

PROS AND CONS OF OPTIONS TO REDUCE PLASTIC BAGS

City of Toronto Comments in **Black** CPIA/CPBA Comments in **Red**

| OPTION     | Description/<br>Concept   | Impacts<br>Pros   | Impacts<br>Cons   | Notes  |
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| Status Quo | <p>City of Toronto does not mandate a fee or ban related to retailers providing customers with a plastic shopping carry-out bag and leaves it up to retailers to charge a fee or not for provision of these bags.</p> <p>Toronto Municipal Code Chapter 604 prohibits retailers from offering plastic bags that are not compatible with the City's Blue Bin recycling program.</p> <p>- Is incomplete. Does not recognize that current system is highly effective reducing use and disposal of bags based on the 3 Rs.</p> <p>- ADD: Large retailers responsible for the majority of the bags distributed in Toronto, they continue to charge fees on a voluntary basis.</p> <p>- ADD: Plastic bags are used to divert over 110,000 tonnes of organics from landfill; system is</p> | <p>- When shopping bags are recycled, City receives revenue from sale of plastic film</p> <p>- Consumers retain the choice to select their preferred carry-out bag</p> <p>- No additional cost to consumer</p> <p>- Less than 25% of large retailers continue to charge for bags, without government intervention. (RCC, Feb 28) This is not a pro - it is a con and may be incorrect. This point needs to be validated by an audit and a focus on unit volume of bags sold into the market (i.e. do 80% of the bags distributed have a fee?)</p> <p>Topline CPIA audit and store checks show the following still charge bag fees: Loblaw's, No Frills, Superstore, Fortino's, Valu-Mart, Joe Fresh, Wholesale Club, Bloor Market, Sobeys, IGA, Foodland,</p> | <p>- Does not foster environmental behavioural change</p> <p>- Could see increase in plastic bags since fee was rescinded in June 2012</p> <p>- Retailers that continue to charge a fee may cause confusion for residents. <b>Strange statement, since voluntary fee has been in place for 8 months now and consumers are NOT confused, irritated perhaps but not confused.</b></p> <p>- ADD: City needs to do a better job diverting waste from landfill in high rises under any option. Too much focus on single family dwellings – with half the population living in multi-residential dwellings.</p> <p>Delete statement since it is untrue and shows bias – “Does not foster environmental behavioural change”. Resident practice 3 R's and behavior has changed.</p> | <p>Seen by some as reversing on environmental progress following rescission of bag fee</p> |

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|  | <p>engineered around the plastic bag.</p> <p>- ADD: Retailers divert 33% of bags from the city SWM system through at store recycling and diversion (MOE 2010 Bag Report).</p> <p>-ADD: Retailer reduction programs include public education at checkout. Do you want bag programs to promote reduction?</p> <p>- ADD: Retailers promote bag reuse and sell reusable bags. 58% adoption rate of reusable bags in the CofT.</p> <p>- ADD: Toronto has a sophisticated multi-bin recovery program for bags. Bags introduced into the blue bin in December 2008. Bags recycled in the blue bin are remanufactured locally into new products creating local green employment.</p> <p>- ADD: Bags are a necessity for the 1 million people who live in high rise/multi-residential dwellings to manage their household waste.</p> | <p>Price Chopper, Metro, Food Basics, Drug Basics, Rabba Foods, Rexall Pharma, Shopper's Drug Mart, Winners, Highland Farms, Home Hardware.</p> <p>- ADD: Bags currently less than 0.2% of landfill and 0.8% of litter. (CofT audit)</p> <p>- ADD: Bags are a necessity to manage household and pet waste particularly in high rise or multi-residential dwellings.</p> <p>- ADD: Have achieved a 53% reduction in bag use and a 58% adoption of reusable bags. Can further reductions be achieved given the practical need and high reuse (est. 80%) of bags for household waste and green bin organics? Bags are a necessity for the 1 million people living in high rise/multi-residential dwellings.</p> <p>- ADD: Recycled bags provide the city with a revenue stream and with equipment paid in part by</p> | <p>- ADD: Alternatives are not better for the environment and will have an impact on Toronto's waste stream. eg. The use of paper bags will trigger an immediate increase in the amount of waste in waste stream and as a result the number of garbage trucks, which will lead to a significant increase in green- house gas emissions. (See Taiwan Study)</p> <p>- Report needs to find a balance between environmental, social, and economic impacts; not just focus on the environmental impact. This type of bias needs to be removed from the report. City already as an excellent environmental option, which can be enhanced.</p> <p>- ADD: Little public education was done on the introduction of plastic bags into the blue bin recycling program.</p> <p>- ADD: Reusable bags cannot be recycled in Canada and will present a serious disposal and landfill problem over time as they end their useful life.</p> <p>- "Could see increase in plastic bags since the fee was</p> |  |
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|  |  | <p>Stewardship Ontario to help with sorting.</p> <p>- ADD: Bag and film manufacture employs some 33,000 province-wide, 50% in the Toronto area.</p> <p>- ADD: Plastic bags have the smallest environmental impact of all alternatives – paper, cotton, reusables. (2011 UK Study)</p> <p>- ADD: Little out-migration of retail customers; protects Toronto retailer profits, given slim margins.</p> <p>- ADD: Recognizes necessity of bags for impulse/unplanned purchases. Convenience store impulse purchase business and jobs protected.</p> | <p>rescinded in June 2012” is a valid statement but an increase most likely would be minimal, since retailers are still charging a fee. So the challenge is how through public education and retailer efforts in the private sector can we minimize this type of erosion?</p> |  |
| <p>Status Quo + Collaborative Education Campaign</p> | <p>City of Toronto collaborates with retailers and industry to conduct an extensive education campaign to promote the 3Rs</p> <p>This should be incorporated with the variation below.</p> | <p>- Consumers retain the choice to select their preferred carry-out bag</p> <p>- No additional cost to consumer “except for the purchase of reusable bags”.</p> <p>- ADD: Strong evidence of success of voluntary</p>   | <p>- One-time messaging may not be adequate in changing behaviour. Sustained messaging may be necessary.</p> <p>ADD: This is expected and needs to be addressed with on-going public education.</p>   |  |

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|  |  | <p>initiatives in Ontario -69.6% reduction in bag use in 3 yrs. province-wide. (2010 MOE Report)</p> <p>- ADD: Canadians embrace product stewardship and the 3R's approach to manage bags</p>  |   |   |
| <p>Status Quo +<br/>Recycle plastic bags in Green Bin stream</p> | <p>Recycle plastic bags found in Green Bin stream.<br/>Should be "Explore ways to divert green bin plastic bags from landfill through different recycling, conversion and energy options."</p> <p>- This should be part of the previous option above and not segregated.</p> <p>- ADD: Green Bin engineered around plastic shopping bag. Continue to use plastic bags to divert 110,000 tonnes of organic waste from landfill per year.</p> <p>- ADD; Expand program to 100% of all high rise/multi-residential dwellings.</p> | <p>- Diverts more plastic bags from landfill</p> <p>- ADD: Diverts 110,000 tonnes of organics from landfill (approx. 28 - 30% of Toronto's solid waste). Extends life of the landfill.</p> <p>- City receives revenue from sale of plastic film collected in Blue Bin Program – point should be deleted. Does not relate to Green Bin.</p> <p>ADD: Strong opportunity to divert green bin bags from landfill to EFW facilities, or to recycle as new fuel options, waxes, oil &amp; fuel pellets. Bags are pieces of frozen natural gas (stored energy). One bag can power a light bulb for 30</p> | <p>- Does not foster environmental behavioural change</p> <p>Demonstrates bias. Statement is not true as the 3R's has changed how people see what was once perceived to be garbage as valuable resources. Bags help divert organics and are reused and recycled. How to use resources responsibly at the end of their useful life is the whole purpose of the green bin. Plastic bags are the preferred vehicle for this.</p> | <p>SWM staff confirmed that plastic bags that are removed from the front end of the Green Bin process are too contaminated and it is unlikely they can be recycled.</p> |

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|                                  |  | <p>sec.</p> <p>ADD: Important vehicle to manage organics in high rises.</p>  |  |   |
| <p>Voluntary Plastic Bag Fee</p> | <p>Retailers voluntarily charge a fee for each plastic shopping carry-out bag provided to customers</p> <p>- ADD: Currently in place with large retailers responsible for majority of bags distributed in Toronto.</p> | <p>- Consumers retain the choice to select their preferred carry-out bag and to shop at retailers that do not charge a fee</p> <p>- Retailers retain the choice to charge a fee for plastic bags</p> <p>- Retailers can leverage voluntary green/reduction initiatives as a marketing opportunity</p> <p>- ADD: Voluntary fee does not intrude into the marketplace and allows for diverse business models.</p> <p>- ADD: Promotes voluntary environmental behavioural change based on the 3 Rs and individual responsibility. Province of Ontario saw a reduction of 69% over 3 years on bag usage without fees or bans, through the promotion of all</p> | <p>- Retailers may choose not to charge a fee and will use any opportunity to compensate for decline in sales/revenue from loss of consumers to online retailers and cross-border shopping (RCC, Feb 28).</p> <p>- Small retailers unlikely to charge a fee because they cannot compete with large retailers (TABIA, Feb 28)</p> <p>- It is harder for small or “front of line” retailers to charge a fee because they will experience push back (TABIA, Feb 28)</p> <p>- CHANGE: “City of Toronto may see decrease in revenue received from sale of plastic bags collected in Blue Bin Program” TO: “Will see a decrease in revenue from sale of plastic bags collected in Blue Bin Program.”</p> | <p>- COMMENT: City needs to provide research reports related to behavior changes.</p> |

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|                          |  | 3R's.   |  |   |
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| Mandated Plastic Bag Fee | <p>Retailers must charge a fee for each plastic shopping carry-out bag provided to customers</p> <p>Variation 1A: Retailers provide limited number of plastic shopping carry-out bags for free and charge a fee for each additional bag</p> <p>Variation 1B: Retailers must charge a fee for each plastic shopping carry-out bag or paper carry-out bag provided to customers.</p> | <p>- City of Toronto has experience in implementing this policy option</p> <p>- \$104,000 in annual cost savings for City of Toronto from reduction of plastic bags in waste system</p> <p><b>False statement and Toronto has admitted this was done in isolation of other unintended impacts – substitution of alternatives to plastics such as heavier plastic and paper bags to manage waste will have a financial impact. Paper could increase costs by 400%.</b></p> <p>- 53% reduction in generation between 2008 (no fee) and 2012 (fee) (CoT, SF audits). RCC estimates it is closer to 70% reduction (Feb 28)</p> <p>- 90% of Torontonians changed behaviour (decreased use) in response to the fee (Research conducted by SO, Sept 2010)</p> <p>- City of Toronto may see</p> | <p>- Despite by-law, some small retailers did not charge for bags and/or did not list charge in receipt tape (TABIA, Feb 28)</p> <p><b>Puts small retailers at a competitive disadvantage. Strong pushback from customers that cannot be absorbed by smaller retailers.</b></p> <p>- CoT Act does not allow the City to direct retailers on how to spend the collected fees.</p> <p>- Requires consistent monitoring and enforcement for compliance <b>Very difficult to enforce.</b></p> <p>- May affect low-income households</p> <p><b>- Retailers may switch to paper bags which will have greater environmental and cost burden. (Paper bags have greater environmental burden due to more resources required and heavier weight. (UK Environmental Agency, 2011)</b></p> <p><b>- ADD; Puts financial burden on residents. Seen as a tax if mandated.</b></p> <p><b>- ADD: Infuriates residents who</b></p> | <p>Residents retailers are familiar with this policy</p> <p>There is a negative public perception on bag fees collected as additional revenue for retailers.</p> <p>Despite statistics from City of Toronto's single-family audits and Stewardship Ontario's audits that shows the effectiveness of the mandated fee, some Councillors do not support the fee and feel that retailers have financially benefited from sales of plastic bags. RCC states this is not the case.</p> |

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|                          |  | <p>decrease in revenue received from sale of plastic bags collected in Blue Bin Program</p> <ul style="list-style-type: none"> <li>- Some large retailers reinvested a portion of collected funds into community or environmental initiatives</li> <li>- Promotes environmental behavioural change. Customers are reminded of their environmental impact each time at checkout.</li> <li>- Consumers retain the choice to select their preferred carry-out bag</li> <li>- 58% have switched to reusable bags (Telephone survey of 110 TO residents in July 2011 by Silverhill Inst.)</li> </ul> | <p>believe that the money should flow to the city and not to retailers.</p> <ul style="list-style-type: none"> <li>- ADD: Serious civil disobedience with many small retailers not charging the fee.</li> <li>- Ignores the 3 Rs with sole focus on reduction. Ignores reuse and recycling which are strong diversion strategies. Ignores individual responsibility for product stewardship.</li> </ul> |  |
| Mandated Plastic Bag Ban | <p>Retailers are prohibited from distributing plastic shopping carry-out such as paper or reusable bags can be provided by the retailer for free or for a charge. Variation 2A: Exempt small bags. Alternatives retailers (defined by square footage</p> | <ul style="list-style-type: none"> <li>- Estimated that a ban could result in approximately \$200,000 in annual cost savings for the City of Toronto (SWM staff, Feb 28) <b>Delete this false statement. It ignores the impact of alternatives on the waste stream. This is</b></li> </ul>  | <ul style="list-style-type: none"> <li>- <b>City's focus seems to be solely on retailers which will financially adapt and economically benefit from any decision on bags and not on manufacturing sector and job impacts, which will be hollowed out by a ban.</b></li> </ul>   | <p>RCC noted that the date of effect should not coincide with busiest time/months in retail (e.g. last 2 months and first month of the</p> |

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|  | <p>of retailer property or revenues)</p> <p>Variation 2B: Ban affects large retailers in phase 1. By-law extended to all retailers in phase 2.</p> <p>Variation 2C: Retailers are prohibited from distributing plastic shopping carry-out bags and must charge a fee for each paper bag.</p> | <p>not focused on real world practical experience. Toronto has admitted this estimate was done in complete isolation of the unintended impacts</p> <p>- There will be no cost savings for managing bags. In fact costs will increase 400% - 700% due to residents switching to alternatives.</p> <p>- Over 70% of residents will switch to alternatives – heavier kitchen catcher plastic bags and/or paper bags. Paper is 4 to 7 times heavier and will increase the amount of waste by volume and weight in Toronto’s waste stream.</p> <p>- City of Toronto may see decrease in revenue received from sale of plastic shopping bags collected in Blue Bin Program. <b>Toronto WILL see a decrease in revenue since there will be no plastic bags.</b></p> <p>- Most effective of the options in reducing plastic bags</p> | <p>- Even so, retailer focus is primarily on implementation logistics and not real economic impacts.</p> <p>- Also completely ignores the public health impacts of alternatives and the environmental impacts of alternatives.</p> <p>- Reusable bags cannot be recycled in Canada and will end up in landfill at the end of their useful life.</p> <p>- Paper bags will have a severe negative economic and environmental impact on the city’s effort to reduce the amount of waste in the SWM system and going to landfill. Alternatives will increase costs by as much as 400 – 700%.</p> <p>- Large retailers require ~9-12 months to prepare for the ban (RCC, Feb 28)</p> <p>- Sourcing alternative paper bags could take 3-4 months (RCC, Oct 19)</p> <p>- It will take ~3 months for large retailers to deplete existing stock of plastic bags (RCC, Oct 19), ~6 months for small</p> | <p>year)</p> |
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|  |  | <ul style="list-style-type: none"> <li>- Strongly promotes environmental behavioural change. Customers are reminded of their environmental impact each time at checkout.</li> <li>- Switch from plastic to paper bags could have positive economic impact on paper bag industry.</li> <li>-</li> </ul> | <ul style="list-style-type: none"> <li>retailers (TABIA, Oct 19)</li> <li>- Retailer need time to retrain staff and reconfigure checkout processes. One large retailer reported approximately 1 million dollars cost (RCC, Oct 19)</li> <li>- It is harder for small or “front of line” retailers to charge a fee because they will experience push back (TABIA, Feb 28)</li> <li>- Retailers require more storage space for alternatives (paper and reusable arguably take up more space) <b>Remove “arguably”. There is no argument about this – demonstrates bias.</b></li> <li>- Paper bags cost 3 times more than plastic bags (Hymopack, Feb 28)</li> <li>- Additional cost to the City to develop, administer, and enforce ban</li> <li>- <b>Additional costs to the City to collect alternatives which are heavier and take up more space. Will not extend the life of the landfill, but will in fact lead to more material going to landfill.</b></li> </ul> |  |
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|  |  |  | <ul style="list-style-type: none"> <li>-Communicating by-law information to retailers is challenging as the retailer mailing list provided by the Province is not fully accurate. A one-time communication and education campaign is inadequate, it will require sustained communication to educate retailers and public</li> <br/> <li>- Alternatives to plastic bag are not necessarily better for the environment due to the resources required for production and weight relative to the plastic bag.(UK Environmental Agency, 2011)</li> <br/> <li>- Residents lose option to choose carry-out bag</li> <br/> <li>- May affect low-income households</li> <br/> <li>- 76% of Ontario residents indicated that they would buy waste bin liner bags if there was a ban (Decima study, 2007)</li> <br/> <li>- Customers may find ban on plastic bags inconvenient for impromptu purchases. Retailers (may) <b>will</b> experience decreased sales from resulting decline in impromptu</li> </ul> |  |
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|  |  |  | <p>purchases.</p> <ul style="list-style-type: none"> <li>- Retailers near Toronto's borders may experience decreased revenues from cross boundary movement of consumers. Survey of economic effects of LA County's bag ban found 80% of stores in areas affected by ban reporting average 5.7% decrease in sales. (National Centre for Policy Analysis, 2012)</li> <li>- Ban of plastic bags negatively impacts Canadian plastics industry. 54,500 people in the Toronto area work in plastic bag and film manufacturing sector (All About Bags) <b>Industry cannot adapt. 33,000 people work in or supply the bag and film industry in Canada; 50% in the Toronto area. <u>Plant closures inevitable as machinery cannot be retooled to produce anything else nor can it be sold.</u> Banks unwilling to loan industry money to retool. Bankruptcies and significant job losses will ensue. This will also impact Toronto's tax base negatively and sends the message Toronto not open to business investment.</b></li> </ul> |  |
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|  |  |  | - Bans fail almost everywhere implemented as consumers pursue aggressive avoidance strategies. |  |
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