



March 26, 2013

Mr. Jim Harnum  
General Manager, Solid Waste  
Management Services  
City of Toronto  
City Hall  
100 Queen Street  
Toronto, ON

By e-mail: [jharnum@toronto.ca](mailto:jharnum@toronto.ca)

Dear Mr. Harnum:

**RE: Setting the Record Straight on Feb. 28 Consultation Session PowerPoint**

Thank you for meeting with CPIA and the CPBA last week to discuss our concerns about the bag consultation process. We fully concur with your department's plans to produce a fair and balanced report to the City's Public Works & Infrastructure Committee (PW&I) based on fact, not opinion. Our offer stands to work with your staff and you to ensure that the City has the facts, data and all available global information on this topic.

As promised during our meeting, this letter requests that the City correct errors & omissions in the Feb. 28<sup>th</sup> PowerPoint used in the consultation session or remove it from the website. Without the correction of errors and the addition of the following information, the PowerPoint presentation will continue to misinform those accessing the City's web site and bias the consultation process.

This letter brings our concerns to your attention and sets the record straight on some of the major inaccuracies, omissions and biases contained in the Feb. 28 Consultation PowerPoint. Our comments here are not exhaustive, but do highlight our major concerns. As mentioned to you, we continue to be concerned that the options are not comprehensive, focus only on the first R – Reduction, and ignore reuse and recycling as legitimate strategies to reduce bag usage and divert bags from landfill. The industry option (attached) which was presented to you last Friday attempts to correct that serious lapse.

***Setting the Record Straight***

The following needs to be corrected in the PowerPoint to ensure an open and fair process. Our focus is on slides that supposedly describe the environmental landscape and economic impacts of bag policy.

***Errors and Missing Statistics***

As mentioned in our letters of February 25 and March 6, any policy document must be based on fact, not opinion. There are a number of facts and statements that are incorrect or are simply missing.

**1. *Missing Data on the Magnitude of the Bag Problem in the SWM Stream***

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Any policy paper should first identify the magnitude of the bag problem because this will guide the kinds of strategies that will be effective to achieve further reduction gains. ***This should be the starting point for and focus of any policy discussion.***

***The non-treatment of % of bags in the waste stream is a serious omission.*** Bags at less than 0.2% of the waste stream are not a serious Solid Waste Management (SWM) problem in Toronto nor are they a large component of landfill. Previous waste management audits have continuously shown bags to be less than 1% of the waste stream. Councilors need to be informed that the bags are a miniscule part of the waste stream.

**2. The impact of this 0.2% on go forward strategies is significant. Should the goal be to reduce material going to landfill or try to achieve further reductions at point of sale/checkout?**

Reduction on disposal will have much greater impact. If the goal is to reduce disposal - the number of bags going to landfill, we as an industry believe that serious gains can be made with aggressive 3R diversion strategies for green bin bags, clean used bags in the grey bin, and more bags being recycled in the blue bin – keep bags out of landfill using all 3 R’s.

However, if the reduction focus is at store, then the effectiveness of efforts to achieve further reductions is very limited because 80% of the bags are reused to manage household waste, including organics, and 15% of all bags are recycled. This kind of strategic focus will also have serious intended negative consequences/impacts on residents, retailers, local manufacturers, the local economy and the City’s SWM system. The industry based on international experience can make a strong case that alternatives to plastic bags will in fact add tonnage to the City’s waste stream, have serious environmental impacts and cost the City more money to manage in the longer term.

**3. Missing Statistics**

In addition to the above missing statistics on % of the waste stream, the PowerPoint NEEDS to include the following to ensure fairness and balance.

<i>Toronto Litter Audit Data</i>	<b>UNITS</b>			
<b>City of Toronto</b>	<b>2004</b>	<b>5,243</b>	<b>11</b>	<b>0.2%</b>
<b>City of Toronto</b>	<b>2006</b>	<b>4,341</b>	<b>6</b>	<b>0.13%</b>
<b>City of Toronto</b>	<b>2012</b>	<b>3432.5</b>	<b>29</b>	<b>0.8%</b>

***On Green Bin Organics Diversion #'s – 110,000 mt/year***

The use of plastic bags to drive green bin participation by removing the “yuk” factor is important. The bags are used to help divert 110,000 mt/yr of organics from landfill. What is the impact of a loss of plastic bags on green bin participation? **Research by the City in this area is critical to maintaining participation and diverting more organics from landfill, especially in Toronto’s growing high rise and multi-residential housing stock.**

**4. Inaccurate/Wrong Statements**

“Litter audits done on and adjacent to sidewalks show that plastic bags make up a small fraction of litter by **weight**.” Litter audits are done by item, not weight. Plastic bags are a small fraction of litter by units per the audit.

The City’s interpretation of the UK Government 2011 study on bags: “UK study concluded a plastic polypropylene (PP) reusable bag has lowest environmental impact if reused at least 11 times.” is incorrect. The report does **NOT** find this. It finds that **a reusable PP bag would have to be reused 11 times to match the environmental performance of the conventional plastic shopping bag used just once.** The Toronto PowerPoint statement is also out of context with the overall conclusions of the study on the use and management of bags. (See the chart below lifted from the actual UK study.)

**Amount of Primary Use Required for Reusable Bags to Match Environmental Performance of Conventional Plastic Shopping Bag\***

Type of Carrier Bag	HDPE Bag (No Secondary ReUse)	HDPE Bag (40.3% reused as kitchen catchers)	HDPE Bag (100% reused as kitchen catchers)	HDPE Bag (reused 3 times)
Plastic Bag	1	2	2	3
LDPE Bag	4	5	9	12
Non-woven PP Bag	11	14	26	33
Cotton Bag	131	173	327	393

The PowerPoint states: “No clear winner when comparing plastic to paper”. Please provide your source for this statement, since it is contrary to established science and LCAs on bags. The preponderance of studies including those from the Scottish and UK governments clearly show that plastic is the preferred environmental option. The UK study cited earlier by staff found that a paper bag emits four times more carbon dioxide than a plastic bag, for example. So to make up for choosing paper over plastic, you would have to reuse your paper bags at least three times (UK study assumed there was no paper bag reuse – no evidence p. 21) to match the use of plastic bag used just once.

**5. Serious Omissions**

***Impact of Bag Policy Decisions on High Rise/Multi-Residential Dwellings***

The go forward strategy must not just consider today, but tomorrow and how the housing landscape of Toronto is changing. Currently 50% of Toronto’s housing stock is not single-family dwellings and that percentage is growing. A policy that affects over one million Torontonians should be examined in terms of its impact. The current policy direction does not acknowledge issues related to multi-residential dwellings and the necessity of bags to move household waste from single units down to street level so that they can be managed, nor is it futuristic in its focus.

***Private Sector Stewardship Efforts***

We were disappointed that there is no attempt in the PowerPoint to recognize that retailer initiatives have led to a 58% adoption rate for reusable bags by residents or that they undertake checkout public education programs on responsible bag use. These are voluntary initiatives and they work very effectively. The Province of Ontario achieved a 69% reduction rate in bag usage and a 59.1% alternate use rate under the province’s 50% Reduction Program in just 3 years based on voluntary efforts. (2010 MOE Report)

**5. Demonstrated Negative Bias**

**Treatment of Litter:** Point 1 under environment is that bags “Can add to litter”. Why lead with that anecdotal statement when the fact is - as noted in point 2 - ‘Bags are a small fraction of litter’. The statement “Can add to litter.” needs to be removed, since it is opinion.

Further, the statement about bags in trees is anecdotal and does not merit mention in a policy document – what is the incidence, how many, what is the source, etc.?

**Landfill Statement:** The statement that:”Bags do not break down easily in landfill” is particularly misleading and should be removed. Science shows that **nothing** breaks down easily in a well-engineered landfill like Toronto’s. Further, it is commonly known that reusable bags cannot be recycled in Canada and will only add to Toronto’s landfill problems.

***Economic Impact Slides – These are not economic impact slides.***

We were shocked to see that little effort has been made by the City to understand the very real economic impacts of bag policy on GDP, jobs, manufacturing investment, multiplier impacts etc. The PowerPoint slides deal primarily with retailers and retailer implementation logistics, not economic impacts.

**Inaccurate Statement on Manufacturing Job Losses:** The PowerPoint says: “Bans impact plastic bag manufacturers and could lead to loss of jobs.” There is no doubt that a ban **WILL** lead to job losses in Ontario-owned, family-run businesses. Manufacturers will lose their market and have no one to sell to. Their equipment is highly specialized as plastic bags are a technology marvel of modern science and the equipment cannot be retooled to manufacture other things. Toronto bag policy could have a severe negative economic development impact leading to plant closures and job losses for many of the 33,000 workers employed in or who supply the bag and film sector.

**Inaccurate Statement on Cost Savings to the City:** The PowerPoint also states: “Annual cost savings to the City from reduction of plastic bags due to 5 cent charge - \$104,000”. Again this is not a true statement because it looks at bags in isolation and ignores the cost impacts as consumers switch to alternatives such as paper and heavier plastic kitchen catchers. There is ample research that shows that this will happen in the event of a ban on plastic bags. In fact, if the switch is to paper bags, SWM costs to manage these bags will **increase** 4 times to about \$400,000. As well greenhouse gas production will increase significantly. It should read: “**Annual cost savings to the City from the reduction of plastic bags due to 5 cent charge must be analyzed in the context of the alternatives residents adopted to replace the bags.**”

In conclusion, we trust that our concerns related to bias and accuracy will be addressed in ongoing consultations and the policy report that will be developed for PW&I. We look forward to a report that is balanced, fair and contains no bias - a report based on fact, data and research, which respects all stakeholders.

In the meantime, please remove or correct the consultation PowerPoint on your website so that any councillors, media, residents or other stakeholders are not misinformed.

Yours truly,



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Director General, Issues

Cc Mr. Christopher J. Williams, Partner, Aird & Berlis, LLP  
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