

SUBMISSION TO: Kate Kusiak, Senior Public Consultation Coordinator  
SUBMISSION RE: Plastic Bag Stakeholder Consultation Meeting  
SUBMISSION BY: Karen Buck, President, Citizens for a Safe Environment  
SUBMISSION DATED: April 10, 2013.

**NO SUPPORT for OPTION #1: The City takes no further action.**

**SUPPORT for OPTION #2: Mandated Fee.**

- Re-instatement of 5-cent fee for all bags with a decision made on accountability and transparency of how the fee is collected and who receives and keeps the fee. **OR...**Provision of one free bag for a minimum number of purchases (to be decided/defined by retailer) and with an increased fee of 10-cents for all other bags as a purchase price to the retailer. There also needs to be policy on who receives and keeps the fee. There is an opportunity to mandate that a portion of the fee go to the Solid Waste Reserve Fund for Perpetual Care, improved operations (MBT) or expansion at Green Lane Landfill.
- The fee should apply equally to both plastic and paper shopping carry-out bags. This is not a program that would pit one industry against another but supports a level-playing field for industries providing plastic or paper carry-out bags in the retail sector.

NOTE: There is an opportunity for the manufacturer and retailer to print an educational message regarding the recyclability of their plastic or paper carry-out bag, how they have incorporated design for the environment and how they require assistance in ensuring consumers will recycle their bags and avoid disposal.

**NO CURRENT SUPPORT for OPTION #3: Mandated Ban**

- Could result in costly lawsuits to the City.
- Pits plastic industry against paper industry and removes level-playing field for the carry-out bag manufacturing and retail sector.
- Removes opportunity for manufacturers to adopt new EPR structures for cost efficiencies.
- To date there appears to be no accurate life cycle assessment which would prefer one type of material over another for the carry-out shopping bag.

NOTE: Jeffrey Morris of Resource Management in Seattle has used a model to compare disposal options but I am not sure if the model can be applied to evaluate one material use against another use in an analysis that involves in sustainability, greenhouse gas generation, environmental impacts, resource use, energy use and cost parameters.

NOTE: Chris Jordan, photographer extraordinaire, has some very interesting photographs on US plastic bag consumption Google Chris Jordan Running the Numbers 1...five images up from the bottom is an image of plastic bags that when magnified becomes a clear image of the 60,000 plastic bags that are

used in the US every 5 seconds. Also see Chris Jordan presenting his TED Talk at [http://blog.ted.com/2008/06/18/chris\\_jordan/](http://blog.ted.com/2008/06/18/chris_jordan/) His latest collective of photographic works depicting statistics is called “Intolerable Beauty”.

- In my opinion, mandated bans for high consumption of resource and energy use may become a future reality but Toronto seems to be reluctant now to take the important step to “long-lived reusable” bags. Too many “invested” interests and too little information for certainty that a mandated ban would be the best solution. In Toronto there must be no abandonment of the movement towards a Zero Waste future.
- Plastic, because of its inherent longevity and its tendency to break-up over time into very small pieces is threatening our waterways and oceans. This would tip the scales towards a reasonable ban on plastics that are being produced for single use or low repeated use, not making it into recycling programs and ending up in the environment or landfills.

## **CONCERNS with STAKEHOLDER CONSULTATION**

- Emphasis on only considering Council-Directed Options.
- No complete polling information was compiled and presented to the stakeholders in attendance , although polls were referred to or mentioned in the discussions.
- Limited factual information on Life Cycle Analysis that could have helped with a choice between paper and plastic in terms of the importance of sustainability, energy conservation, renewable resources and recyclability/compostability.
- The Canadian Plastic Industry Association website indicates that the plastic recycling loop is not a closed loop recycling process. Used plastic bags are not recycled into new plastic bags. In stead, plastic bags are shown to be recycled into other products where there could be market failure or market saturation. There was no information with regard to this same issue for paper bags, in particular, how many times the fibres could be recycled into new bags. The missing information meant that you could not eliminate one carry-out bag in favour of another carry-out choice.
- There was no information on the application of the recent Ontario Toxics Reduction Act and its implications for toxic substance reduction plans with regard to the following (included in the Act):
  - i. Materials or feedstock substitution.
  - ii. Product design or reformulation.
  - iii. Equipment or process modification.
  - iv. Spill and leak prevention.
  - v. On-site reuse or recycling.
  - vi. Improved inventory management or purchasing techniques.

vii. Training or improved operating practices.

- A lobbyist for the plastics industry, without declaring a conflict of interest, was permitted time to talk about the preference for waste-to-energy disposal as a preferred option over landfilling with no time for meaningful discussion or rebuttal.
- There was no discussion on the CCME-approved (October 29, 2009) Canada-wide Action Plan for Extended Producer Responsibility and a Canada-wide Strategy for Sustainable Packaging. Extended producer responsibility (EPR) is a sustainability policy approach in which a producer's responsibility for a product is extended to the full life cycle of that product. The implementation of The Canada-Wide Action Plan for Extended Producers Responsibility should be a consideration within the jurisdictional authority of each government, including Toronto.

## **MISSING AN OPPORTUNITY?**

### **RECOMMENDATION FOR EPR**

**The missed opportunity throughout the two-meeting consultation was the option that would shift responsibility for shopping carry-out bags to the producer-manufacturer as described in the CCME Canada-wide Strategy that was approved on October 29, 2009.**

- Toronto residents remain concerned about packaging and plastic bags and the siting of landfills.
- The CCME projected future generation of Municipal Solid Wastes waste is stated as being 1 billion tonnes in the next 25 years (2008-2033).
- “Managing these waste quantities is primarily the responsibility of Canadian municipalities. Perhaps the most difficult aspect is that municipalities have few tools to address the consumption and design of products that are purchased and used by their citizens and which, at the end of their life, become a municipal waste management responsibility.”
- “While there is a significant challenge in managing large quantities of solid waste, there is a bigger challenge in reducing waste generation in the first place and in increasing the diversion from disposal of those wastes that are produced. Gains in both of these areas will result in lasting environmental benefits, such as reduced risks from the release of toxic and hazardous substances and reduced greenhouse gas production.”
- “Many of these products are best managed through special collection and recycling systems that operate separately from conventional municipal waste management programs.
- “The “polluter pay” concept is an alternative waste management approach that has developed in response to these issues. This concept sees producers

ultimately being responsible for the end-of-life management of their products.” This is Extended Producer Responsibility (EPR).”

- “EPR shifts responsibility upstream in the product life cycle to the producer and away from municipalities. As a policy approach it provides incentives to producers to incorporate environmental [and cost] considerations in the design of their products.”
- “EPR also shifts the historical public sector tax-supported responsibility for waste to the individual brand owner, manufacturer or first importer.”
- “Part of the rationale for the EPR approach has been that giving responsibility for the end-of-life management of products to the manufacturer and/or importer of that product will affect the product’s entire life cycle and provide incentives to producers and first importers to more efficiently manage, with less environmental risk, the products at the end of life..”
- “The ability to redesign products with environmental considerations in mind rests most clearly with the producers that typically identify their products with a brand name and trademark. It is the producer who is ultimately responsible for the product design and production engineering, the choice of materials and techniques to be used in manufacture, the product’s energy consumption during use and the product’s packaging for distribution and sale.”

Note: The above ideas and quotes come directly from the approved Canada-wide Strategy for Packaging.

## **MISSING AN OPPORTUNITY?**

### **NEW POLICY RECOMMENDATIONS TO INCREASE RECYCLABILITY/RECYCLED CONTENT, ENERGY/RESOURCE CONSERVATION, REDUCTION OF TOXICIS**

**The final report to Council should recommend, new policies for sustainability that would be applied equally to both plastic and paper shopping carry-out bag manufacture. This might take the form of a sustainability plan or full EPR. Toronto should promote and recommend EPR within the municipality, within Ontario and within Canada to encourage disposal avoidance and resource/energy consumption. The recommendation would be a set of policies to guide industry, as follows:**

- Design for manufacture of bags should be using only one material not a combination of materials that need to be separated so that at end-of life-recycling is easily accomplished.
- The manufacturing process should be required to include post consumer content.
- Both the manufacturing and design processes should be required to limit the use of toxic materials in the process and end product. This consideration would include, among others, feedstocks, catalysts, printing inks/dyes and glues.
- Product design should be required to place an emphasis on using the least materials/resources and energy.

- All in-factory product material waste should be required to be collected and recycled back into the product manufacturing process.
- Design should be required to ensure that the product, in this case the shopping carry-out bag, embraces the concept of closed-loop recyclability, for example, used bag into new bag, and that, at the end-of-life there is no need for disposal of the bag or use as a disposal container.

NOTE: The above requirements could mean a reduction in the manufacturer's costs in terms of materials and energy used and of disposal costs avoided.

### **MISSING AN OPPORTUNITY? RECOMMENDATION FOR INCREASING RECYCLING OF PLASTIC BAGS AND INCREASING AVOIDANCE OF DISPOSAL**

**The final report to Council should include a recommendation for an effective education program to ensure that, in particular, a greater percentage of plastic bags are recycled and are, subsequently, diverted from disposal at Green Lane Landfill.**

- The 2010/2011 Toronto audit of plastic bag use indicated that only 15% of plastic bags used are recycled in Toronto's Blue Bin program.
- The audit indicated that 44% of plastic bags were reused in the Green Bin for organics collection prior to being disposed at landfill.. This practice becomes highly questionable. It might be more appropriate for Toronto residents to use paper bags exclusively in the Green Bin program. Municipalities in Simcoe require residents to use paper bags which become part of the composted soil product,,thereby, avoiding costly, and valuable space in Ontario's landfills.

NOTE: Remember when yard waste was allowed in plastic bags in Toronto. Then because of contamination of the compost product plastic bags were banned for yard waste. Paper bags and unlined containers replaced the plastic bags. Paper bags and unlined containers are the only allowed receptacles for yard waste and there was high acceptability rate for this change.

NOTE: Can't we be bold in Toronto and demand a ban on carry-out shopping plastic bags for Green Bin waste by citing the success of other Municipalities' practices and programs?

- With another 41% of plastic bags being reused for household waste the current landfilling of plastic bags is an unacceptable 85%. It has been stated in the literature that it is only 12 to 20 minutes before the majority of carry-out plastic bags become bags for waste destined for Green Lane Landfill.

NOTE: Can't we also be bold and ban plastic liners for use in the Toronto mandated garbage bins. Toronto residents all have garbage bins that should not require plastic liners since we have programs in place to divert organics and recyclables. Could it mean a greater diversion rate for organics? The road toward Zero Waste will not always be smooth and devoid of bumps along the way.