



February 25, 2013

Mr. John Livey,
Deputy City Manager &
Ms. Kate Kusiak,
Senior Public Consultation Coordinator
City of Toronto
Policy, Planning, Finance & Administration
Metro Hall, 19th Floor
Toronto, Ontario M5V 3C6

By e-mail: jlivey@toronto.ca & kkusiak@toronto.ca

Dear Mr. Livey and Ms. Kusiak,

RE: City of Toronto Stakeholder Consultation Process on Plastic Bags

The Canadian Plastics Industry Association (CPIA) and the Canadian Plastic Bag Association (CPBA) welcome a Stakeholder Consultation process by the City of Toronto on the benefits and implications of a range of measures to reduce the use and disposal of plastic bags in Toronto. It is our understanding that this consultation, with subject-matter experts, will help to inform the policy report being developed for the June, 2013 meeting of the Public Works and Infrastructure (PWI) Committee.

On behalf of the industry and its many partners, CPIA and CPBA will be participating in and watching closely this Stakeholder Consultation to ensure that it is a legitimate policy development process based on the principles of fairness, balance, impartiality and comprehensiveness. The process must ensure that Report to the PWI Committee takes an objective policy focus, not a subjective focus based on opinion. It must examine “all” the options related to the reduction and disposal of “all” types of bags including plastic bag alternatives; such as, paper and all types of reusables.

In the wake of the most recent council debate and vote on plastic shopping bags, which saw the bag ban by-law reversed by an overwhelming majority, as well as the follow-up legal discussions with plaintiffs, there is an expectation that any stakeholder consultation process by City Staff will be policy-based; objective in its analysis and content using all the policy development tools available including; third party and city-audited data, city-initiated research, independent studies, reviews of research and a consistent set of metrics to evaluate each option. This should also include City and private sector

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programs that already facilitate reduction and diversion; all of which should be shared with those participating in the consultation.

We also expect a free-flow of pertinent information in keeping with a transparent process that intimately affects the lives and future of our members. To this end, a number of industry partners, including CPIA and CPBA, have serious concerns regarding the discussion outline containing “*Options to Reduce the Use and Disposal of Plastic Bags in Toronto*”, distributed by City Staff on February 13, 2013. The discussion outline is incomplete and has serious and grave omissions that could bias a Report prepared by City Staff for PWI. The most serious omission is the lack of diversion or reduction targets, which are a critical and fundamental building block leading to strategy decisions on bag management. They should be the starting point for any policy discussions and the Report that will be sent to the PWI Committee.

The discussion outline omits any discussion of reuse and recycling as options. These two R’s are standard, legitimate reduction and diversion waste management strategies used by municipalities across Canada. This omission reinforces the impression of a forgone policy conclusion which favours a fee or ban.

It is also both puzzling and misleading that the option entitled: “*Status Quo – Take No Action*” – states that “the City does not adopt **any** measures to reduce the use and disposal of plastic bags”. This statement leaves the impression that the City and private sector have done nothing on bag reduction and diversion to date, when the opposite is true. The City has been very successful in reducing bag usage by 53% and encouraging adoption of reusable bags by 58% of Torontonians.

We look forward to the upcoming stakeholder discussion this week and to working with the City of Toronto in the coming months to ensure a policy development process that is objective and comprehensive.

Yours truly,



Marion E. Axmith, CAE
Director General, Issues

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Cc Mr. Christopher J. Williams, Partner, Aird & Berlis, LLP
Mayor’s Office – Mr. Earl Provost, City of Toronto
Mr. Joseph Pennachetti, City Manager, City of Toronto
Ms. Carol Moore, Executive Director, City of Toronto Policy, Planning, Finance & Administration Dept.
Mr. Jim Harnum, General Manager, Solid Waste Management Services, City of Toronto
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