	NO

landfill, more trucks to collect waste and more greenhouse gas emissions?	
Has the city looked at the job losses caused by a SPCS ban?	NO
Will a switch to paper bags cost the city more money?	YES – we estimate it will cost the city \$700,000 to manage paper bags vs. \$100,000 for SPCS bags
Is organics collection based on the SPCS bag?	YES
Are 44% of SPCS bags reused for organics recycling?	YES
Does the City divert over 100,000 tonnes of organics using the SPCS bag?	YES
Are 41% of SPCS bags reused for household waste?	YES
Does the use of SPCS bags for waste eliminate the purchase of heavier plastic kitchen catchers that contain up to 76% more plastic?	YES
Are SPCS bags recycled in the blue bin?	YES
Are the SPCS bags recycled locally?	YES
Are SPCS bags remanufactured locally creating green jobs?	YES
Do over 1 million Torontonians living in high rises need the SPCS bag?	YES
Will a ban on SPCS bags reduce participation in organics collection?	YES
Has SPCS bag usage been reduced by 53%?	YES – These are Toronto estimates but Retail Council of Canada estimates it is closer to 70% in City of Toronto
Do retailers still charge for SPCS bags?	YES
Have Torontonians adopted reusable bags?	YES – over 58% have adopted reusable bags
Do retailers offer for sale and promote reusable bags?	YES
Do retailers offer in-store SPCS bag recycling?	YES
Do retailers employ “Do you need a SPCS bag” programs?	YES – This education program has helped reduce SPCS bag use and has educated consumers on responsible use of SPCS bags.
Do retailers employ best bagging practices?	YES – SPCS bags are not double bagged and their full volume is fully utilized.
Do stewards pay the city fees to recycle bags?	YES
Do stewards help pay for Toronto’s blue bin recycling program?	YES
Will a switch to paper increase greenhouse gas emissions?	YES – Paper bags generate 3.3 times more greenhouse gases in the manufacturing process than SPCS bags
Will a switch to paper mean more waste management/garbage/recycling trucks on the road?	YES - The city will have to expand the trucks collecting waste from 145 trucks for plastic to 1,183 for paper bags
Will a switch to paper mean more trucks required to deliver bags?	YES – 7 times more trucks will be needed, according to bag manufacturers.
Will a switch to paper bags hurt small retailers and consumers because they cost more?	YES – Paper bags will cost small retailers and consumers up to 5 times more than SPCS bags
Will a switch to paper mean more trees will be cut?	YES – Kraft paper is a resource intensive industry and the strength of the bag requires virgin material to hold purchases
Is the City’s ban promoting single use versus reuse by moving citizens to single use kitchen catchers?	YES – The SPCS bag is reused for other purposes such as organics & waste collection, pets and other

	reuses.
<b>Will the SPCS bag ban hurt Toronto retailers and small business by causing citizens to shop outside of Toronto, including cross-border shopping?</b>	<b>YES</b> – The ban provides citizens another incentive to find favourable shopping experiences in neighbouring communities and across the border, where they have a choice and the SPCS bag ban will not apply.
<b>Will the SPCS bag ban hurt convenience store owners and other retailers?</b>	<b>YES</b> – If SPCS bags are not available for impulse purchases, upon which these and other businesses depend, convenience stores & other retailers' will lose business.
<b>Are reusable bags are recyclable in Canada?</b>	<b>No</b> – At the end of their life, they will end up in Toronto's landfill, adding more waste to the solid waste stream.

The ban on SPCS bags will result in the needless loss of over 10,000 jobs for no environmental or economic benefit. In partnership with retailers and industry, Toronto has implemented an excellent system to manage SPCS bags, which utilizes the 3R's and stewardship principles that respect the 3R's. This system has reduced bag use by over 70%; 58% of Torontonians have adopted reusable bags and over 80% of SPCS bags are reused for organics and household waste. In addition, citizens can recycle their SPCS bags in their blue bins or through in-store recycling.

The facts are clear - there is no municipal need for a ban.

Sincerely,



Marion Axmith, CAE  
Director General