



Association canadienne
des restaurateurs et
des services alimentaires

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Canadian Restaurant
and Foodservices
Association

Lobbyist Registration #: 12642S-4

April 4, 2013

Ms. Kate Kusiak
Public Consultation Unit
City of Toronto
19th Floor, 55 John Street
Toronto, Ontario
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Dear Ms. Kusiak:

I am writing on behalf of the Canadian Restaurant and Foodservices Association (CRFA) to express our concerns regarding the options to reduce the use of plastic bags in the City of Toronto that were presented to industry at the March 27th, 2013 Plastic Bag Stakeholder Consultation Meeting.

Canada's \$63-billion restaurant industry employs more than one-million people, and serves more than 18-million Canadians daily. Toronto's more than 8,000 restaurants are a diverse economic engine for the city.

The overriding goal of reducing the use of plastic shopping bags in Toronto is to produce a net reduction of the environmental footprint of this particular material. However, the information developed through the consultation process suggests that implementing a ban on plastic bags will not result in a net environmental benefit due to several factors that have been highlighted throughout the consultation process.

These factors include: greater instances of people purchasing heavier plastic garbage bin liners (76% indicated they would purchase liners); the increased use of paper bags that can have a larger environmental footprint; and the increased purchasing of reusable bags, without the corresponding use required to offset the larger upfront environmental footprint of these bags. As well, reusable bags are not standardized and cannot be recycled through the Blue Box program.

Businesses located on the borders of the City of Toronto will also potentially be unfairly penalized as a result of any new fee or ban on plastic bags. Because customers can easily access businesses either directly inside or outside of City limits, potential customers may choose to shop outside of the City for the convenience of having the choice to use a plastic bag. This has been observed in other jurisdictions that have banned plastic bags.

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Reducing the prevalence of plastic in Toronto's waste stream will not be accomplished through a ban on one specific type of plastic. Instead, the City of Toronto should focus on working collaboratively with industry to develop a public education campaign that focuses on Reduction, Reuse, and Recycling. The relationship between a customer and a business owner is paramount, and the City of Toronto should not intervene in commercial transactions. Plastic bags are the property of the business owner, and it should be the owner's decision to incent consumer behaviour in any variety of ways.

Today, many businesses are voluntarily charging a fee, offering discounts and providing complimentary bags or carry-out alternatives and encouraging reuse. These actions are working. In Ontario, the reduction rate for plastic bag use is 69%, compared to a 53% reduction in Toronto, despite the lack of obligatory fees or mandatory bans. When accounting for reuse, these numbers would be even higher. Proposals to regulate plastic bag fees and/or introduce outright or expanded bans are simply solutions looking for a problem.

Recommendation: CRFA recommends that the City of Toronto adopt Option 1 from the consultation document titled *Options to Reduce the Use and Disposal of Plastic Bags in Toronto* in conjunction with a comprehensive joint education campaign with retailers.

Sincerely,



Douglas McCallum
Environment and Sustainability Manager

c.c.: Denzil Minnan-Wong, City Councillor
Chair, Public Works and Infrastructure Committee

Stephanie Jones
Vice President, Ontario and Sustainability, CRFA