

Textile Waste Diversion and Reduction Initiatives

Date: February 13, 2020

To: Infrastructure and Environment Committee

From: General Manager, Solid Waste Management Services

Wards: All

SUMMARY

The City's Long Term Waste Management Strategy, adopted by City Council in July 2016, recommends the development and implementation of a Textile Collection and Reuse Strategy (Textile Strategy) to divert more textile material from landfill. This report provides an update on the City's current Textile Strategy including planning and implementation activities undertaken to date and maintenance and monitoring activities that will be used to measure outcomes of the implemented Textile Strategy. The report also includes an overview of the City's 2019 Clothing Drop Boxes bylaw review, including key bylaw amendments and implementation actions. Finally, the report summarizes next steps that Solid Waste Management Services and Municipal Licensing & Standards will work jointly on in order to further promote the reduction of textile waste both through the Textile Strategy and Clothing Drop Boxes bylaw.

This report was prepared in consultation with Municipal Licensing & Standards and Environment & Energy.

RECOMMENDATIONS

The General Manager of Solid Waste Management Services recommends that:

1. The Infrastructure and Environment Committee receive this report for information.

FINANCIAL IMPACT

There are no immediate financial implications resulting from this report.

The General Manager of Solid Waste Management Services confirms that there are no financial implications resulting from the recommendations included in the report in the current budget year or in future years.

DECISION HISTORY

At its meeting on July 16, 17, and 18, 2019, City Council adopted Item MM9.21 titled "Diverting Textiles from Toronto's Waste Stream", which directs the General Manager, Solid Waste Management Services to develop an implementation plan for a City-wide textile waste diversion program, in consultation with potential providers, and report back to the Infrastructure and Environment Committee in the first quarter of 2020.

The City Council Decision document can be viewed at:

<http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2019.MM9.21>

At its meeting on June 18 and 19, 2019, City Council adopted Item GL5.3 titled "Clothing Drop Boxes By-law Review".

The City Council Decision document can be viewed at:

<http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2019.GL5.3>

At its meeting on July 23, 24, 25, 26, 27, and 30, 2018, City Council adopted Item PW31.10 titled "Options to Address Single-Use Items, Misleading Advertising, and Textile Waste in the City of Toronto".

The City Council Decision document can be viewed at:

<http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2018.PW31.10>

At its meeting on April 11, 2018, the Public Works and Infrastructure Committee directed the General Manager, Solid Waste Management Services to report to the Public Works and Infrastructure Committee at the July 10, 2018 meeting on the ability of the City of Toronto to require retailers of textile material in the City to post reuse, recyclability and waste disposal options at the point of purchase. The City Council meeting of April 24, 25, 26, and 27, 2018, adopted this item PW28.8 titled "State of Toronto's Blue Bin Recycling Program".

The City Council Decision document can be viewed at:

<http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2018.PW28.8>

At its meeting on July 12, 13, 14, and 15, 2016, City Council adopted Item PW14.2 titled "Final Long Term Waste Management Strategy", and adopted the recommended options and implementation plan, as presented in Attachment 1 to the report (June 2, 2016) from the General Manager, Solid Waste Management Services.

The City Council Decision document can be viewed at:

<http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2016.PW14.2>

COMMENTS

The City's Long Term Waste Management Strategy recommended a Textile Strategy to divert more textiles from landfill. This includes the development of a textile diversion awareness campaign and the provision of increased diversion opportunities following the 5Rs Hierarchy (Reduce, Reuse, Recycling, Recovery, Residual disposal). In 2016, the Long Term Waste Management Strategy estimated that a Textile Strategy could potentially divert up to an estimated 15,000 tonnes of textile waste from landfill per year by 2026. The Long Term Waste Management Strategy recommended timing and phases for the Textile Strategy is outlined in Table 1 below.

Table 1 - Table 1: Long Term Waste Management Strategy Textile Strategy timing and phases

Year	Project Phase
2017	Planning Activities
2018	Implementation Activities
2019	Maintenance and Monitoring

Planning Activities

Planning activities to date include a review of existing textile diversion activities being undertaken by Solid Waste Management Services, secondary research and analysis of textile waste quantities found in single family and multi-residential waste composition audits. The following activities were conducted to baseline efforts already underway, better understand the opportunities available to reduce and reuse textiles and to begin to identify any strategic partnerships for textile waste reduction and diversion.

Review of existing options for residents to divert and reduce textiles

Solid Waste Management Services staff identified the following options that Toronto residents currently have to divert textiles from landfill:

- Household pickup offered by some organizations (e.g. Diabetes Canada, Kidney Clothes, Ontario Federation for Cerebral Palsy);
- Drop off at thrift retailers (e.g. Salvation Army Thrift Store, Value Village);
- Drop off and resale at consignment stores;
- Takeback programs offered by an increasing number of clothing retailers (e.g. Patagonia, The North Face, H&M, Levi's);
- Online resale and trading (e.g. Kijiji, Facebook Marketplace, thredUP);

- City of Toronto Community Environment Days, held in each ward from April to September (46 events in 2019);
- City-permitted clothing drop boxes;
- Collection events/drives (e.g. at workplaces, in PATH underground walkway); and
- Donation to community agencies (the City publishes a Holiday Wish List where agencies identify items they need).

In addition to the above textile diversion options, residents have many opportunities to reduce their textile waste through reuse, including:

- Shopping at thrift retailers and garage sales;
- Having clothing repaired for free at Repair Café and Clothing Repairathon events, which are held at various venues across the city, including libraries, community centres, farmers' markets;
- Participating in swap events (e.g. organized regularly by Evergreen at the Brick Works, Toronto Tool Library, Dress Responsibly); and
- Renting clothing from brick and mortar or online clothing rental companies (e.g. Rent Frock Repeat, reheart and The Fitzroy).

Initial analysis of waste composition audit findings and development of new audit categories

Solid Waste Management Services (SWMS) regularly conducts waste composition audits of single family homes and multi-residential buildings. The single family audits typically involve auditing 200 households, while the multi-residential building audits typically involve auditing 20 buildings. The same houses and buildings are audited every season over a one to two year timeline. The audit activities include sorting waste into approximately 150 categories and recording weights.

In 2017, SWMS began collecting new and more refined data on textiles from single family residential audits, such as types, quantity and quality of textiles. The "textiles/clothing" category was divided into clothing, footwear, accessories, household textiles and other sub-categories. Auditors further sorted these materials by whether or not they were deemed to be potentially reusable or unusable (i.e. soiled, damaged) in order to identify the quality of potentially divertible textiles. According to 2018 single family audits, nearly 70 per cent of textiles were deemed reusable. This is the first time that textiles were sorted based on quality, so more audits are needed to gather comprehensive data. Multi-residential audit data on the quality of textiles are not yet available.

Based on single family audits conducted between 2012 and 2018, on average, textiles made up 2.1 per cent of total waste (found in garbage, Blue Bin recycling, Green Bin organics) by weight or approximately 16 kg per household per year. Based on multi-

residential audits conducted in 2014-2015, textiles made up 4.2 per cent of total waste by weight or approximately 29 kg/household/year. These results illustrate that textiles make up a relatively small portion of total residential waste. If the City collected and diverted this quantity of textiles, it would increase the residential waste diversion rate by less than one per cent.

The audit results also suggest that in Toronto, most residents are diverting their used textiles through the many channels identified above, such as household pickup, drop off at retailers and clothing drop boxes.

Research on resident textile diversion behaviour

In 2019, a third-party, on behalf of Solid Waste Management Services (SWMS), conducted a survey of approximately 1,000 single family residents and 1,000 multi-residential residents to help inform public awareness of City of Toronto waste programs and assist with enhancing future communications and programs. Survey participants, which were geographically representative of Toronto, were asked questions about their awareness and use of programs, as well as about their waste reduction and recycling behaviour. Table 2 below includes the responses to the following question: Please rank which of the following you are most likely to do with unwanted clothes, where 1 is the most likely, 2 is the second most likely and 3 is the third most likely. Based on average of the single family and multi-residential resident responses, nearly 78 per cent are likely to donate clothes, give them to family or friends, try to sell them or bring them to a swap or put them into storage.

Table 2 - Ranking of actions residents most likely to take to dispose of unwanted clothes

Action residents take to dispose of unwanted clothes	Single family respondent ranking	Multi-residential respondent ranking
Donate them	1 (25.5%)	1 (25%)
Give them to friends or family	2 (23.2%)	2 (22%)
Try to sell them	3 (13.5%)	3 (15.2%)
Put them in the recycling	4 (9.7%)	4 (10.9%)
Put them in the garbage	5 (9.6%)	6 (7.5%)
Try to bring them to a swap	6 (7.5%)	5 (9.5%)
Put them in storage	7 (7.1%)	7 (7.3%)
Unsure	8 (2.2%)	8 (1.5%)
Other	9 (1.7%)	9 (1%)

Secondary research on reuse and recycling of textiles

As part of planning activities, research was completed on the current textile reuse market, as well as current and potential textile recycling technologies and markets with the review of reports, a jurisdictional scan of textile diversion policies and programs in comparable and/or innovative municipalities (refer to Attachment 1 for the jurisdictional scan) and attending various conferences, such as the Textile Recycling Symposium in 2017 and WEAR (World Ethical Apparel Roundtable) in 2017 and 2018.

In 2017 students at the University of Toronto Munk School of Global Affairs and Public Policy department conducted research on textile diversion on behalf of Solid Waste Management Services (SWMS). The students' jurisdictional scan of government programs and private sector organizations involved in textile diversion revealed a significant lack of publicly available data on the destination and end use of textiles. Their research noted a lack of mechanisms and regulations to track downstream use of collected textiles. The student group's research on municipal textile diversion programs in Canada, the U.S. and Europe revealed that the programs often involve partnerships, particularly with charities, and that there is no shortage of potential partners. However, many jurisdictions have not implemented policies to regulate and monitor such partnerships.

Further research conducted by SWMS staff confirmed that data on post-consumer textile waste at the provincial and national level is very limited and estimates vary substantially between different sources. However, large textile collectors, such as The Salvation Army Thrift Store and Value Village, report that while up to 50 per cent of collected textiles end up for sale in local thrift stores, only about 25 per cent are sold. As a result, approximately 75 per cent of locally collected textiles end up at sorter-graders, which typically ship about 50 per cent of textiles to reuse markets primarily in Africa, Asia, Europe, or Central and South America. The overseas market for textiles has been quite lucrative for graders and exporters however, like any market, it is vulnerable to sudden changes, which could have dramatic effects on textile commodity pricing. The remaining 25 per cent of locally collected textiles are unfit for reuse and are repurposed into other products, such as rags, insulation, soundproofing and carpet padding. This reprocessing often takes place overseas as the infrastructure and markets for shredded textiles in Canada is currently very limited. Despite the lack of domestic capacity to manage the volume of post-consumer textile waste produced locally, technology and markets for shredded textiles are emerging in Canada, with increasing support from certain sectors like apparel, automotive and construction.

It is estimated that less than one per cent of Canadian post-consumer textile waste is truly recycled, which is when textiles are chemically deconstructed into fibres to be used to make new textiles. True recycling is very rare since not all fibres can be recycled in a closed-loop recycling process, the markets are extremely limited and the costs far outweigh manufacturing with virgin fibres. Unlike commonly recycled products (e.g. cans and bottles), textiles have a reuse value that is much higher than the raw fibre state they could be deconstructed into, given the current technology.

Textile diversion data from Community Environment Days

Since 1993, Toronto residents have had the opportunity to bring textiles and household goods to Community Environment Days for donation. From 1993 to 2015, the City partnered with Goodwill to collect textiles and various other household items for reuse. Since 2016, textiles and household goods have been collected by The Salvation Army Thrift Store at Community Environment Days. Data does not exist from 1993 to 2002 for materials collected. Since 2003, over 1,400 tonnes of textiles and household goods have been collected at Community Environment Days.

In 2019, Solid Waste Management Services and The Salvation Army started collecting textile specific data at Community Environment Days by weighing textiles separately from other reusable items, such as books, small household items and sporting goods, brought to the events. In 2019, over 18.5 tonnes of textiles were collected at Community Environment Days representing nearly 25 per cent of all reusable items collected by weight at these events.

Clothing swap pilot at City Hall and participation in public swap events

For Waste Reduction Week in 2016, Solid Waste Management Services (SWMS) operated a clothing swap pilot at City Hall for City of Toronto staff to determine if and how the City could facilitate swaps. In November 2016 and April 2017 SWMS staff attended the biannual "Drop, Swap & Shop" event at Evergreen Brick Works to observe and learn from the popular swap, while conducting public outreach on the City's waste diversion and reduction programs. During the "Drop, Swap & Shop" event in November 2016, 8,826 items, mostly clothing, were swapped at the event. SWMS recognizes that independent and community-led swap events, which have become increasingly popular in Toronto over the last several years, play an important role in waste reduction and reuse and is considering how best to support them.

Review of educational resources and information to residents on how to reduce and reuse textiles

The City has long promoted the reduction and reuse of textiles through various communication channels (e.g. website, annual waste calendar, regular advertising campaigns, etc.). Following the adoption of the Long Term Waste Management Strategy, SWMS staff identified opportunities for further public education. For example, the reach of the webpage 'toronto.ca/reuseit' could benefit from increased promotion along with including more information on how to shrink one's clothing footprint. A need for a mobile app with some of this information was also identified.

Implementation Activities

In order to further develop the Textile Strategy, implementation activities started in 2017 and continue a community-first approach, including enhancement of existing activities, such as new communications campaigns and the formation of new service delivery partnerships.

Founding Steering Committee Member of Ontario Textile Diversion Collaborative

Solid Waste Management Services (SWMS) staff participated in a multi-day Textile Diversion Lab with various stakeholders in the fall of 2017, which led to the formation of the Ontario Textile Diversion Collaborative (OTDC) in 2018. The OTDC is a multi-stakeholder group comprised of over 40 stakeholders including textile collectors, non-profits, charities, retailers, brands, academics and municipalities. The group is co-led by the not-for-profit organization Fashion Takes Action and a professor from Seneca College. SWMS, is a founding Steering Committee member, along with the Salvation Army Thrift Store, Value Village, Diabetes Canada, Retail Council of Canada, Partners in Project Green, Scout Environmental and the City of Guelph. To date, the OTDC has been funded by the Ontario Trillium Foundation's Collective Impact grant. The OTDC works to find solutions to reduce and divert pre and post-consumer textiles from disposal through these four key areas:

Data/Research: The OTDC has standardized textile categories in audits to gather more detailed and comparable data from municipalities and textile collectors. The objective is to obtain and analyze data from various stakeholders on the quantity, type and destination of textiles collected to better understand the issue of textile waste on a municipal, provincial, national and global scale.

Policies/Regulations: The OTDC has researched textile-related policies and regulations to better understand the barriers and potential solutions to textile diversion. This research led to supporting the efforts of the Canadian Apparel Federation and Retail Council of Canada to revoke Ontario Regulation 218/01: Upholstered and Stuffed Articles, which prohibited the use of second-hand material as stuffing in the manufacture of an upholstered or stuffed article. The OTDC is currently seeking to amend the portion of the Federal Duty Drawback Program that provides a refund ("drawback") of customs duties to businesses/importers for imported goods that become obsolete or surplus if they are destroyed (e.g. incinerated or landfilled) or exported. The purpose of this program is to assist the Canadian industry to compete by reducing costs on goods that will not enter the domestic market, however the program allows businesses to dispose of textiles as garbage, which consequently results in items not being reused or recycled.

Recycling Industry: Through researching the current state of textile recycling (e.g. infrastructure, technology, markets), working with academics and engineers to develop prototypes, and piloting programs with various manufacturing sectors (e.g. buildings, furniture, automotive), OTDC is exploring the feasibility and business case to develop a local textile recycling industry.

Communications: Given the public confusion on the disposal of unwanted textiles, the OTDC has been working to develop consistent public messaging on textile waste. Information about the OTDC public awareness campaign can be found on the following page. In addition to the campaign, the OTDC regularly communicates with and learns from municipalities and textile-related organizations across the country and beyond. In April 2019 the OTDC organized a Textile Diversion & Recycling Symposium in order to facilitate communication and knowledge exchange.

In addition to being a member of the OTDC Steering Committee, SWMS is also a member of the OTDC Data/Research and Communications Working Groups.

Additional and enhanced communications on textile waste reduction and diversion opportunities

Based on the review of textile-related communications undertaken by SWMS staff, additional information was added online to toronto.ca/reduce-reuse, where residents can learn ways to reduce textile waste and other approaches to shrink their clothing footprint (e.g. repurposing, swapping, borrowing, repairing, and shopping consciously). The list and map of non-profit organizations that accept donations has been thoroughly reviewed and updated, including the addition of organizations. The list currently consists of 65 organizations that accept various items for reuse. This information was also included as one of the key features of the [TOwaste App](#), which was launched in September 2018. The categorized list of organizations is not a City endorsement but is provided to inform residents of the many organizations in the city that accept donations of textiles and other items.

Since the adoption of the Long Term Waste Management Strategy, the Waste Wizard search tool has also been revised to encourage residents to donate certain waste items that are flagged in the tool before being instructed on which waste stream (e.g. garbage, Blue Bin recycling) the item should go into, if donation is not possible. SWMS regularly runs campaigns to inform and remind residents about Waste Wizard, the TOwaste App and resources on toronto.ca/reuseit (refer to Attachment 2 for sample reuseit ad).

Based on research that indicates that the majority of textiles are reused, not recycled, as well as increasing contaminants, such as textiles, found in the Blue Bin, the City's communications intentionally do not associate the terms "clothing/textiles" and "recycling", which is often used interchangeably with the Blue Bin program.

Implementation of awareness campaign

In line with the Long Term Waste Management Strategy's recommendation to develop a textile diversion awareness campaign, SWMS worked with other OTDC members, various stakeholders and a creative agency on a campaign to raise awareness about textile waste and encourage residents to donate their clothing and other textiles, instead of throwing them in the garbage. In 2019, the City ran the "Give Clothes a New Life" campaign for four weeks utilizing digital ads as well social media, including Instagram influencers. The ads directed people to otdc.co and toronto.ca/reuseit to learn more (refer to Attachment 3 for sample ads and influencer posts). The "Give Clothes a New Life" campaign was further promoted at an OTDC event with the Lieutenant Governor on October 29, 2019.

The campaign had strong engagement overall, with an average click-through rate of 0.41 per cent (anything over 0.10 per cent is considered excellent). The engagement rate (based on likes, comments, shares etc.) of the Instagram influencers' textiles campaign posts was higher than their average engagement rate for their Instagram posts overall. The City of Toronto's ad campaign contributed to an estimated 25,000 visits to the OTDC website.

Textile Strategy community and public engagement events

Following a successful clothing swap for City of Toronto staff at City Hall during Waste Reduction Week in 2016, SWMS worked with the Recycling Council of Ontario to host a public clothing swap on Nathan Phillips Square during Waste Reduction Week in 2017. Over 300 people participated, approximately 280 kg of textiles were brought to the swap and 877 items were swapped. The remaining items were collected for reuse. See event photos in Attachment 4.

In November 2016, SWMS organized a screening of *The True Cost*, a film about the impacts of fashion on people and the planet. Clothing donations were collected at the event and, following the film, residents had an opportunity to hear about the City's role in addressing textile waste.

In September 2018, SWMS partnered with volunteer organizers of Secondhand Sunday, which is a community reuse day when residents leave any unwanted, reusable items, including textiles, on their property next to the sidewalk or curb for their neighbours and community to take for free. Based on the success of the September 2018 pilot in several Toronto neighbourhoods, SWMS continued offering its in-kind support for the April and September 2019 Secondhand Sunday events.

During Waste Reduction Week (October 21-27, 2019), SWMS worked with Partners in Project Green, which partnered with Diabetes Canada, to host a Clothing Collection Drive at City Hall and Metro Hall. Textile collection boxes were available in City Hall and Metro Hall from October 21 to 25 for City staff and members of the public to bring clothing and other items like accessories, footwear and home textiles (e.g. blankets, sheets, towels). A total of 407 kg of textiles was collected from City Hall and Metro Hall.

Launch of Sewing Repair Hubs in City's Neighbourhood Improvement Areas

In 2018, SWMS, together with the Social Development, Finance & Administration Division and several community agencies, launched four Sewing Repair Hubs, as part of the City's Community Reduce & Reuse Programs. The Programs are funded as part of the Long Term Waste Management Strategy implementation. Not only do they support the City's waste reduction and diversion goals, but they also align and support the City's Poverty Reduction Strategy and other initiatives such as the Toronto Strong Neighbourhoods Strategy. The Sewing Repair Hubs operate on a community hub-based model located in multi-residential building clusters within Neighbourhood Improvement Areas. The Sewing Repair Hubs provide Do-It-Yourself (DIY) workshop spaces to promote a culture of repair and reuse of clothing and other textiles, thereby reducing the amount of textiles discarded each year.

Program activities include regular instruction on the basics of alterations and repairs and opportunities to make and design clothes from repurposed textiles. For example, Weston Sewing Repair Hub participants repurposed donated Air Canada pillowcases into table cloths and bags. In addition to educating residents about the importance of waste reduction and reuse, the Sewing Repair Hubs create spaces for community members to gather and offer skills training, which could lead to job and economic opportunities. The Sewing Repair Hubs are funded by SWMS and the programs have

been delivered by the following non-profit organizations: Progress Place, Greenest City, Creative Reuse Toronto, Scadding Court Community Centre, Delta Family Resource Centre and Rexdale Women's Centre. As of the end of 2019, there were approximately 1,800 participant visits and nearly 4 tonnes of clothing and other textiles diverted from landfill through the program. SWMS has provided total funding of \$700,000 on Sewing Repair Hubs to date and will continue to fund sewing repair activities in 2020. See photos of the Sewing Repair Hubs in Attachment 5.

Waste Reduction Community Grants Program

The Waste Reduction Community Grants (WRCG) program, launched in 2018, supports innovative community-based efforts to reduce residential waste and increase participation in the City of Toronto's waste diversion programs. Priority is placed on investing in actions that address multi-residential buildings, multi-lingual communities, equity-seeking groups and Neighbourhood Improvement Areas. The WRCG program supports the Long Term Waste Management Strategy's guiding principles of working with community partners to enhance access to waste diversion programs, increasing public engagement and working together to deliver services.

In 2018, two of the seven organizations awarded grants focused on projects to reduce textile waste, including the development of a clothing swap event planning toolkit and school workshops on sustainable fashion and textile waste diversion. Together the two textile-related projects received \$49,300 in grant funding. The [Swap It Toolkit](#) created by the Recycling Council of Ontario, was released on "Textiles Tuesdays" of Waste Reduction Week in October 2019.

Stonegate Community Association, a 2019 WRCG recipient, is developing a textile repair clinic and classes, as well as workshops to repurpose textiles, among other programs to reduce waste and increase diversion. Youth Empowering Parents, another 2019 WRCG recipient, is developing online tutorials, resources and activities to assist youth in teaching newcomer parents and their families about effective waste management practices, including repair, reuse and repurposing of clothing.

Maintenance and Monitoring Activities

Ongoing maintenance and monitoring of the City's comprehensive Textile Strategy will include:

- Research and data collection to measure impacts and outcomes of activities that have been implemented;
- Promotion and education to ensure ongoing public education on options for managing and diverting textiles from landfill; and
- Community engagement to offer opportunities for events, workshops and grants while supporting existing community efforts.

Table 3 includes details on the ongoing maintenance, measurement and potential future outcomes of the Textile Strategy. Refer to Attachment 6 for Table 3. Monitoring and

maintenance of activities will continue throughout 2020 and will be re-evaluated during the 5-year review of the Long Term Waste Management Strategy.

Update on Consideration for Retailers of Textile Material to Post Reuse, Recycling and Waste Disposal Options at the Point of Purchase

A report titled "Options to Address Single-Use Items, Misleading Advertising, and Textile Waste in the City of Toronto" (PW31.10) - that Toronto City Council considered at its July 2018 meeting - provided information on the City's ability to require retailers of textile material to post reuse, recycling and waste disposal options at the point of purchase. As stated in that report, the City has at least two options to increase textile diversion awareness among consumers through posting of information at the point of purchase: voluntary or mandatory. The City could ask retailers to voluntarily place signage to indicate reuse, donation, or proper disposal options for textile materials at the point of purchase. As well, incentives could be used to bolster voluntary efforts. This approach will be further considered in the Textile Strategy in the future following the five year review of Long Term Waste Management Strategy.

Alternatively, City Council could enact a bylaw requiring Toronto retailers to post information in their retail establishments. However, prior to enactment, Council should want to consider whether the bylaw relates to a municipal issue such as climate change, local environmental, economic, health and/or public welfare. Moreover, Council would need to provide sufficient notice and opportunity for public input.

Other considerations for a retailer signage program include program administration and enforcement, definition of "retailers of textile material" and the City's inability to regulate online purchases. In addition to these considerations, attention would need to be given to the fact that the signage would include information about City of Toronto programs, which may not apply to residents living outside of Toronto as disposal options vary between cities. Given all these considerations, the City could consider making a request to the Province to require all businesses and online retailers to post reuse, recycling and waste disposal options at the point of purchase to ensure consistent messaging and prepare for potential Extended Producer Responsibility legislation for textiles.

Additional City-Related Textile Diversion Initiatives

Over the last few years the City of Toronto's Environment & Energy Division helped promote Earth Month clothing collection drives in schools, run by textile-collecting organizations, as part of its publicity of the annual Clean Toronto Together campaign. The 2017 clothing drive organized by Diabetes Canada collected nearly 21 tonnes of textiles from 44 schools. In 2018 and 2019, the City partnered with Bag2School, the Toronto District School Board's approved textile collection vendor. In 2018 107 Toronto District School Board (TDSB) and 9 Toronto Catholic District School Board (TDCSB) schools collected over 53 tonnes of textiles. In 2019, 118 TDSB and TDCSB schools collected nearly 57 tonnes of textiles. Bag2School, which ships and sells used clothing overseas, pays schools based on global market prices for used textiles.

Update on Clothing Drop Boxes Bylaw Review and Implementation

There are three bylaws that govern clothing drop boxes in Toronto: City of Toronto Municipal Code Chapter 545, Licensing, Chapter 629, Property Standards, and Chapter 395, Clothing Drop Boxes. These bylaws regulate the safety and maintenance of clothing drop boxes. In 2019, the Municipal Licensing & Standards (MLS) Division conducted a review of the bylaws to improve the safety and maintenance of clothing drop boxes and enhance tools for enforcement. The purpose of the bylaws is to regulate the use of clothing drop boxes and the bylaws do not regulate the activity associated with the boxes (e.g. what the collected textiles are used for), however Solid Waste Management Services (SWMS) recognizes their connection with the Textile Strategy. SWMS participated in the bylaw review by attending the public and stakeholder consultation events, as well as providing feedback on the consultation questions and the textile waste diversion section of the staff report. During consultation, clothing drop box operators and charities indicated a willingness to share data on their clothing drop boxes, to inform SWMS' Textile Strategy.

In June 2019, City Council adopted a series of recommendations to amend the Clothing Drop Boxes Bylaw, including:

- Licensing all clothing drop box operators, including charitable operators, to help promote a greater level of accountability;
- Requiring clothing drop boxes to be placed on a site that has lighting at all times, to help ensure public safety;
- Requiring operators to label each box with a pick-up schedule to help manage potential issues such as overflowing;
- Requiring permit applicants to provide a statement from a third-party professional engineer, stating that the engineer has reviewed the design of the box, considered the potential safety risks, and determined that the box appropriately mitigates potential injury;
- Enhancing enforcement tools and an improved enforcement strategy to address unpermitted and/or unsafe clothing drop boxes; and
- Developing an online map of permitted drop box locations which may be used to inform the public, and to identify which drop boxes are operated by a charity, community organization, religious institutions or businesses.

The amended bylaw, Chapter 395, Clothing Drop Boxes came into effect on October 1, 2019, and was supported by communications to Councillors, stakeholders, and the public. The campaign included promotion of the new online [map](#) of permitted clothing drop box locations on Open Data, indicating who operates the boxes and whether they are a non-profit or for profit entity. SWMS has helped promote the map by adding links to it online at toronto.ca/reuseit. The map will make it easier for the public to locate permitted clothing drop boxes in the city and learn about who operates and benefits from them. MLS is currently working with Technology Services Division staff to improve

the clothing drop box map and develop additional tools to improve user-friendliness, such as easy search/filter and colour coding.

Based on a City Council request, MLS staff worked in consultation with charities and other stakeholders to investigate clothing drop box permit labels to better differentiate boxes operated by charities and for-profit organizations. As of October 2019, permit stickers issued for boxes operated by charitable and non-profit organizations are yellow and those issued to for-profit operators are orange. There are over 600 City-permitted clothing drop boxes across Toronto. Approximately two-thirds are operated by non-profit operators, while one-third are operated by for-profit operators. MLS continues to work on bringing operators into compliance and implementing process and operational changes to support the bylaw changes.

Next Steps

Continuation of Data Collection & Stakeholder Collaboration

SWMS continues to gather data from waste audits and textile diversion and reduction activities, conduct secondary research and participate as a member of the OTDC. These activities will help inform the City's future textile-related programs and communications.

Mobile and Neighbourhood Drop-Off Depots

One of the recommendations of the Long Term Waste Management Strategy is to develop 'Mobile Drop-off Depots' and a network of permanent 'Neighbourhood Drop-Off Depots' to make diversion of textiles and other items more convenient, particularly for residents in multi-residential housing who may not have access to a vehicle. SWMS will begin exploring feasibility, potential models and partnerships.

Clothing Drop Boxes

SWMS and MLS staff will work together, with the support of the Environment & Energy Division, on increasing public awareness of the existing Clothing Drop Boxes bylaw. In particular, the two divisions will develop a joint education campaign to increase promotion of the online map of permitted drop box locations.

The City's Textile Strategy will be reviewed as part of the forthcoming 5-year review of the Long Term Waste Management Strategy, which will consider environmental, social and economic impacts. Plans and activities may shift based on this review.

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SIGNATURE

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ATTACHMENTS

Attachment 1: Jurisdictional scan of textile diversion and reduction policies and programs in comparable and/or innovative municipalities

Attachment 2: Reuse It Campaign Sample Ad – Fall 2016 and Fall 2017

Attachment 3: Give Clothes a New Life Campaign – Fall 2019 - Sample Ads

Attachment 4: Textiles Tuesday Pop-Up Clothing Swap – October 2017

Attachment 5: Sewing Repair Hubs

Attachment 6: Table 3 - Summary of current activities, measurement of activity impacts and potential future outcomes