



April 12, 2013

Ms. Kate Kusiak
Senior Public Consultation Coordinator
Public Consultation Unit
City of Toronto

By e-mail: kkusiak@toronto.ca

Dear Ms. Kusiak,

Re: Comments for Plastic Bag Report to Public Works and Infrastructure Committee (PWIC) on Bag Management

Further to our participation in the City's consultation process on plastic bags, the Canadian Plastics Industry Association (CPIA) & the Canadian Plastic Bag Association (CPBA) would like to offer the following comments, in addition to our previous comments contained in our letters of February 25, March 6 and March 26, 2013, which we anticipate will be incorporated into the staff report to PWIC on June 19.

1. Report that will be Factual and Balanced: We expect the staff report to PWIC will be fact-based. This is with the proviso that the facts presented are accurate, correct and free of opinion. To further this, CPIA has attached its amendments to the City's document on Pros and Cons of Options to Reduce Plastic Bags. (See attached Appendix A)

2. Include the Voluntary Fee and Enhanced 3R's Bag Management Option: If the report does review factually the various options on bag management outlined to date by staff, we expect that it will include the "Voluntary Fee & Enhanced 3R's Bag Management" option which received almost unanimous stakeholder support during the Feb. 28th consultation. (See attached Appendix B) This option builds on the City's success to date on bag management and incorporates a more strategic focus on diversion.

3. Voluntary Approaches are highly effective: We continue to encourage voluntary versus regulatory approaches since they have successfully reduced the number of bags going to

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landfill. Ontario and Quebec provincial governments undertook highly successful 50% reduction programs using a voluntary partnership approach with industry and retailers. These voluntary programs led to rapid reductions in bag use in excess of 50% within 3 years well ahead of the 5 year targeted deadline. Across Ontario, the result was a 69.6% reduction in bag use, a 59.1% alternate use rate and a 36.5 % recycling rate. (2010 Ontario MOE Bag Analysis)

4. Build on success with positive approaches and capitalize on Toronto's uniqueness:

Toronto's current approach to bags has been highly effective leading to a 50%+ reduction in bags distributed, an 80% reuse rate, a 58% adoption rate for reusable bags and a 75% recycling rate of the 20% of bags available for recycling.

Toronto is unique. It is the **only** jurisdiction in Canada with an 80% reuse rate and has engineered its green bin program to use the plastic bag to drive increased citizen participation in diverting organics from landfill.

5. Accelerate success through ongoing public education: There is strong stakeholder consensus that bag diversion through reuse and recycling could be driven to higher levels if promoted with Torontonians. Cooperative efforts working in partnership with the City have been offered by the two key stakeholders - industry and retailers.

6. More Significant Gains can be Achieved by Focusing on Diversion with Few Gains to be made by Continuing a Single-minded Focus on Checkout Reduction: Source reduction (at check out) according to large retailers, who continue to charge fees and report a 70% reduction in bags distributed, is believed by the industry and retailers alike to be "maxed out". In other words, there is little room to further reduce the number of bags distributed given the necessity of bags for public health and household waste management purposes in Toronto.

Clearly, the most significant gains to eliminate bags from landfill can be achieved through an energetic focus on diversion efforts – focusing on reuse and recycling to divert as many bags as possible from landfill. For example:

- The 44% of bags reused to divert green-bin organics from landfill, should not go to landfill themselves. These bags once emptied of organics can be diverted from landfill and recycled into valuable wax and oil lubricants to be used in manufacturing processes.

- Again, we point out that the 75% bag recycling rate of the 20% of bags available for recycling could be further increased with cooperative promotion between the city, industry and at retail.

No clean bag should ever end up in landfill – plastic grocery bags are too valuable to waste!

7. Impacts of Bag Alternatives Need to be Examined: To date, we have seen no evidence of the City examining the impacts of alternatives to plastic bags on Toronto's waste management system operations and most importantly, their impact on how residents would manage their household waste and organics – plastic bags are a practical necessity. For example, 'kitchen catchers', can contain up to 76% more plastic and paper bags, weigh 55 grams versus plastic

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bags at 8 grams. What is more environmentally responsible – using a ‘kitchen catcher’ once or reusing a plastic shopping bag for household waste? We believe that the loss of the plastic bag would seriously undermine the green bin organics program which is set to expand over and above its current diversion level of 110,000 metric tonnes a year from Toronto’s landfill.

8. Bag policy must consider the long-term and be futuristic in its focus: The go-forward bag policy MUST be appropriate for **ALL** types of housing. The housing landscape of Toronto is evolving rapidly away from single-family to multi-residential/high rise dwellings. Over one million Torontonians currently live in high rises where plastic bags are a necessity to transport household waste to ground level. The bag policy must ensure that it is appropriate not just for single-family dwellings but high rises as well.

9. Bag Policy Must Consider Economic and Social Impacts: We are mindful of the number of jobs and firms that could be put at risk by city action on bags. Most manufacturing firms are Ontario-owned, family-run enterprises employing some 33,000 Ontarians across the entire value chain. It does not benefit the City or the Province at a time of declining manufacturing to take policy actions that cost jobs and encourage de-investment in the City of Toronto.

10. On Oct. 31, 2008, Toronto Staff Recommendations Recognized the Practical Need for Bags (referred to as ‘Target Material’ in the following quote) and their Recycling Potential

“Staff explored the concept of an outright ban on all of the Target Materials, but concluded that this would be onerous, inconvenient and impractical for both retailers and residents. Single-use Target Materials should still be available, as long as they are compatible with recycling programs. Our recommended approach drives the recyclability of the Target Materials and provides residents with the tools and knowledge to make an environmentally responsible choice.”

CPA and CPBA support the balanced approach that is currently in place in the City of Toronto with retail and industry that encourages reduction, reuse and recycling (3R’s). If you have any questions on the key points we have highlighted in this letter or the comments made in the Pros & Cons comments and in the Voluntary Fee & Enhanced 3R’s Bag Management option, we would be happy to meet with you and clarify our comments.

Yours truly,



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Director General, Issues

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Cc Mr. Christopher J. Williams, Partner, Aird & Berlis, LLP
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Mr. Jim Harnum, General Manager, Solid Waste Management Services, City of Toronto

Mr. Vincent Sferrazza, Director, Solid Waste Management Services, City of Toronto

Attachments – Appendix A – Pros and Cons of Options to Reduce Plastic Bags incl. CPIA/CPBA comments

Appendix B – Voluntary Fee & Enhanced 3R's Bag Management Option