

Appendix 2: Stakeholder Comments from February 28, 2013 and March 27, 2013 Consultation Meetings

Summary of stakeholder comments on the benefits and implications of options to reduce use and disposal of plastic bags in Toronto.

Option 1: City takes no further action

Description:

City of Toronto does not mandate a fee or ban related to retailers providing customers with a plastic shopping carry-out bag and leaves it up to retailers to charge a fee or not for provision of these bags.

Toronto Municipal Code Chapter 604 prohibits retailers from offering plastic bags that are not compatible with the City's Blue Bin recycling program.

Benefits:

- Customers retain the choice to select their preferred carry-out bag and will not incur additional cost to purchase plastic shopping carry-out bags (Toronto Taxpayers Association).
- Plastic bags can be reused for other purposes such as to line their kitchen catcher. Residents do not need to purchase separate plastic bags off the store shelves (i.e. garbage bin liners or kitchen catcher liners) (Canadian Plastics Industry Association).
- No mandated ban or fee allows small family run stores to conduct their business on equal or level playing fields with all other businesses (Ontario Convenience Store Association).
- There is no job loss in the plastic bag manufacturing industry associated with this option (Hymopack).
- Free distribution of plastic bags does not require residents to purchase store shelf bags to line their kitchen catcher, making it convenient for single-family and multi-unit residents to participate in the Green Bin Program (Canadian Plastics Industry Association).
- This option uses less plastic because residents do not need to buy special purpose bags to line waste bins or kitchen catchers, which are typically thicker than traditional plastic carry-out shopping bags (Hymopack).

Implications:

- This option is the least likely to result in reduction of plastic bags (Sierra Club Canada)

Comments on Variations to Option 1:

Education campaign to reduce plastic shopping carry-out bags:

- A one-time message may not be adequate in changing behaviour. Sustained messaging may be necessary. Education is a constant cost to municipalities (Recycling Council of Ontario).
- City should be spending more on education (Sierra Club Canada).
- Government should partner with retailers to discuss ideas for reduction, deposit/return, and incentives to reduce bags (Toronto Taxpayers Association).

Recycle plastic bags removed from the Green Bin Program:

- Recycling the plastic bags captured from the Green Bin Program will not meet the goal in reducing the use and disposal of plastic bags (Sierra Club Canada).

Retailers voluntarily charge a fee for each plastic shopping bag:

- Some large retailers (large format grocery stores) continue to charge for bags, without government intervention (Retail Council of Canada).
- Voluntarily charging a fee in a competitive retail industry will result in decline in sales from loss of sales to competitors that do not charge a fee (Toronto Association of Business Improvement Areas).
- Retailers may choose not to charge a fee and will use any opportunity to compensate for decline in sales/revenue from loss of consumers to online retailers and cross-border shopping (Retail Council of Canada).
- It is harder for small or “front of line” retailers to charge a fee because they will experience push back (Toronto Association of Business Improvement Areas).
- Small retailers feel that the voluntary fee is unfair and puts them at an economic disadvantage and cannot compete against large retailers (Toronto Association of Business Improvement Areas).
- Voluntary charge may cause certain people to shop elsewhere because it will impact their budget (Toronto Taxpayers Association).
- Voluntary fee will not help reach reduction goal. Bags provided for free does not prevent excess usage of bags (Sierra Club Canada).

Option 2: Mandated Plastic Bag Fee

Description:

Retailers must charge a fee for each plastic shopping carry-out bag provided to customers (Implemented by municipal by-law)

Benefits:

- 90% of Torontonians changed behaviour (decreased use) in response to the mandated fee (Recycling Council of Ontario citing research conducted by Stewardship Ontario, Sept 2010).
- Stewardship Ontario study (September 2010) showed 43% of those surveyed felt that the by-law has a worthwhile impact on reduction of plastic bags. Only 25% of the surveyed were unhappy about the by-law. (Cited by Recycling Council of Ontario).
- Some large retailers reinvested a portion of collected funds into community or environmental initiatives (Retail Council of Canada).
- Customers are reminded of their environmental impact each time at checkout when they are asked if they would like to purchase a bag. This is an opportunity to educate residents at the point of sale. Customers should ask to purchase a bag (Citizens for a Safe Environment).
- 58% have switched to reusable bags (Telephone survey of 110 Toronto residents conducted in July 2011 by Silverhill Institute of Environmental Research and Conservation).
- Reduces excess bags because there is a charge for each bag that is distributed (Sierra Club Canada).

Implications:

- There is a negative public perception associated with bag fees collected as additional revenue for retailers (Retail Council of Canada and Toronto Association of Business Improvement Areas).
- There are health implications with improper care and use of reusable bags (Silverhill Institute of Environmental Research and Conservation).
- The fee implies to charge for a convenience item, this sets a precedent to “tax” for other convenience items (Toronto Taxpayers Association).
- Potential net job loss for producers of plastic shopping carry-out bags (Hymopack).

- Residents may switch to an alternative carryout bag that has a greater environmental burden. Reusable bags are not recyclable and disposed in landfill. One life cycle analysis study conducted by the UK Environmental Agency (2011) found that a plastic polypropylene reusable bag has the lowest environmental impact if reused at least 11 times to match the environmental performance of a one-time used plastic bag. However, plastic bags are reused for other purposes (Canadian Plastics Industry Association).
- It is not possible for the City to consistently monitor and enforce compliance. Despite having a by-law in place, some small retailers did not charge for bags and/or did not list the charge in the receipt tape (Toronto Association of Business Improvement Areas).
- Charging a fee impacts consumer and retailer relationships (Retail Council of Canada, Toronto Association of Business Improvement Areas).
- Small retailers experience push back from customers and are at risk of losing the sale (Toronto Association of Business Improvement Areas). Small retailers are often pressured for a 'discount' and waiving the fee would be partial way to satisfy the demand (Toronto Association of Business Improvement Areas).
- Large retailers will feel compelled to not charge for a bag if the customer makes an expensive purchase (Retail Council of Canada).

Comments on Variations to Option 2:

Retailers provide limited number of plastic shopping carry-out bags for free and charge a fee for each additional bag:

- Customer will attempt to fill the free bag with as much purchases as possible, potentially causing the bag to rip (Retail Council of Canada).
- Difficult to track, monitor and enforce this option (Toronto Association of Business Improvement Areas).
- Further refine this concept to allow retailers to provide first bag free with a 2 item purchase minimum and charge for each additional bag (Sierra Club Canada).

Retailers must charge a fee for each plastic shopping carry-out bag or paper carry-out bag provided to customers.

- Paper and Paperboard Packaging Environmental Council is opposed to bans and fees on paper materials and feels this unfairly penalizes products that are made from renewable resources, energy, often high in recycled content, and are widely recyclable and compostable.

Option 3: Mandated Plastic Bag Ban

Description:

Retailers are prohibited from distributing plastic shopping carry-out bags. Alternatives such as paper or reusable bags can be provided by the retailer for free or for a charge.

Benefits:

- Switch from plastic to paper bags could have positive economic impact on paper bag industry (Toronto Environmental Alliance).
- Ban will see higher reduction results than voluntary programs or mandated fee (Recycling Council of Ontario and Sierra Club Canada).
- Strongly promotes environmental behavioural change. Customers are reminded of their environmental impact each time at checkout (Citizens for a Safe Environment).

Implications:

- There is an additional cost to residents to purchase needed bags for other purposes such as lining waste bins (Canadian Plastics Industry Association) and will impact low-income households the hardest (Toronto Taxpayer Association).
- Reusable and paper bags cost more to retailers to purchase (Retail Council of Canada, Toronto Association of Business Improvement Areas). Alternative paper carryout bags cost 3 times more than plastic bags (Hymopack).
- Purchasing reusable bags or plastic bags for the garbage bin or kitchen catcher is an added cost to residents, affecting low income households (Toronto Taxpayers Association).
- There are health implications with improper care and use of reusable bags (Silverhill Institute of Environmental Research and Conservation).
- A ban would strain retailer and customer relationship. It is harder for small or “front of line” retailers to not provide a plastic bag because they will encounter strong resistance from customers (Toronto Association of Business Improvement Areas).
- 47% of convenience store shoppers in Toronto would limit their purchases and alter buying habits as a result of a ban (Ontario Convenience Store Association, citing Leger Analytics survey, November 2012).
- There are other uses for plastic bags such as lining garbage bins or kitchen catchers. 76% of Ontario residents indicated that they would purchase waste bin liner bags if there was a ban (Canadian Plastics Industry Association, citing Decima study, 2007).

- Theft is an issue. Customers bring reusable bags into the store and could take an item without the store clerk's knowledge. Theft prevention would require additional staff at exits to compare purchases with the receipt (Retail Council of Canada and Toronto Association of Business Improvement Areas).
- Customers may find ban on plastic bags inconvenient for making impromptu purchases. Retailers may experience decrease in sales from decline in impromptu purchases (Toronto Association of Business Improvement Areas).
- Retailers near Toronto's borders will experience decreased revenues from cross boundary movement of consumers (Canadian Plastics Bags Association).
- Ban of plastic bags negatively impacts Canadian plastics industry with loss of jobs (Canadian Plastics Industry Association and Hymopack).
- Paper bags hold fewer purchases than plastic bags, resulting in higher usage of paper bags and consumption of resources to manufacture the paper bags (Hymopack).
- Greater instances of people purchasing heavier plastic bags to line garbage bins or kitchen catchers. Kitchen catcher liner bags can contain up to 76% more plastic (Canadian Plastics Industry Association).
- Retailers will feel economic implications as a result of a mandated ban, such as costs of purchasing paper bags, depletion of existing stock of plastic bags and transporting prohibited bags to retail locations outside of Toronto, reconfiguring checkout points, and training staff (Retail Council of Canada and Toronto Association of Business Improvement Areas).
- Enforcing the by-law at small retailers would be extremely difficult (Toronto Association of Business Improvement Areas).
- Communicating by-law information to retailers is challenging as the retailer mailing list provided by the Province is not fully accurate. A one-time communication and education campaign is inadequate; it will require sustained communication to educate retailers and public (Toronto Association of Business Improvement Areas).

Comments on Variations to Option 3:

Exempt small retailers (defined by square footage of retailer property or revenues:

- No comments received.

Phase-in a ban that applies only to large retailers in phase 1 and extended to all retailers in phase 2:

- No comments received

Retailers are prohibited from distributing plastic shopping carry-out bags and must charge a fee for each paper bag:

- Paper and Paperboard Packaging Environmental Council is opposed to bans and fees on paper materials and feels this unfairly penalizes products that are made from renewable resources, energy, often high in recycled content, and are widely recyclable and compostable.