

October 3rd, 2019

Hon. Jeff Yurek, Minister of Environment, Conservation and Parks
College Park 5th Flr
777 Bay St,
Toronto, ON M7A 2J3

Subject: A Harmonized Approach to Reducing Single-Use Plastics

Dear Minister Yurek;

Retail is Canada's largest private sector employer with over 2.1 million Canadians working in our industry. The sector annually generates over \$76 billion in wages and employee benefits. Core retail sales (excluding vehicles and gasoline) were \$377 billion in 2018. Retail Council of Canada (RCC) members represent more than two-thirds of core retail sales in the country. 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.

Across Ontario, several motions have passed municipal and regional councils beginning the process of reducing single-use plastics within those jurisdictions.

Retail Council of Canada (RCC) is aware there will be a series of municipal and regional reports released in the first quarter of 2020 that we believe will influence other jurisdictions to develop similar reduction efforts.

RCC members are steadfastly committed to reducing the environmental impact of their operations and the products they sell. You will recall, RCC's President & CEO, Diane J. Brisebois, joined you to share retailers' support of transitioning the blue box recycling system to full producer responsibility.

Ontario consumers have an increasing concern over the environmental impact caused by single-use plastics, including plastic shopping bags. The retail community already increased the use of reusable shopping bags, introduced plastic shopping bag user-fees and implemented other plastic shopping bag reduction initiatives.

While we fully support the reduction of the use of single-use plastics from retail stores and understand the sentiment behind the move by municipal and regional governments to reduce single-use plastics, we are nevertheless concerned that this action will lead to a patchwork of single-use plastic by-laws across the province of Ontario, as we have seen in other jurisdictions. For example, in Quebec there are 40 different municipal jurisdictions with 19 unique set of rules governing plastic shopping bags.

Retailers of all sizes – especially those with multiple locations across multiple municipalities – find it very difficult to manage the complexities of unique municipal and regional restrictions, in many cases, for a single store location. A patchwork of single-use plastics by-laws adds compliance costs and operational burden to retail stores.

In every Canadian province, retail is one of the most competitive sectors of the economy. Retailers are in constant competition for consumers. Even in small towns, retail competition is no longer limited to the brick-and-mortar retailer, as competition now includes online retailers from the United States and overseas. In such a competitive environment, consumers' demands have increased, profit margins have decreased, and customer service is more important than ever.

Instead of taking local, individual action RCC would support a move for a harmonized approach, taken by the provincial or federal government.

This is a matter currently under discussion with the Federal government and other provinces, including through the Canadian Council of Ministers of the Environment. As well, Prince Edward Island has already instituted harmonized action on plastic shopping bags; the Government of Newfoundland and Labrador has indicated that they intend to take similar action; and New Brunswick's Minister of Environment has indicated that he is open to harmonized action. A week ago, Nova Scotia tabled a bill that would see a harmonized approach to plastic shopping bags in that province.

RCC would support action taken at a province-wide level.

RCC is aware Minister Yurek and the Ontario Government are beginning early engagement this autumn with a broad range of municipalities and stakeholders about Blue Box. RCC would encourage the Minister, and the Ministry of Environment, Conservation and Parks to connect with municipalities/regional governments exploring the idea of implementing one-off local initiatives and invite them to use that forum to discuss a province-wide solution.

With this, Ontario can both realize the objective of the various municipal/regional motions on single-use plastics, while avoiding the negative impact of different rules for businesses in each municipality.

RCC and its members advocate for going green – just without increased red tape.

Kind Regards,



Sebastian Prins
Director of Government Relations (Ontario)

RETAIL COUNCIL OF CANADA | CONSEIL CANADIEN DU COMMERCE DE DÉTAIL

Tel: (416) 467-3759

Email: sprins@retailcouncil.org

CC'ed: Mayor John Tory, City of Toronto
Regional Chair Nando Iannicca, Region of Peel
Mayor Bernadette Clement, City of Cornwall
Mayor Trevor Birtch, City of Woodstock