May 17, 2019

Dear General Government Licensing Committee,

This letter is to request the City of Toronto’s participation in Diabetes Canada’s used textile diversion program. Diabetes Canada is presently partnered with York University to conduct Canada’s first national study on textile waste diversion, identifying the economic, environmental and social impacts of textile diversion for municipalities. Your municipalities’ participation in this study is vital, as our findings will be used to inform new legislation regarding the management of used textiles in Ontario and across the country.

We firmly believe that the City of Toronto, Diabetes Canada and our other charitable partners can mutually benefit from a formal partnership, and Diabetes Canada is prepared to offer daily service for all municipal bins that serve your community. At present, it is estimated that more than 102,000,000 kilograms of used textiles are being generated by households in the City of Toronto on a yearly basis. This not only represents a significant amount of material being sent to landfills (more than 85% of used textiles presently goes to landfills), but it is a missed opportunity to generate revenue for critical, life-saving diabetes research.

Diabetes Canada and York University would like to work with the City of Toronto in developing a comprehensive textile diversion program in your municipality. We would like to identify the means and methods to support textile diversion through the placement of textile recycling bins at city arenas, community centres other public spaces and multi-residential sites. Diabetes Canada is uniquely positioned as a recognized charitable brand that has the requisite collection and processing infrastructure to ensure that used textiles are being managed effectively and responsibly (95% of all collected material are reused and or repurposed).

York University has conducted studies that have highlighted how imperative it is for households to recognize who the operator of the bin actually is. “Charity masqueraders” (for profit enterprises that resell textiles) actually discourage household participation, as households are unsure as to what actually happens to their donation. An important element of this is to have clothing bins with municipal branding, indicating an approved charitable partner.
We welcome the opportunity to work with the City of Toronto in developing a sustainable textile diversion program and including your municipality as part of the university’s national textile diversion study (we currently have over 200 municipal partnerships).

Thank you for your kind consideration and we look forward to hearing from you.

Sincerely,

Simon Langer
National Manager, Government and Strategic Partnerships
National Diabetes Trust / Diabetes Canada

Dr. Calvin Lakhan
Lead Researcher, Waste Wiki Project
Faculty of Environmental Studies
York University
Study Excerpt from Phase 2 Textile Diversion Study

In December of 2018, York University undertook extensive household survey testing/questionnaires pertaining to attitudes towards textile waste, clothing donation bins and factors affecting bin utilization.

This study was seen as the conceptual follow up to the Fall 2016 study conducted by the university, which was originally designed to identify the primary determinants to textile donations and explore possible impediments/barriers to participation.

Salient findings from the 2016 study include:

1) Unlike other waste streams, convenience is not the most significant predictor of household participation (while not the most significant predictor of household participation, it is still an important predictor that should be taken into consideration).

2) Unlike other material streams (such as WEEE, or PP&P) households have a “value attachment” associated with their used clothing. As such, households indicated a very strong preference for ensuring that their donations were going to a cause they personally identified with (charitable, social, environmental etc.)

3) The presence of charity masqueraders’ results in significant confusion for households. This confusion was sufficient enough to deter household participating in diversion activity *Note: While there is no formal definition for what constitutes a charity masquerader, these are often operators who deceptively brand themselves in a way to suggest that they are a charity, without being transparent regarding the destination of the material or what is being done with the proceeds from the donation. Numerous communities across Canada have expressed concerns surrounding the presence of 3rd party bins, as they often do not adhere to regular service schedules or bylaw licensing requirements.

With these findings in mind, York University, in collaboration with Diabetes Canada and a coalition of charitable actors, partnered with municipalities across Canada to launch the first municipal textile donation program.

The underlying premise of this program is that municipalities would designate preferred textile collectors within the community (often through municipal branding on bins, or some other
form of official recognition), which clearly communicated to residents that “approved collectors” were adhering to best practices in funding transparency, accessibility and service standards. The intent of this municipal vetting process was to reduce consumer uncertainty regarding both the collector of the material, and the destination of the donation.

Phase 2 of this study wanted to gauge how (if at all) household attitudes towards textile donation have changed, particularly in light of the formal municipal programs being offered in communities across Canada.

Study design
Three broad geographic regions were selected on the basis of relative population distribution, proximity to existing (both branded and unbranded bins) and overall population densities to reflect medium – large urban markets.

These groups were selected on the basis that they provide an adequate geographic representation of the province, and provide the greatest opportunity to interview the broadest cross section of both sociodemographic and socioeconomic groups.

These groups included:

1. Large Urban (Toronto, Brampton, Mississauga, York Region)
2. Urban Regional (Ajax)
3. Medium Urban (Barrie)

Survey questions were organized into four main areas: (1) Awareness/Attitudes (2) Accessibility; (3) Motivation for use and (4) demographic information related to age, ethnicity, education and income.

Questionnaires were pre-tested and refined prior to conducting the official survey. The pre-test allowed for wording refinements and changes to the ordering of the questions. The finalized survey was conducted over a four week period beginning in the second week of December 2018 and running through January 2019. Teams of two enumerators and one site supervisor were sent to each municipality for a period of four days each, spending 6 h at each survey site.
Questionnaire “booths” were set up in spaces with high foot traffic (namely malls, arenas and public commons areas). Enumerators were asked to approach members of the public, explain who they were and the purpose of the study, and requested approximately 10–15 min of the participant's time to complete the survey. A five dollar Tim Horton’s Café and Bake shop gift card was used to incent participation.

A mix of convenience and quota sampling was employed to ensure that survey participants reflect the relative proportions of Ontario’s population. Survey responses were recorded by hand and later electronically archived and analyzed using Provalis Word Stat, Microsoft Excel and Microsoft Word.

A total of 901 responses were successfully recorded (out of 2422 approached) for a response rate of 37.2%

Generally speaking, Likert scales using ordinal ranking were used to classify survey responses.

It is important to note that the data gathered from our surveys is based on self-reported behavior, and not observed behavior. Self-reported measures of environmental awareness and participation tend to be overstated. This phenomenon is known as the value action gap.

A summary of select survey results are shown below.

Levels of Participation and Motivators for Participation
Figures 1 through 4 below summarize household responses regarding self-reported levels of textile donation and stated motivators for participation
Fig 1.

![Bar chart showing participation in textile donations programs.](image1)

I regularly participate in textile donations programs in my community" (At least once every three months)

<table>
<thead>
<tr>
<th>Strongly Agree</th>
<th>Agree</th>
<th>Neither Agree or Disagree</th>
<th>Disagree</th>
<th>Strongly Disagree</th>
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<td>14%</td>
<td>23%</td>
<td>31%</td>
<td>26%</td>
<td>6.00%</td>
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</table>

Fig 2.

![Bar chart showing present participation in textile diversion.](image2)

How do you presently participate in textile diversion?

- Donation to Local Salvation Army/Thrift Store: 22%
- Hand me downs to relatives/friends: 41%
- Clothing Donation Bins: 27%
- Curbside Pickup (Arrange with a collector): 3%
- Other: 7%
Consistent with the findings from the 2016 survey, surveyed households report participating in textile donation to some degree (at least once every three months), with the most popular reuse method being “hand me downs” to relatives and friends. The primary motivator for making a donation was rooted in altruistic motives “helping less fortunate”, or providing assistance to members of a broader kinship network.
Of note, donations made to a clothing drop off bin or a physical retail site accounted for approximately half of all used textiles reported by our respondents.

**Credibility and Awareness**
The majority of survey respondents indicated that having “municipally approved branding” (on clothing donation bins, in the store etc.) would directly incent participation, by reducing uncertainty regarding the operator and destination of donated material (as shown in figures 5 and 6).

More than 65% of all respondents strongly agreed (or agreed) that municipally branded bins would encourage them to donate more, while 60% of all respondents felt that municipal branding reduced uncertainty. As noted in the 2016 study, uncertainty regarding what happens to a donation is sufficient to discourage diversion behavior, as households want to feel that their donations are being used in a socially, environmentally and economically responsible way.

Fig 5.
Of note in figure 7, households still have extreme difficulty distinguishing between charitable and non-charitable bins, exacerbating the confusion and frustration on the part of the consumer regarding who are legitimate collectors, and who are charitable masqueraders. This ultimately impedes household participation in textile diversion initiatives, as shown in Figure 8.
Fig 8.

I would make a donation without knowing about what happens to the clothing after

<table>
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<tr>
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<th>Neither Agree or Disagree</th>
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</thead>
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<td>8%</td>
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Responsibilities of Municipalities and Retailers in educating the public about textile diversion

Perhaps the most salient finding from the follow up study is that households feel that both the retailer (steward selling the clothes) and municipalities bare a shared responsibility in educating households about what to do with textiles at end of life (as shown in figures 9-10)

Fig 9.

Retailers should play a role in educating me about what to do with my clothing at its end of life

<table>
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<tr>
<th></th>
<th>Strongly Agree</th>
<th>Agree</th>
<th>Neither Agree or Disagree</th>
<th>Disagree</th>
<th>Strongly Disagree</th>
</tr>
</thead>
<tbody>
<tr>
<td>Percentage</td>
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<td>34%</td>
<td>8%</td>
<td>20%</td>
<td>12%</td>
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I would make a donation without knowing about what happens to the clothing after
Fig 10.

Lack of Access/Opportunity
Despite efforts on the part of both municipalities and clothing collectors, majority of survey respondents indicated that they did not have readily available access to clothing donation bins (or other drop off points) in their neighborhoods.

This suggests that clothing collectors continue to work with municipalities in placing collection points in high density, well trafficked areas to maximize access for the public.

Fig 11.