

REDUCING LITTER AND WASTE IN OUR COMMUNITIES: DISCUSSION PAPER

Presented to:

Ministry of the Environment, Conservation and Parks

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**Restaurants
Canada**

The voice of foodservice | La voix des services alimentaires

REDUCING LITTER AND WASTE IN OUR COMMUNITIES

Restaurants Canada has been the voice of foodservice in this country for 75 years. With over 30,000 members, Restaurants Canada's primary goal is to improve the foodservice industry for the millions of Canadians that rely on our industry for employment, entertainment, socialization and above all for good food.

Restaurants Canada believes that environmental responsibility is important for our industry to embrace. From locally sourced ingredients to energy efficiency, sustainability is simply a part of doing business in restaurants today. In fact, nine out of ten respondents to our annual Restaurant Outlook Survey said they plan to continue or increase their current level of environmentally sustainable operations over the next three years. The theme of the 2019 RC Show was *Sustainability* and featured products, seminars, workshops and services to support our members with their efforts to put the environment on the menu.

With this in mind, we are happy to provide a submission in response to the government's consultation in response to *Reducing Litter and Waste in Our Communities: Discussion Paper*.

We appreciate the opportunity to participate in this consultation and look forward to working with the government as it implements its plan: *Preserving and Protecting our Environment for Future Generations: A Made-in-Ontario Environment Plan*.

Discussion Paper Responses:

2.1 PREVENT AND REDUCE LITTER IN NEIGHBOURHOODS AND PARKS

1. *How best can the province coordinate a day of action on litter?*

Restaurants Canada would be pleased to support a coordinated day of action on litter by promoting it to our members. Many of our members currently support litter reduction initiatives across the province with either formal nation-wide campaigns such as Pitch-In Week or by supporting local clean-up and litter prevention campaigns.

Most recently, Restaurants Canada encouraged our members to focus on litter reduction as part of our Single-Use Items Strategy Reduction Guide. Recommendations included working with area businesses and promoting local litter reduction initiatives.



2. *What do you or your organization do to reduce litter and waste in our public spaces? What role should the province play to facilitate this work?*

Restaurants Canada encourages our members to play a vital role in reducing litter by providing the proper number of waste and recycling receptacles on site as well as implementing proper

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procedures for keeping their premises clean. As noted above, our members are further encouraged to support and even initiate clean-ups and bigger initiatives such as Great Canadian Shoreline Cleanup.

Any strategy to reduce litter must start with consumer education. Litter is the result of human behaviour rather than the attributes of any packaging or item. The province can support increased consumer education, along with the business community, to stop litter before it happens.

2.2 INCREASE OPPORTUNITIES FOR ONTARIANS TO REDUCE WASTE

1. *How can the province best help the public participate in waste reduction and diversion activities? How can the province facilitate better diversion in lagging areas, such as multi-unit residential buildings?*

Restaurants Canada suggests that increased consumer education would support public participation in waste reduction and diversion activities. We support this type of education with our members, as we have done with our Single-Use Items Reduction Strategy Guide, to promote best practices and easy to follow checklists. A similar approach with Ontario residents may result in improved waste reduction and diversion rates.

Further, review and evaluation of new technologies that allow for diversion or contaminated or mixed wastes that can sometimes occur in public spaces may result in better diversion. In the case of restaurants, this could support some of our members who are faced with contaminated recycling streams and/ or soiled packaging.

2. *What types of initiatives do you think would result in effective and real action on waste reduction and diversion for the IC&I sectors?*

Restaurants across the province and the country have acted to reduce and divert waste.



For example, in 2018 A&W Food Services Canada became the first quick-service restaurant chain in North America to eliminate plastic straws from their restaurants. This commitment and change to a paper straw is projected to eliminate the use of 82 million plastic straws annually. A number of other restaurant chains have made a similar commitment.

Additionally, restaurants of all sizes have moved to reduce the unnecessary use of plastic products. On their own initiative, businesses are taking action to reduce waste. The marketplace, consumer preferences and the desire of businesses to act have driven the commitments and actions of our members.

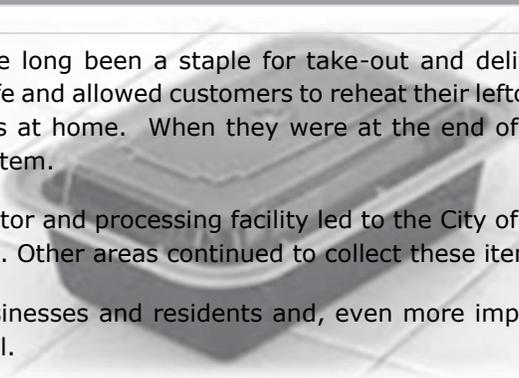
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3. *What role do you think regulation should play in driving more waste reduction and diversion efforts from the IC&I sectors?*

Feedback from Restaurants Canada members tells us that the largest challenges they face with respect to diversion is access to facilities that accept and process food service packaging and food waste. With members operating in urban, rural and remote areas, there are varying levels of availability and accessibility to diversion programs.

There is also an inconsistent approach to what is collected in municipal and commercial programs which makes it challenging for consumers to receive consistent messaging and allow for habits to be formed with respect to diversion.

Case Study: Black Plastics



Black plastic containers have long been a staple for take-out and delivery of restaurant foods. These containers are microwave safe and allowed customers to reheat their leftover food and were sturdy enough to be reused countless times at home. When they were at the end of their life-cycle, they were easily recycled by the Blue Box system.

In 2018, a change in contractor and processing facility led to the City of Toronto to remove black plastics from their recycling program. Other areas continued to collect these items as part of their programs.

This led to confusion for businesses and residents and, even more importantly, a product that could be recycled being sent to landfill.

An inconsistent approach limits options and discourages investment in new packaging that may not be accepted in the existing system. It is important that regulation and operational decisions not stifle innovation and allow for free and open marketplace.

4. *How can we get accurate information on waste reduction and diversion initiatives in the IC&I sectors?*

In Ontario today designated businesses undertake annual waste audits and accompanying waste reduction work plans. As part of this effort, businesses complete the associated ministry paperwork detailing volumes of materials generated and diverted. A reporting mechanism for this information may assist the province in acquiring information concerning waste reduction and diversion initiatives in the IC&I sectors.

It will be important that any reporting mechanism created be a single portal that would allow for harmonization with any future reporting in other provinces and/or nationally.

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2.3 MAKE PRODUCERS RESPONSIBLE FOR THEIR WASTE

1. *How do you think the Blue Box program could best be transitioned to full producer responsibility without disrupting services to Ontario households?*

We support the government's commitment to transition the Blue Box to full producer responsibility on the condition that it occurs over a reasonable timeline in order ensure a successful transition.

During the period of transition, it is imperative that the Blue Box program remains focused on residential waste. This will facilitate a smooth transition of the existing system rather than attempting to transition and grow in one process.

Additionally, the transition must ensure producers' regulatory flexibility to enter into new agreements with service providers to meet collection and diversion targets.

2. *Should it transition directly to producer responsibility under the Resource Recovery and Circular Economy Act, 2016 or through a phased approach?*

Restaurants Canada supports a transition that provides for cost increases to be evenly and incrementally shifted to producers over time. The development of such a mechanism will require the government to work with municipalities and businesses.

3. *When do you think the transition of the Blue Box program should be completed?*

Restaurants Canada supports an approach that sets a start date for the transition of the Blue Box program rather than focusing on the end date. As stated above, work is needed to develop the appropriate mechanism to regulate the amount of costs that can be shifted to producers in any given year. Further, in order that the transition be orderly and as seamless as possible for residents, it is important to provide an avenue to pause during transition, if needed, to address any issues rather than rushing toward an end date.

4. *What materials do you think should be managed through producer responsibility to maximize diversion?*

We are supportive of the government's goal to transition existing waste diversion programs to a full producer responsibility model.

Foodservice packaging is currently managed via stewardship or extended producer responsibility in Ontario. The greatest barrier to increased diversion is the inconsistency or variations with respect to the acceptability of some foodservice packaging in municipal Blue Box programs, such as hot beverage cups and take-out containers.

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5. *How can we make it easier for the public to determine what should and should not go in the Blue Box?*

Harmonization of acceptable Blue Box materials will allow for consistent consumer education and messaging across the province, making it easier for the public to determine what does in their Blue Box no matter where they live.

In advance of transitioning the Blue Box to producers, the government may wish to consider a policy statement to guide municipalities towards the collection of standardized materials.

6. *How should the province implement the transition process of its existing programs to producer responsibility without interrupting service?*

As with previous answers, the transition process needs to be measured and flexible in order to ensure a smooth changeover to a new system.

2.4 REDUCE AND DIVERT FOOD AND ORGANIC WASTE

1. *What can be done to increase the safe rescue and donation of surplus food in Ontario?*

Many members of Restaurants Canada currently participate in the safe rescue and donation of food. Restaurants donate a great deal of surplus food through partnerships groups like Second Harvest, by using foodrescue.ca, or directly with local providers.

In many instances, food waste (or organic waste) generated in a restaurant is the result of meal preparation or plate waste rather than salvageable food that is unsold and available for donation.

It must be noted, however, that there is a limited amount of salvageable food in restaurant operations. Due to the fact that food is a commodity, restaurants do all they can to ensure they prepare only what is needed for the customers. Restaurateurs are focused on production that minimizes excess food waste. In cases of miscalculated production or timing, Public Health and Safety regulations often restrict the donation of these food items.

2. *What role do you think government and industry can play in raising education and awareness of the issue of food waste?*

As with other areas of this discussion paper, education is key to the reduction of food waste. Restaurants Canada is supportive of the government's approach of working with interested partners, including municipalities and industry, to build on existing efforts and consider any relevant national policies, initiatives or successful waste reduction activities in other comparable jurisdictions.

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3. *Do you think the province should ban food waste? If so, how do you think a ban would be best developed and implemented?*

Consideration and review of a ban must be aligned with availability of cost-effective infrastructure for diversion. Restaurants Canada supports an approach where the timing of any bans reflects the need for processing capacity across the province.

2.5 REDUCE PLASTIC WASTE GOING INTO LANDFILLS OR WATERWAYS

1. *What do you think is the most effective way to reduce the amount of plastic waste that ends up in our environment and waterways?*

The issue of litter reduction is closely related tied to the reduction of plastic waste in the environment. Increased consumer education is the key to decreasing this waste.

2. *What role do you think various levels of government should play in reducing plastic waste?*

Restaurants Canada is supportive of the government's approach to "continue to work with other provinces, territories, and the federal government on the development of an action plan to implement a Canada-wide strategy."

A consistent national approach would allow for a common public promotion and education campaign increasing the potential for success and action from Canadians.

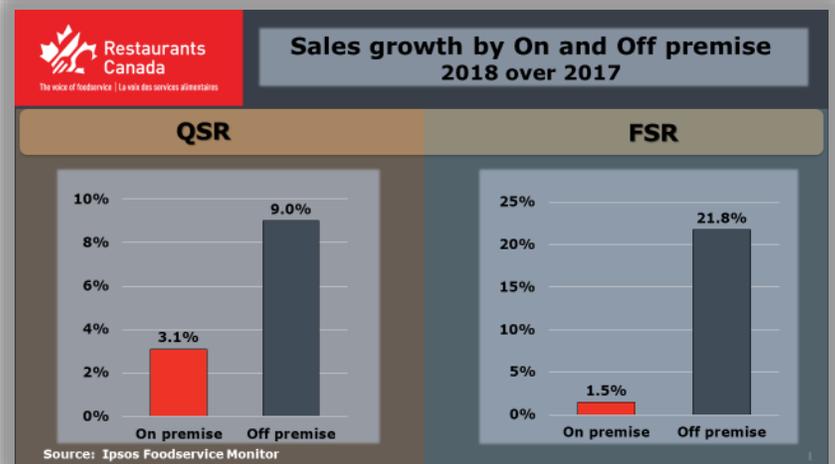
3. *Would you support and participate in shoreline and other clean-up projects to keep our waterways and land free of plastic waste?*

Similar to our response with respect to a day of action, Restaurants Canada would be pleased to share information with our members concerning these initiatives. As noted, our members are already involved in many initiatives to reduce all litter, including plastic waste. (Please see response to 2.1, question 1 for more details).

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4. *Would a ban on single-use items be effective in reducing plastic waste?*

While a ban on single-use plastics may remove selected items from the marketplace, it is unlikely to result in an overall waste reduction or meaningful change. In other jurisdictions that have implemented bans, such as San Francisco, litter audits have revealed that the volume of litter remained the same while the composition of the litter changed. Additionally, implementation of a ban does not eliminate the need for alternative packaging to replace plastics.



Ultimately, the pressure for single-use items comes from consumers. Ontarians are increasingly turning to delivery and take-out over on-premise dining.

In some cases, provincial law mandates the use of single-use packaging such as the mobile food premises regulation under the *Health Protection and Promotion Act* where alternatives to sturdy plastic containers are not feasible or available. In addition, when people take leftover food home from a restaurant meal, there is an inherent pressure between avoidance of food waste and the usage of a single-use (typically plastic) container.

5. *What are your views on reducing plastic litter through initiatives such as deposit return programs?*

Deposit return programs have most often been implemented on beverage containers such as plastic bottles, aluminum cans and the like. It is our understanding that these items are effectively managed through the existing recycling programs.

2.6 PROVIDE CLEAR RULES FOR COMPOSTABLES

1. *How do you think compostable products and packaging should be managed in Ontario?*

Restaurants Canada is supportive of the government proposal to “work with industry and municipalities to build consensus on how compostable products and packaging can be best managed to ensure they do not go to landfill.” Further, we support and will participate in the government’s commitment to convene a working group.

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2. *Should producers of compostable products and packaging be held responsible for the management and processing of their materials?*

Compostable products and packaging are well-positioned to play a part as we move to look at alternative packaging options. As the facilities for collecting and processing these materials are not certain, it is premature to take a position on their inclusion in potential producer responsibility models.

3. *What role do you think standards and facility approvals should play in the proper management of compostable products and packaging?*

Access to cost-effective and accessible facilities are key to the development and future use of compostable materials. If the use of this type of packaging is to be encouraged, progressive standards and facility approvals will be increasingly important.

CONCLUSION:

Restaurant owners, operators and staff are working hard to navigate the complex regulatory environment related to the day-to-day operations of their businesses.

Environmental actions in the foodservice industry involve the balancing of often conflicting pressures. The pressure to reduce single-use items while meeting the needs of guests seeking increasing convenience and delivery options. The pressure to lessen food and organic waste while meeting the strict health regulatory regime. The desire to use more eco-friendly materials with the realities of recycling and composting programs. The requirement to meet different standards and expectations in different jurisdictions.

The desire for governments of all levels to act has created a patchwork of by-laws and regulatory frameworks that make it difficult for foodservice chains and independent operators to make decisions that benefit the environment.

Businesses are willing to amend their practices and make investments to support the *Made-in-Ontario Environment Plan*, but they want to ensure these investments are effective. The government's commitment to work in concert with business will maximize everyone's efforts.

Ultimately, it will be up to the public to buy into changes that will better our environment. Government's role in public education can be supported by business if we work together to a common goal; creating a better Ontario for future generations.



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LINKS:

- Single-Use Items Reduction: Reduction Strategy Guide
<https://info.restaurantscanada.org/hubfs/Resources/Toolkits/Single-Use-Items-Reduction-Strategy-Guide.pdf>
- Sustainability: Best Practices Guide
<https://info.restaurantscanada.org/hubfs/Resources/Toolkits/Sustainability-Best-Practice-Guide.pdf>