

July 9, 2018

Ms. Jaye Robinson, Chair  
Public Works & Infrastructure Committee  
10th floor, West Tower, City Hall  
100 Queen Street West  
Toronto, ON M5H 2N2

VIA E-MAIL: [pwic@toronto.ca](mailto:pwic@toronto.ca)

**RE: PW 31.10 Options to address single use items misleading advertising and textile waste in the City of Toronto**

Dear **Chair and Committee Members,**

On behalf of the Ontario Restaurant, Hotel and Motel Association (ORHMA) members I am writing with regards to item PW 31.10 Options to address single use items and misleading advertising and textile waste in the City of Toronto. The Solid Waste Management Services staff is seeking time for further review and consultation which we support as we have initiated conversation with the team at the Solid Waste Management services to ensure they were aware of our concerns going forward with the options for single use items.

We are pleased to see that the staff will seek input into your process to advocate the need for single use packaging in our restaurant industry. The ORHMA and it's membership would like to encourage an open dialogue with our industry and the City of Toronto residents as it will be key to finding appropriate recommendations.

Over the past several years, the QSR industry has reached out to work with the City to improve recycling opportunities for single use packaging. The restaurant industry remains keen to explore how to partner re: recycling initiatives and should be included in working groups.

Single use packaging has a role to play in today's society and was introduced into the marketplace with a view to preserve the health and safety of consumers. Voluntary initiatives exist today to promote reduction in many restaurants such as china plates, bowls, cups and many offer a discount to bring your own travel mug to the restaurant.

We strongly believe more work needs to be done across municipal boundaries to standardize what is collected and consolidate materials in order to achieve economies of scale and increase opportunities for waste diversion. The environmental impacts of packaging should be viewed from a broader perspective than end-of-life alone. While a product may be recyclable and/or compostable, it may not have a more favourable impact from a life cycle assessment perspective. Innovation should not be stifled with a lens of fitting into an existing system that is not prepared to adapt and work to accept new materials.

We recognize that the wait to transition to full extended producer responsibility has slowed progress at the municipal level related to waste diversion innovation. However it is challenging to make progress and have productive communications when municipalities are unable / unwilling to make changes to existing programs.

It is important you are aware that it is difficult for nationwide/global companies to make packaging decision to adhere with local programs with vary from city to city. The majority of restaurant companies vet their packaging claims via regulatory guidance from a national perspective.

Lastly, it will be extremely important and valuable to understand how the City of Toronto plans to work with the new provincial government on these initiatives. We look forward to being engaged. As an important stakeholder we anticipate a seat at the consultations and any working groups that are initiated to review packaging.

The ORHMA represents 4,000 members and 11,000 establishments across Ontario at both the provincial and municipal levels and in Toronto through the ORHMA Toronto Region. Our members represent a wide range of establishments including fine dining restaurants, local pubs, ethnic and trendy foodservice concepts. Many of them operate with patios located on city boulevards. An overwhelming percentage of our membership is operated by independent small business.

We thank you for your time, consideration and commitment to working with Toronto's hospitality industry. Together, we can make a true difference in sustaining and growing Toronto's small businesses. We are available to meet along with ORHMA Toronto Restaurant Owners and Operators to discuss these very important policies.

Yours truly,



Leslie A. Smejkal  
Vice-President, Government Relations  
Ontario Restaurant Hotel & Motel Association