



The Recycling Council of Ontario (RCO) is a multi-stakeholder, not-for-profit organization committed to minimizing society's impact on the environment by eliminating waste.

RCO's mission is to inform and educate all members of society about the generation of waste, the avoidance of waste, the more efficient use of resources, and the benefits and/or consequences of these activities.

RCO has a 30 year history in the province of Ontario as supporting balanced but progressive policies that focus on environmental outcomes, based on a hierarchy that prioritizes waste prevention and resource conservation.

www.rco.on.ca

Objective

The City of Toronto has requested feedback on the “benefits and implications of a range of measures to reduce the use and disposal of plastic bags in Toronto”. The following document will outline the Recycling Council of Ontario’s (RCO) position on single-use carryout shopping bags provided by retailers.

Principles that frame the Policy Position

Adherence to the 3Rs Hierarchy (Reduce, Reuse and Recycle – in that order)

As stated in its mandate, RCO believes that society must minimize its impact on the environment by eliminating waste. To that end, our mission is to inform and educate all members of society about the generation of waste, the avoidance of waste, the more efficient use of resources and the benefits and/or consequences of these activities. Of our 11 guiding principles, the following 8 are relevant to the policy position on carryout shopping bags. RCO believes that policies and programs should be evaluated based on their abilities to support environmental protection and economic sustainability using the following guiding principles.

- 1) *Shared Responsibility***— RCO believes that responsibility for minimizing environmental and economic impacts must be shared by all parties that benefit from and/or impact on the production, distribution, use, and/or disposal of products and packaging or delivery of services. In sharing responsibility, the parties should have the authority and ability to

influence those policies and practices that affect them.

- 2) **Regulatory and Legislative Initiatives**— RCO believes that governments should intervene using regulatory and/or legislative mechanisms where voluntary initiatives are not in place or fail to adequately protect the environment.
- 3) **Non-Regulatory Initiatives**— RCO supports non-regulatory environmental protection and remediation initiatives implemented on a voluntary basis providing there are mechanisms to monitor performance and that there are consequences for non participants and/or failure to meet established performance standards.
- 4) **Level Playing Field**— RCO believes that government(s) should support environmental policies and practices that ensure equitable participation through the introduction of incentives, disincentives or if necessary, regulations.
- 5) **Economic Instruments**— The RCO believes that financial incentives/economic instruments should be used to encourage the development and implementation of environmentally sound programs and practices. Moneys generated through these instruments should be used to support such programs and practices.
- 6) **Accountability**— The RCO believes that participants in both voluntary and regulatory environmental programs and practices should be continually monitored and held accountable for meeting established goals, targets or standards. Monitoring data and analyses should be publicly available.
- 7) **Communication and Education**— RCO believes that stakeholders should be adequately informed and educated as to their respective roles and responsibilities in environmental programs and the results and effectiveness of their participation in these programs.
- 8) **Public Participation**— RCO believes that all stakeholders should have the opportunity to participate in the development of environmental policies and the monitoring of environmental programs and practices. RCO believes that adequate resources should be made available to ensure such participation.

Facts on Plastic Bags in Ontario:

To establish its position on carryout shopping bags, RCO will consider the following facts:

The plastic bag levy reduced plastic grocery bags and changed citizen's behaviours

Once implemented, the plastic bag levy has proven to be an effective policy to reduce consumption of single-use bags. The City of Toronto reported that the bag levy resulted in a

53% reduction in generation of plastic bags (equivalent to approximately 242.2 million bags annually) between 2008 (prior to 5 cent charge) and 2012.

The City of Toronto saved money as a result of the levy

The City of Toronto saved money by introducing the plastic bag levy. Annual cost savings to the City, (Public Works) from the reduction of plastic bags generated was an estimated **\$104,000.00.**

Discarded Plastic Bags are found in Ontario waterways and ecosystems

Plastic shopping bags are present in Ontario waterways and ecosystems. The 2012 Great Canadian Shoreline Cleanup found that the third most prevalent form of litter collect by Ontario waterways was plastic bags (approximately 70 thousand bags collected). A report by Doctor Sherri Mason, a chemistry Professor at Suny Fredonia State University, has found that parts of the great lake have more plastic per square km than anywhere recorded in the great pacific garbage patch.

Citizen's reduced the number of bags they used as a result of the levy

A study conducted by Stewardship Ontario in September 2010 found that **90% of Torontonians had changed their behaviour** as a result the plastic bag levy, and decreased their use of plastic bags

Citizens were content with the levy

Forty-three percent of those surveyed felt that the by-law has a worthwhile impact on reduction of plastic bags. A study conducted by Stewardship Ontario in September 2010 found that only 25% of the surveyed individuals were unhappy about the by-law

LCAs have differing conclusions on the environment benefits of paper and plastic

Life cycle analysis studies comparing paper to plastic carryout bags are not unanimous in their conclusions. Both material types appear to have advantages and disadvantages.

The City of Toronto identified four main objectives for implementing a policy tool to support carryout shopping bag reduction as a part of the overall strategy to achieve 70% waste from landfill:

- 1) Bring awareness to carryout bag overuse and promote readily available and effective reuse alternatives;
- 2) Reduce the number of carryout bags used in the market and distributed to Toronto customers;
- 3) Reduce the number of carryout shopping bags found in Toronto's disposal stream and the costs associated with managing them;
- 4) Increase the number of carryout bags collected and recycled.

RCO Policy Position:

RCO supports any and all policy instruments (incentives or disincentives) that encourage reduction in consumption/use of single-use carryout bags. In general terms, when evaluating multiple policy instruments that could encourage waste minimization, RCO supports policy instruments that prioritize reduction first.

Considering the environmental and economic outcomes that resulted from the introduction of the 5 cent bag levy and in keeping with RCO's guiding principles, RCO supports maintaining this financial incentive/disincentive.

The following are RCO's recommendations to form the City of Toronto's policy on carryout shopping bags:

- 1) Introduce a by-law that would require all retailers to charge a minimum fee for each single-use carryout bag requested by the customer. The levy should be no less than 5 cents. Retailers must permit and encourage customers to bring and use a reusable or alternative option to carry out their purchases.
- 2) A single-use carryout bag should be defined as a bag designed and made for the purpose of transporting the customer's purchased goods/merchandise out of the establishment. The by-law should make no differentiation between carryout shopping bags created from paper or plastic.
- 3) To be considered a reusable carryout bag, the bag must be designed and made from a durable material and be able to be reused multiple times. To that end, RCO recommends that reusable carryout bags be defined in the by-law. A minimum thickness (defined per product material type) could be used in the definition. For example, Santa Monica

California has found that 2.25 Mil thick plastic bag should be defined as a reusable. A bag that *could* have a second purpose before recycling or disposal is not necessarily considered reusable.

- 4) The by-law should include a robust reporting mechanism. Retailers must report to the City of Toronto the annual number of bags distributed to their customers. Independently managed retail bag collection and recycling programs should also be reported to the City of Toronto. All of this data should be available to the public.
- 5) The by-law must be enforced and noncompliance penalized: A monitoring program or mechanism to ensure compliance is maintained should be part of the by-law. Those retail establishments found out of compliance with the by-law should be penalized accordingly.

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