## **Bag Ban/fee Consultations**

February 28<sup>th</sup> 2013

#### 1. What are the benefits and challenges to implementing each of the options?

## A) Option 1: Status Quo

The benefits to Option 1 are numerous. Let's consider a few facts.

- plastic shopping bags make up less than 1% of landfill volume.
- plastic shopping bags make up less than 0.5% of litter.
- "kitchen catcher" bags are thicker and take much longer to decompose than grocery bags.

These facts are indisputable. They are the facts.

The status quo is the perfect solution. Retailers who wish to charge for shopping bags are free to do so. Consumers who don't want to pay for shopping bags are free to shop elsewhere. Retailers who do charge are free to decide what to do with the proceeds - keep them or donate them to charity and receive a generous tax receipt.

### B) Option 2: Plastic Bag Fee

The plastic bag fee was brought forth as part of Target70 - a plan to achieve 70% waste diversion.

But plastic bags only take up 1% of landfill. The plastic bag fee bylaw was a farce of a solution to a problem that didn't exist. Plastic shopping bags are recyclable in the City of Toronto. The rules regarding Toronto's recycling program are complex. If there is a problem with a recyclable material ending up in landfill, the solution is through education, not through banning.

But I question the very existence of that problem. Plastic bags take up less than 1% of landfill volume. That sounds like a great accomplishment! That sounds like any perceived problem has been manufactured, and the proposed solution to this non-existent problem will hurt manufacturers.

Here is another indisputable fact. 93% of plastic bags in Toronto are reused and recycled. When we reuse and recycle, we reduce the need for manufacturing new bags. I'm sure you're all familiar with the sustainability cycle "Reduce, Reuse, Recycle". When it comes to plastic bags, this cycle is apparently already at 93% efficiency. We are so far past the 70% target that it's almost insulting to everyone involved to spend so much time debating this issue, trying to get the final 7% of the 1% that plastic bags represent.

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Again. Plastic bags take up less than 1% of landfill volume. 93% of them are reused and recycled. There is no problem.

## C) Option 3: Plastic Bag Ban

The plastic bag ban is another pseudo-solution to a fake problem. Let's assume we ban plastic shopping bags. How are you going to alter your life to accommodate the new rules? Are you going to carry your waste to the landfill in your pockets? How will you dispose of pet waste - will you hold it in your hands until you come across a suitable place to leave it? No. You're going to purchase plastic kitchen catcher bags. These bags are thicker than plastic shopping bags. These bags take longer to decompose.

And what's the result of this? Environmentally, the result is landfill volume remains the same but the rate of decomposition slows down considerably. Economically, this is an added expense on the taxpayer. This is going to hit the lowest earners in our society - the poor - the hardest. Seniors on a fixed income will be hit hardest. The working poor will be hit hardest. Families on Ontario Works will be hit hardest. Newcomers to Canada looking for a fresh start and a chance at prosperity will be hit the hardest.

And because landfill volume doesn't change but the rate of decomposition goes down, the environment will be hit the hardest. Because the deforestation required to provide paper shopping bags to Canada's biggest economy will devastate rural Canada, the environment will be hit the hardest.

2. Which of the 3 options best achieves balance between City of Toronto, residents, retailers' and bag manufacturers' interests?

"Option 1: Status Quo- Take No Action" is the option that best balances the needs and interests of Toronto's residents, retailers, and bag manufacturers. Take a look at who has voiced their opinion on this.

- The residents are represented by us, the Toronto Taxpayers Coalition;
- The retailers are represented by the Ontario Convenience Store Location; and
- The bag manufacturers are represented by the Canadian Plastic Bag Association.

These three groups represent the interests of residents, retailers, and manufacturers. We're unanimous in our opinions on this. The best way to balance these interests is with the status quo.

While I can only speak for Toronto Taxpayers Coalition, indeed each our organizations also takes into consideration the environmental impacts of each option. It is out of concern for providing sustainable environmental policies that we support the status quo.

#### 3. Which option would have the greatest impact on reducing plastic bags?

None of the options before us would have any impact on reducing plastic bags. We've achieved a 93% rate of reusing and recycling. This is in excess of the 70% target set by Target70.

Plastic bags take up less than 1% of landfill volume.

Trying to reduce landfill volume by 70% of 2007 levels is a laudable goal. But you aren't going to get there by taxing or banning a product that already takes up less than 1% of landfill. The math is clear. It can't be done.

If you want to reduce landfill volume, you need to go after the largest sources of landfill volume, not the smallest.

I yearn for a day when politicians really cared about the environment. I yearn for a day when environmental groups really cared about the environment. Environmental groups used to make a big difference through real accomplishments. When today's mainstream environmental lobby takes on symbolic battles like this instead of legitimate battles that should be fought, it's an insult to organizations that really care about the environment, landfill diversion, and sustainability.

I don't want to suggest that the environmental lobby is being paid to take a position that will not reduce landfill volume whatsoever,

I don't want to suggest the environmental lobby is being paid by someone to take a position that does nothing to reduce waste, but that position seems to run counter to their mandate. It's confusing to the public"

The Silverhill Institute of Environmental Research and Conservation put it best in their July 2009 report:

"The city of Toronto has imposed a tax that has virtually no public benefit. The tax demonstrates political grandstanding grounded in environmental rhetoric. This bag tax program appears to be as much about creating political capital using the rhetoric of "sustainability" and "the environment" than it does about meeting environmental objectives. It seems to be more important to look "green" than to actual institute policies with real environmental benefits."

#### 4. Which of the 3 options do you prefer and why?

The status quo is the perfect solution. Retailers who wish to charge for shopping bags are free to do so. Consumers who don't want to pay for shopping bags are free to shop elsewhere. Retailers who do charge are free to decide what to do with the proceeds - keep them or donate them to charity and receive a generous tax receipt.

The other options presented - a bag fee and a bag ban - will do nothing to reduce landfill volume. But they will hurt the economy.

We've estimated the economic cost to Toronto taxpayers paying 5 cents per bag is between \$10-million and \$20-million annually. The Silverhill Institute of Environmental Research and Conservation puts this as high as \$44 million. The economic cost of a ban - which forces residents to pay even MORE for kitchen catchers, is significantly higher.

# 5. With the goal to reduce plastic bags, are they any other options that the City of Toronto should consider?

Plastic bags are not by any means a significant source of landfill volume, at less than 1%. But if the city is dead set on reducing this figure even further, a number of ideas should be considered that can have much more positive environmental and economic impacts.

We've explained why two of the options presented should not be pursued, so we have two ideas for options that should be pursued to achieve this goal.

An educational campaign should be considered. It's easier to go after the 7% of bags that are not reused or recycled than it is to go after the less than 1% of bags that make it to landfill. An educational campaign will come with a cost, but the cost is significantly less than the economic cost of either a tax or a ban.

The City of Toronto most likely has a partnership with Canada Post for bulk mail delivery. With the spring being Canada Posts slowest time of the year for bulk mail, they currently have a sale on bulk mail delivery at a less than a quarter of the cost of standard prices. Should the city pursue an educational campaign and utilize bulk mailer, we just ask that you use recycled material.

Secondly, The City of Toronto could further encourage retailers to participate in grocery bag return programs. This encouragement could come in the form of a tax incentive, or something symbolic like a "green award" for the largest diversion in specific areas, such as ward boundaries, or across the city.