



December 12 2023

Toronto City Council
City Hall, 100 Queen Street West
Toronto, ON M5H 2N2
By email: councilmeeting@toronto.ca

Re: IE 9.3 Update and Action Plan on the Single-Use and Takeaway Items Reduction Strategy, including the Circular Food Innovators Fund

To Mayor Chow and members of Council,

On behalf of TEA and Reusable Toronto, we urge you to move forward quickly with the Single-Use and Takeaway Items Reduction Strategy and vote in favour of the staff recommendations, and amendments made at the Infrastructure and Environment Committee.

The Toronto Environmental Alliance has been advocating for zero waste policies and programs for over thirty years. Reusable Toronto is a network of community groups, businesses, researchers and reuse champions that want to move our city away from wasteful single-use disposable items and towards waste-free, safe reusable alternatives.

Overall, we feel the proposed strategy is moving in the right direction to address single-use and takeaway items. We support the strategy, and the commitment to continue to go further.

We agree with the staff recommendations and amendments made to improve the strategy made at the Infrastructure and Environment Committee, including:

- 1) Moving to phase 2 of the strategy with requirements for businesses to ‘ask-first’ before giving out single-use items, and allowing customers to bring their own cups and bags.** The staff report, as well as recent research by UofT has shown that the majority of businesses are comfortable with these regulations, and this will immediately avoid unnecessary single-use items and save money for businesses who don’t have to buy them.
- 2) Developing phase 3 regulations to require reusable cups and dishes for dining-in at restaurants and reusables at large venues.** Requiring reusable cups and dishes for dine-in is a simple, back-to-basics regulation that can immediately reduce unnecessary disposables. Reuse dine-in requirements have already been implemented across France (including fast food chains like McDonald’s) in Edmonton (which requires that all restaurants provide reusable cups for on-site drinks), and many other cities. Major event venues like stadiums and concert halls have reusable cups in Germany, Belgium and major concert promoters are rolling out reusable cups in their venues. The experience in these other jurisdictions shows that it’s not a question of *if* it’s possible here, but how to roll it out in Toronto.

- 3) **Developing a plan for the City to lead by example and adopt single-use reduction policies and reusable alternatives in City-run and City-owned facilities.** There is a great opportunity to model and lead by example in the many services and facilities operated and funded by the City, and to support the many businesses and vendors that operate on City property, such as the Zoo, Union Station, St Lawrence Market and restaurants in parks. This will not only demonstrate a real commitment, but support a strong circular economy in Toronto.
- 4) **Providing support for small businesses including funding support, training and promotion support to help them adopt new approaches.** City consultation reports, and local research confirms that Toronto's businesses are interested and ready to adopt new approaches to reduce waste, however they need clear guidance and support. Small grants, training and promotion support provided by the City will be critical to helping Toronto's independent businesses thrive.
- 5) **Reporting back as soon as possible with a plan to prohibit single-use plastic items covered by the now-uncertain federal ban.** Staff reports confirm that there is strong support for regulations to prohibit the worst single-use plastics, and research shows that most businesses in Toronto had already taken steps to prepare for a federal ban, which is now in question after a court challenge and subsequent appeal. Municipalities across Canada have already passed their own local bans on these plastics, and Toronto should do the same.

Moving forward with the staff recommendations, and the above amendments, will have a big impact in the short term, and set us on a course for long term impact.

In the attached background document, we've provided more details on our research and our key recommendations for this strategy. These recommendations are based on the results and consultation work done by Toronto staff over the last 5 years on this, on research conducted by the University of Toronto Trash Team with TEA over the last three years, and examples from around the world where different approaches to reduce unnecessary single-use items and to shift to reusables are already in place, and working.

We are pleased to see continued strong public support for the City to take action to reduce single-use items. TEA and Reusable Toronto launched an email petition in November, and as of today, more than 1000 emails have been sent to the Mayor, the Chair of IEC, and to every council member, urging you to move forward with a single-use strategy that includes a focus on reusables (Copy of letter attached).

We hope to see Council move quickly on this strategy and maintain this momentum. We look forward to future reports and plans that outline a plan to require reusables, that apply regulations equally to the largest venues and businesses in our city, and provide support to help small businesses adapt.

Sincerely,



Emily Alfred, Waste Campaigner, Toronto Environmental Alliance

Attachment 1: TEA and Reusable Toronto email action to Toronto Council

Attachment 2: TEA and Reusable Toronto - Council background document

Attachment 1:

Toronto Environmental Alliance and Reusable Toronto email action to Toronto Council

Email submitted by more than 1000 Toronto residents

Subject: We need more reuse, and less single-use

Dear Mayor Olivia Chow and Deputy Mayor Jennifer McKelvie

I am concerned about the growing problem of single-use plastic and the impact it has on our health and the environment. We can't recycle our way out of this problem and switching to other disposable materials isn't a solution. We need to make a real shift away from wasteful single-use and focus on reuse.

I want Toronto to follow the lead of other jurisdictions in Canada and around the world and pass policies that will help local restaurants and food businesses shift from harmful single-use disposables to reusable alternatives.

I support TEA and Reusable Toronto's call for action, and I urge you to:

- 1) Move quickly on an 'ask-first' regulation to reduce unnecessary accessory foodware*
- 2) Help reduce takeout foodware waste by requiring acceptance of customer-cups*
- 3) Make a plan to require restaurants to provide reusable cups and foodware for dine-in orders*
- 4) Make a plan to require reusable cups and foodware at venues and events*
- 5) Support reusable, returnable takeout programs*
- 6) Follow through on your commitment to lead by example and shift to zero-waste reusables in City facilities*
- 7) Support small restaurants with training and microgrants to adopt reusables*

Local research shows that Toronto restaurants are ready to reduce waste, and seeking guidance and support from the City on how best to adapt to new federal plastics bans. Now is a critical time to reduce single-use plastics and support businesses in reducing waste, adopting reusable options for take-out and dine-in.

Sincerely

Backgrounder: November 2023

Toronto's Single-Use Reduction Strategy

Prepared by: Toronto Environmental Alliance & Reusable Toronto

Overview

Council will soon vote on the next phase of Toronto's [Single-Use & Takeaway Items Reduction Strategy](#). The Strategy is currently in phase 1, and is intended to reduce unnecessary use of bags and takeout foodware like cups, utensils, containers.

The Strategy has been developed after years of consultation and has overwhelming public support. Local research shows that Toronto businesses are ready to reduce waste and are seeking guidance and support from the City.

A national ban on single-use plastic bags, foam and utensils was slated to start this December, but a federal court challenge by the plastics industry has raised confusion about the future of the ban. This gives greater urgency to Toronto Council to move quickly on the Strategy, and to include local bans on foam, black plastic and bags.

A strong strategy that builds on the successful actions taken in other Canadian cities and internationally can dramatically cut waste and lower costs for Toronto's businesses.

Reusable Toronto and the Toronto Environmental Alliance outline our recommendations for simple, effective regulations that not only discourage single-use items, but promote and advance the alternative: waste-free reusables.

Single-use Strategy context / history

Toronto City Council unanimously passed the [Single-Use & Takeaway Items Reduction Strategy](#) to address the issue of single-use plastic and other items in 2021, after years of consultation with businesses and the public. Currently, the Strategy is in phase 1, focused on education and voluntary measures. There will be a vote on phase 2, which will include regulatory measures, by the end of 2023.

The extensive public consultations in 2018 and 2019 saw record-breaking turnout with overwhelming public support for City Council to take action, including regulations.

Starting this December 20, 2023, the Canada-wide ban on the distribution and sale of certain single-use plastic items (bags, utensils, some plastic containers, and cups) will affect all Toronto food establishments. *Toronto's Strategy complements the federal ban with additional actions that will reduce waste and support small businesses.*

What we want to see

Toronto must move quickly to the next phase of the Strategy and pass regulations. City staff have already consulted the public on regulations which can be passed immediately. In addition, Toronto needs to move forward with reuse regulations that have proven successful elsewhere.

Toronto Environmental Alliance & Reusable Toronto are asking City Council to take the following actions:

Immediately pass local by-laws:

1. Ask-first / Accessories-on-Request - Require that foodservice establishments only provide items like napkins and disposable cutlery after confirming the customer wants them
2. Accept customer-supplied cups, food containers, and bags

Commit to moving forward with reusable foodware requirements / by-laws:

3. Reusables for dine-in - Set a timeline to require foodservice establishments serve 'dine-in' orders on reusable cups and foodware
4. Reusables for events - Set a timeline to require major event stadiums, arenas, and venues provide reusable cups and foodware
5. Reusables for takeout - Develop a timeline to require large foodservice establishments offer reusable, returnable takeout cups and containers

Strengthen City role in Reduction Strategy:

6. Develop comprehensive support for Toronto's small businesses and small foodservice establishments:
 - a) Offer micro-grants for small establishments to assist with adaptation such as installing a dishwasher, purchasing reusable foodware
 - b) Provide training and information sessions, sample policies, signage in multiple languages, training guides for staff, etc
7. Develop a timeline for City facilities, food services and events on City property or funded by the City to adopt reusable cups and foodware as quickly as possible.

What jurisdictions are already using regulations to require reusable foodware?

Accessories-on-request - Required in Calgary, Vancouver, Edmonton; NYC, Chicago, LA and dozens of other jurisdictions.

Accept clean customer-supplied cups - Required in Banff, Edmonton, Oregon, and Spain. A majority (60-75%) of interviewed businesses in Toronto already do this.

Reusable foodware for dine-in - Required in France since January 2023 including all venues and fast food chains. Starts in Banff in Jan 2024, and is required for cups in Edmonton since July 2023. Major international food chains have already switched to reusables for dine-in where regulations exist, including McDonald's.

Reusables at events, venues - Reusable required at events in Banff, California, Germany, Belgium, and a growing number of major stadiums and arenas.

Reusable, returnable takeout cups and containers - German restaurants are required to offer reusable, returnable options for all takeout orders since January 2023. This is encouraged in many jurisdictions including municipal pilot programs in Banff, Seattle, and Vancouver.

Why support reusables over “compostable” single-use items?

Simply switching from one type of disposable (e.g. plastic) to another (e.g. paper, 'compostable', or metal) does not reduce waste and can dramatically *increase* costs for businesses. Toronto's municipal green bin system cannot actually compost the vast majority of “compostable” packaging. This is why we need regulations that go further to stop all unnecessary throwaway items.

This is particularly relevant now as the planned federal ban on single-use plastic prompted many businesses to seek alternative ways to serve food. Toronto By-laws that require businesses to “ask first” before handing out single-use items, or to offer reusable options whenever possible, help businesses to reduce the cost of expensive alternatives.

What are local businesses saying?

The University of Toronto Trash Team interviewed over 200 businesses and visited more than 600 in 7 areas of Toronto between 2021 and 2023 about single-use foodware and their readiness to shift to zero waste reusable alternatives.¹

Researchers found that most small businesses want to reduce waste, are already taking steps to do so, and are seeking guidance from the government, including on foodware choices. A majority of businesses in all areas already allow customers to bring-their-own cup, however they see a role for the City in clarifying safety guidelines and encouraging the practice.

A 2022 survey of customers by the University of Toronto Trash Team found that 89% support a requirement for businesses to provide reusable foodware for dine-in, and 92% think businesses should do more to reduce waste.

Local Economic Benefits of Reuse Regulations

Real life case studies show that swapping disposables for reusable foodware actually saves money in small businesses, chains, and institutions.

The [ReThink Disposables](#) project in multiple US cities worked with hundreds of small businesses that swapped some or all foodware for reusable options. They found that 100% of those that tracked their results saw that they saved money and reduced waste. The project staff noted that most restaurants and kitchens underestimate the amount of money and time they spend on disposables, while most restaurants over-estimate the cost of reusable dishes and time for washing.

The City of Edmonton requires reusable cups for dine-in orders and estimates that businesses save an average of 20 cents per cup. A Quebec study found that serving a coffee in a ceramic mug every day for a year costs less than \$5, including washing, compared to over \$55 for 365 disposable cups, sleeves, lids and waste costs.²

Contact Information:

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¹ Phase 1 and Phase 2 reports available here; <https://uofttrashteam.ca/singleusefoodware/>

² CIRAIG: [rapport technique - analyse du cycle de vie de tasses réutilisables et de gobelets à café à usage unique](#)