

October 24, 2019

Email: [jelford@regina.ca](mailto:jelford@regina.ca)

Dr. Juanita Elford  
Waste Minimization Specialist  
Water, Waste and Environmental Services  
City of Regina

Dear Dr. Elford,

**RE: Single-Use Plastics Reduction**

On behalf of the Retail Council of Canada (RCC), and our members operating in the City of Regina, thank you for the opportunity to begin our discussions on how we can work collaboratively to reduce the use of single-use plastics, including plastic bags in your community.

RCC and our members are not opposed to a plastic bag ban, and a range of other actions specific to other single-use items, however in this document have outlined our comprehensive thoughts on this important issue.

### **About Retail Council of Canada (RCC)**

RCC is a not-for-profit industry-funded association that represents small, medium and large retail businesses in every community across the country. As the Voice of Retail™ in Canada, we proudly represent more than 45,000 storefronts in all retail formats, including department, grocery, specialty, discount, independent retailers and online merchants.

Retail is Regina's largest employer and across Saskatchewan more than 68,000 people work in the province's 4,882 retail stores. Core retail sales (*excluding vehicles and gasoline*) in the province exceeded \$19.5 billion in 2018. Retail Council of Canada (RCC) members represent more than two-thirds of core retail sales in Saskatchewan, and over 90% of all grocery sales in the province.

### **About RCC and Sustainable Issues**

RCC members are not only the frontline face of most consumer facing environmental programs - but are also a vital link in their success.

RCC and its members are extensively engaged in the design and delivery of over 100 waste diversion and EPR programs operating in Canada, including each of Saskatchewan's regulated and voluntary programs. We bring an important depth of experience and perspective to this subject from our work coast to coast to coast. Current stewardship programs cost approximately \$1.6 Billion across Canada.

More specifically, RCC members represent the vast majority (estimated to exceed 90%) of all plastic bags distributed in the City of Regina.

### **Retail Action To Date**

The negative impact of single-use plastics is undeniable, and RCC members have already taken significant action to reduce the distribution of single-use items.

For example, many retailers have instituted fees for checkout bags that have shown to create an immediate reduction of bags distributed. Additionally, most retailers have incorporated best practices to reduce bag use, as well as promoted the use of reusable bags as a better alternative. Further, some national and regional retailers have announced their intentions to phase out single-use plastic bags entirely.

Retailers and manufacturers also collaborate with municipalities to fund 75% - 100% of the blue box system that collects packaging and paper products. Unfortunately, it is less practical to collect soft plastic and small single-use plastics through the blue box and therefore the system is a focus for continuous improvement in many jurisdictions.

Our members also welcomed the June 2019 announcement that the federal government will ban the use of certain single use plastics by 2021. Even though the details still must be worked out in conjunction with stakeholders, RCC is confident that this federal government initiative will create a level playing field for businesses across the country.

Achieving such a nationally harmonized approach could help to avoid customer confusion and improve environmental outcomes. A national approach could also streamline and lower a retailer's operational and cost impacts, which could ultimately result in lower costs for consumers.

### **National or Provincial Coordination Preferred**

RCC and its members strongly prefer the City of Regina work collaboratively with the Saskatchewan government in an effort to take a harmonized approach to borderless issue impacting all Canadians.

A consistent harmonized system creates the best citizen understanding of the waste system, and therefore provides the best environmental outcomes. When government action (especially at the municipal level) is not harmonized with best practices in neighbouring communities or provinces, it also creates additional cost and administrative burden for retailers.

Retail is a very competitive industry and we are reliant upon Government to maintain a level playing-field. A situation where a store on one side of a road is subject to one set of rules, and their competitor on the other side of the street is not, is inherently uneven.

Given that many retailers conduct business in multiple towns, municipalities and provinces, they attempt to create a seamless customer experience through harmonizing procedures. From store layout to

product offerings, pricing and advertising, customers can shop with certainty, knowing that their shopping experience with a chain retailer (including the online experience), will be similar / if not identical at all stores across their network.

Harmonizing procedures also plays a key role in helping a retailer manage costs. The continued growth of online retail and the resulting competition emanating from the massive US and China based online retail companies, makes it crucial for retailers to ensure that they are offering customers a great retail experience at a competitive price. Some of the strategies for managing costs involve retailers making common decisions for all Western Canada concerning product supplies and advertising – such as the procurement of checkstand bags.

### **Government of Saskatchewan Request**

RCC members have stated repeatedly that they would prefer provincial (or Federal) governments take the lead on potential actions surrounding efforts to reduce single-use plastics and, in this regard, will be meeting with the Honourable Dustin Duncan, Minister of Environment to make a request for a coordinated approach for the province, in collaboration with Municipalities.

In a province like Saskatchewan, if a few municipal governments take action that is not harmonized with general practices across the region, there can be cost implications for retail stores. If Regina were to decide to ban single-use plastic bags or other single-use items, some of Regina's retailers would incur higher initial and ongoing costs by changing to different products to replace the banned products.

However, larger retailers that have a store in Regina would have to amend their system wide supply chain and procedures in order to serve a couple stores in Regina. The cost to provide different checkout bags and other materials to a couple stores would create cost increases.

If the provincial government is unwilling to take a leadership role in creating a harmonized plastics strategy, RCC is prepared to advocate with larger Saskatchewan municipalities to create a harmonized quasi provincial approach to this issue.

## Preferred Approach to Single-Use Plastics

Given the need for cooperation between governments and industry, RCC has developed a list of preferred approaches, where it could work in conjunction with governments at all levels, to achieve a reduction in the use of plastic products.

RCC believes that these approaches are broad enough that they could be modified to address local realities for government, business and community. The preferred options are as follows:

### **Single- Use Plastic Bags:**

#### **Option A: Mandated Reduction Strategies:**

Mandate businesses to develop individual plans for bag reduction, as Vancouver BC has adopted.

The attached retailer education piece [Found Here](#) that Recycle BC developed in conjunction with RCC supported this effort to work towards reduction in single-use plastic bags. This document is a great resource for retailers in helping to successfully abide by the City bylaw.

#### **Option B: Impose Mandatory Fee**

Impose a mandatory fee set by regulation/bylaw that acts as an effective disincentive.

Retailers would not support fees being remitted to the government due to significant administrative burdens and inconsistent bag supply costs. It should be noted that not all municipal governments have the authority to impose a fee on bags.

#### **Option C: A Plastic Bag Ban**

Although a ban on single-use plastic bags is not a preferred approach, we are not opposed to a ban. Our members ask however that in the absence of a federal approach that is designed to create a harmonized and level playing field, regional governments look to other existing regulations to avoid creating unnecessary inconsistency.

A harmonized approach ensures operational simplicity, improved environmental outcomes –and the least disruption for consumers.

We believe Prince Edward Island’s “Plastic Bag Reduction Act” found [HERE](#) provides a good template, and is presently being considered by Nova Scotia, Newfoundland, New Brunswick, Ontario, BC and neighbouring Manitoba.

**Appendix A** at the end of this document outlines our recommendations to enhance environmental and operational outcomes that are being recommended as identified through practical application of the PEI regulation.

## Packaging and Other Single-Use Items

Retailers are active participants in multi-stakeholder national and global discussions including the National Strategy for Zero Plastic Waste and Circular Economy Leadership Coalition in an effort to reduce their environmental footprint.

While packaging has many important functions, RCC members are making efforts to reduce the amount of plastics and packaging waste in their operations by:

- Removing difficult-to-recycle materials (PVC and expanded polystyrene)
- Increasing post-consumer recycled content;
- Ensuring and encouraging use of recyclable packaging materials;
- Reducing packaging for eCom-specific items;
- Providing alternatives to single-use products (bags, utensils, cups, straws, etc.)

RCC Members welcome the June 2019 announcement of the federal government's intended leadership on reducing Canada's reliance on single-use plastic items.

Generally, RCC members prefer national leadership over municipal regulation, and believe a longer-term effort requiring progressive measures is best to allow for consumer education and research to be completed to avoid unintended negative environment consequences of a migration to alternative materials (bamboo, virgin paper, etc.)

However, RCC supports:

- Polystyrene foam restrictions on disposable cups and take-out containers;
- An approach that only allows single-use items (straws, cutlery...) upon customer request;
- A requirement to use reusable cups and reusable dishware where practical;
- Reduction efforts that evolve to a ban on plastic straws, with certain exceptions (*hospitals, physically challenged, drink boxes...*);
- IC & I where public spaces exist (shopping malls, large office buildings...) could be required to manage materials they generate.

## Final Comments:

RCC welcomes the opportunity to work with your Council as they explore how to find the right balance in reducing the public's reliance on single-use plastics.

Our members want to be part of the solution. RCC has been working hard with the federal government and governments in provinces across Canada to find sensible solutions that are based on science and business realities.

We welcome continued discussions with the City of Regina, the provincial government of Saskatchewan and the federal government on the issue of single-use plastics. We remain hopeful that all governments will engage us in meaningful discussion on this issue.

Thank you again for taking the opinions of the retail sector into consideration on this issue. Should you have any questions or comments regarding the information provided in this letter, please feel free to contact me at (204) 926-6824.

Sincerely,



John Graham  
Director of Government Relations (Prairie Region)

cc: RCC members who conduct business & employ people in Regina  
Pat Wilson, Director of Water, Waste and Environment, City of Regina  
Philippe Cantin, Senior Director, Sustainability Innovation and Circular Economy, Retail Council of Canada

## APPENDIX A:

### PEI TEMPLATE PLASTIC BAG BAN

Should the City of Regina choose to move forward with a municipal ban on plastic checkstand bags, RCC members encourage supporting the important principle of harmonization by modeling a bylaw using existing best practices.

In recent months RCC and its members have been actively supporting Provincial and municipal single use plastic bag deliberations across the Country.

We applaud several jurisdictions who are considering or have implemented bans that have considered using Prince Edward Island's "The Plastic Bag Reduction Act" [HERE](#) as a harmonized template, and we would advocate the Saskatchewan Government or Regina do so as possible, should a ban be the directive of Council.

However, since the implantation of the July 1, 2019 PEI regulation, we have also been recommending the following eight points through practical experience.

These include:

1. **Definition of Business:** With the definition of business we would encourage the exclusion of Food Banks and Charities as food bank clients depend on bags for transporting donations. Nova Scotia added this amendment to the PEI regulation.
2. **Definition of a "Reusable Bag":** We encourage you to not include the prescriptive "primarily made of cloth or other washable fabric" as new and environmentally improved materials will be entering the market soon and their adoption would require a regulatory amendment.
3. **Fee on Paper (Section 4.2):** We encourage a fee be charged for a paper bags. Without a fee, consumers would simply shift to single use paper bags that are arguably equally environmentally problematic.
4. **List of Exceptions:** Avoid "made in Regina" exceptions and for operational simplicity harmonize with the PEI list.
5. **Delete 5 – 3c for Hygiene Reasons:** PEI allows for single use plastic bags to be returned to stores for reuse by other customers. For hygienic reasons, we would recommend excluding this exception.
6. **Graduated Implementation (Section 8):** We strongly prefer one fixed fee from the enactment date so as to avoid consumer and business confusion by changing the minimum fee for a paper bag or reusable bag. PEI adjusts its minimum fees up after six months.

- 7. **One Year Enforcement Date:** PEI (and Nova Scotia as well as several other jurisdictions) allow for a one-year period until the regulation comes into force to allow existing inventories of plastic bags to be used up, new suppliers to be sourced as well as consumers to adjust.
  
- 8. **Charitable Donations:** Consideration may wish to be given to allow for donation of reusable bags to charities and events for free, if not during a checkstand transaction (an exception to the minimum charge requirement).

**For Further Discussion**

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