

2021

City of Victoria | Zero Waste Victoria  
Consultation Paper

# Single-Use Items



[engage.victoria.ca/reducesingleuse](https://engage.victoria.ca/reducesingleuse)

**#MakeReuseTheNorm**



## Background

Zero Waste Victoria is Victoria’s plan to transition to a future where products and materials are avoided, reduced and reused.

Restricting or eliminating single-use items where sustainable or reusable alternatives exist, while meeting accessibility needs, is an important action to curb our waste footprint. Single-use items include a range of products that are designed for a single use and typically disposed of after one or a few uses. These items include bags, coffee cups, takeout containers, cutlery, straws and stir sticks.

Banning or restricting harmful single-use plastic products is an important step towards reducing the amount of plastic waste that ends up in landfills and littered into the natural environment. These plastic materials are also scientifically proven to cause environmental harm, according to Canada’s Science Assessment of Plastic Pollution.

Single-use packaging is a key contributor to the plastic pollution crisis. It is estimated that the ocean currently contains 150 million tonnes of plastic<sup>1</sup>, which is mostly preventable packaging.<sup>2</sup>

In December 2020, City of Victoria Council directed staff to report back with a draft bylaw to regulate problematic single-use items. Part of this process includes engaging with residents and businesses within the community to inform them of potential policies to reduce single-use items and collect feedback and local insights related to these options.

### GOALS

- 1 **Unnecessary and problematic single-use items and packaging are eliminated**
- 2 **Reusable products are the default**

**The Ellen MacArthur Foundation’s New Plastics Economy Initiative acknowledges “while improving recycling is crucial, we cannot recycle our way out of the plastics issues we currently face. Elimination of problematic or unnecessary plastic packaging through redesign, innovation, and new delivery models is a priority. Reuse models need to be applied where relevant, reducing the need for single-use packaging”.<sup>3</sup>**

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To read more about Zero Waste Victoria, visit **[victoria.ca/zerowaste](https://victoria.ca/zerowaste)**

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1 Excluding abandoned fishing gear.

2 Jambeck, J.R., Geyer, R., Wilcox, C., Siegler, T.R., Perryman, M., Andrady, A., Narayan, R., K.L. (2015). Plastic waste inputs from land into the ocean, *Science*; 347 (6223). Retrieved from: <https://science.sciencemag.org/content/347/6223/768>

3 Ellen MacArthur Foundation; 11 October 2019; The New Plastics Economy Global Commitment – 2019 Progress Report. Retrieved from: <https://www.newplasticseconomy.org/about/publications/global-commitment-2019-progress-report>



## Single-Use Items in Our Community

The City of Victoria collects over 5 million single-use items per year through its curbside waste collection service, and a further 9 million single-use items per year through public realm waste collection from City sidewalks, bus stops and parks. Single-use items are also littered on Victoria's streets, parks and beaches and the City's stormwater and sanitary infrastructure is susceptible to blockage and contamination from these products.

**Every day, Victoria residents throw away over 75,000 single-use items.**



*Most Common Single-Use Items Used in Victoria*

## Federal Government Plans to Reduce Single-Use Item Waste

In October 2020, the Government of Canada announced the next steps in their plan to achieve zero plastic waste by 2030. A key part of the plan is a ban on harmful single-use plastic items where there is evidence that products:

- Are found in the natural environment
- Not regularly recycled
- Have readily available alternatives.

Based on these criteria, the federal government proposes to ban plastic checkout bags, straws, stir sticks, six-pack rings, cutlery, and food service ware made from hard-to-recycle plastics. A full list of items and strategies is available in their discussion paper, *A Proposed Integrated Management Approach to Plastic Products to Prevent Waste and Pollution*.

## Provincial Government Plans to Reduce Single-Use Item Waste

In September 2019, the BC Ministry of Environment and Climate Change Strategy released their *Plastics Action Plan* to engage on the development of new policy options to reduce plastic waste. On July 26, 2021, the provincial government announced new authorities for local governments such as Victoria to adopt:

- Bans on plastic checkout bags in conjunction with fees on single-use paper bags
- Bans on polystyrene foam food service ware
- Bans on most plastic drinking straws, with by-request exemptions for accessible straws
- Bans or by-request restrictions on plastic utensils including stir sticks

The provincial government reports that these items are commonly mismanaged, found in the environment, and have suitable alternatives available.



## City of Victoria Action to Reduce Single-Use Items

The City introduced the first municipal single-use item regulation in British Columbia with the adoption of its *Checkout Bag Regulation Bylaw* in January 2018. Following a legal challenge by the plastics industry and subsequent provincial government approval, the bylaw came back into effect on April 15, 2021.

Victoria businesses and residents have demonstrated a strong commitment to minimize plastic waste in the community and shift to regular use of reusable bags. Zero Waste Victoria builds on this momentum, with strategies to eliminate additional single-use items, support reusable container services, and reduce waste and litter in public places.

**The City of Victoria is currently developing a Sustainable Food Service Ware Guide. The purpose of the guide is to support Victoria restaurants and cafes when choosing sustainable packaging products. In previous consultations, Victoria businesses indicated a strong desire for the City to identify and advise which products can be managed responsibly within our regional recycling and composting system. Businesses can access the guide from the City's website at [victoria.ca/zerowaste](https://victoria.ca/zerowaste) when it publishes later this fall.**

## Previous Engagement on Single-Use Items

Over the past three years, City of Victoria staff have engaged with businesses and residents to assess community support and readiness to reduce unnecessary single-use items. Key take-aways from this engagement include:

- Foam containers and single-use plastic straws can be eliminated immediately (while considering accessibility needs).
- The City should follow science and evidence-based approaches when prioritizing actions to reduce single-use items.
- Businesses and residents in the community are uncertain how to manage the variety of products labelled as compostable.
- The City is in a good position to guide businesses towards the most sustainable products that can be responsibly managed within our region.
- There is strong interest from cafes and restaurants in piloting reusable sharing programs.
- The costs of sustainable products varies between large franchises and small independent businesses.
- The convenience of disposable products is a challenge to overcome.



## Compostable Plastics

Compostable plastic is often advertised as a more sustainable option for packaging than conventional plastic. However, in practice, compostable plastics present a range of issues to existing composting and recycling systems.

Compostable plastics are indistinguishable from conventional plastic products and regularly screened out at composting facilities.<sup>4</sup> In addition, even if a product is labelled as certified compostable, these materials do not necessarily break down as designed in actual composting processing conditions. In fact, many plastics labelled as compostable or biodegradable have the potential to introduce microplastics<sup>5</sup> and chemical additives<sup>6</sup> into soil as they fragment into smaller and smaller pieces. Most compostable plastics are not recyclable either and can contaminate the recycling stream if added to 'blue box' material. For these reasons, compostable plastics typically end up in the landfill.

It is also important to acknowledge that compostable plastic food service ware is designed to be single-use and consumes significant resources and energy in production, just as conventional single-use plastic and paper food service ware does.

**Life cycle analysis (LCA) studies have shown that the environmental impact of compostable polylactic acid (PLA) cups is comparable to that of plastic polyethylene terephthalate (PET) cups, and much higher than that of single-use cups made of paperboard.<sup>7</sup> Studies have also shown that composting PLA cups does not provide any ecological benefit to the finished compost product.<sup>8</sup>**

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4 Why Oregon Composters Don't want "Compostable" Packaging. (2019). Retrieved from: <https://www.oregon.gov/deq/mm/Documents/MessagesfromComposter-En.pdf>

5 Cesare A., Abbas H.K., Bruno V., Nissen L., Vicari A., Bellaloui N., Little N.S., Shier W.T. (2020). *Persistence in soil of microplastic films from ultra-thin compostable plastic bags and implications on soil Aspergillus flavus population*. Waste Management. Volume 113, Pages 312-318. Retrieved from: <https://www.sciencedirect.com/science/article/pii/S0956053X20303214>.

6 American Chemical Society. (2019). Compostable food containers could release PFAS into environment. ScienceDaily. Retrieved from: [www.sciencedaily.com/releases/2019/05/190529084838.htm](http://www.sciencedaily.com/releases/2019/05/190529084838.htm)

7 The Significance of Environmental Attributes as Indicators of the Life Cycle Environmental Impacts of Packaging and Food Service Ware. (2018) State of Oregon Department of Environmental Quality. Portland, Oregon. Retrieved from: <https://www.oregon.gov/deq/FilterDocs/MaterialAttributes.pdf>

8 Ibid.

## The Benefits of Reusables

Reusable food service ware provides a range of benefits when compared to conventional disposable products including waste reduction, less environmental harm, costs savings for businesses and consumers, and opportunities for branding and marketing aligned with a growing segment of sustainably-minded customers.<sup>9</sup>

The Oregon Department of Environmental Quality (DEQ)<sup>10</sup> has found that reusable food service ware outperforms disposable products across a range of environmental criteria.

The potential to reduce waste by using reusable food service ware is also significant for individual businesses. For example, if an average coffee shop used only reusable cups it can eliminate up to 250,000 single-use cups from being disposed every year with annual cost-savings of up to \$25,000.<sup>11</sup>



- **Greenhouse Gas Emissions** – using a reusable water bottle instead of a single-use plastic water bottle (even when recycled) can reduce GHG emissions by up to 80%<sup>12</sup>
- **Water Consumption** - using reusable cups can reduce water consumption by up to 85% compared to the equivalent use of disposable single-use cups throughout their lifecycle<sup>13</sup>
- **Waste & Litter** - switching to reusable cups and takeout containers could help prevent the waste from over 27 million single-use items disposed by Victoria residents every year
- **Plastic Pollution** – In 2016, 29,000 tonnes of plastic waste entered the Canadian environment as pollution.<sup>14</sup> Replacing single-use plastic

products with reusable options can help to eliminate this plastic pollution at its source.

### CONTINUOUS IMPROVEMENT

The number of uses needed for reusable food service ware to have less environmental impacts than disposable single-use items varies by item type and material. Other factors that contribute to the environmental sustainability of reusable products include the efficiency of dishwashing equipment and the energy and materials used to produce them.<sup>15</sup> Innovations in product design and operational efficiency will continue to reduce the environmental impact of reusable alternatives.

9 Rethink Disposables Reusable Food Service Ware Guide. Retrieved from: [http://www.stopwaste.org/sites/default/files/WEB\\_CA\\_ReTh\\_Foodware\\_04.29.15\\_web.pdf](http://www.stopwaste.org/sites/default/files/WEB_CA_ReTh_Foodware_04.29.15_web.pdf)

10 The Significance of Environmental Attributes as Indicators of the Life Cycle Environmental Impacts of Packaging and Food Service Ware. (2018) State of Oregon Department of Environmental Quality. Portland, Oregon. Retrieved from: <https://www.oregon.gov/deq/FilterDocs/MaterialAttributes.pdf>

11 Reuse Wins Report\_ Upstream (2021). Retrieved from: <https://upstreamsolutions.org/reuse-wins-report>

12 Allaway, David. (2009). Comparing Prevention, Recycling, and Disposal: A supplement to DEQ's "Life Cycle Assessment of Drinking Water Delivery Systems: Bottled Water, Tap Water, and Home/Office Delivery Water." Retrieved from: <http://www.deq.state.or.us/lq/pubs/docs/sw/LifeCycleAssessmentDrinkingWaterSupplement.pdf>

13 Reuse Wins Report\_ Upstream (2021). Retrieved from: <https://upstreamsolutions.org/reuse-wins-report>

14 A proposed integrated management approach to plastic products to prevent waste and pollution. Environment and Climate Change Canada. (2019). Retrieved from: <https://www.canada.ca/en/environment-climate-change/services/canadian-environmental-protection-act-registry/plastics-proposed-integrated-management-approach.htm>

15 The Significance of Environmental Attributes as Indicators of the Life Cycle Environmental Impacts of Packaging and Food Service Ware. (2018) State of Oregon Department of Environmental Quality. Portland, Oregon. Retrieved from: <https://www.oregon.gov/deq/FilterDocs/MaterialAttributes.pdf>



## The Safety of Reusables



Reusable food and drink containers are becoming an increasingly popular option to reduce single-use item waste. British Columbia has a range of legislation regulating food safety at food processing, service and retail levels. The *Food Premises Regulation* allows the use of reusable cups and containers providing that an operator protects food from contamination and handles and dispenses food in a sanitary manner.<sup>16</sup>

A comprehensive analysis of public health guidance and scientific evidence undertaken by researchers at the University of Toronto's School of Public Health in 2021 suggests there continues to be many opportunities to use reusables in retail settings during the COVID-19 pandemic, albeit with added safety precautions, to reduce the risk of potential transmission.<sup>17</sup>

On July 2, 2021 the BC Centre for Disease Control issued a statement confirming that COVID-19 transmission from handling reusable containers such as grocery bags, coffee mugs, bulk bins and other reusable items has not been documented. Because the risk is low, businesses may go back to normal activities such as accepting and filling reusable coffee mugs and water bottles, allowing reusable containers for take-away per provincial policy (must be described in food premises, food safety or sanitation plan), and allowing reusable grocery bags.<sup>18</sup>

Third-party operated reusable cup and container programs can provide assurances to businesses and customers that the reusable products they are using are sanitary. Typically, these third-party services collect cups and containers from drop sites and then sanitize them in commercial dishwashers to meet health standards before being returned to the vendors for reuse.

16 BC Food Premises Regulation. [https://www.bclaws.gov.bc.ca/civix/document/id/complete/statreg/11\\_210\\_99](https://www.bclaws.gov.bc.ca/civix/document/id/complete/statreg/11_210_99)

17 Opportunities for Reusables in Retail Settings During the COVID-19 Pandemic in Canada:

A Review of Guidance and Evidence. National Zero Waste Council 2021. Retrieved from: [http://www.nzwc.ca/Documents/NZWC\\_OpportunitiesforReusablesinRetailReport.pdf](http://www.nzwc.ca/Documents/NZWC_OpportunitiesforReusablesinRetailReport.pdf)

18 BC Centre for Disease Control. Guidance for Food Businesses. Retrieved from: <http://www.bccdc.ca/health-info/diseases-conditions/covid-19/employers-businesses/food-businesses>

## Reusable Cup and Container Programs in Action



### The Nulla Project (Victoria)

Launched in 2019, Nulla currently offers a reusable coffee cup service and has over a dozen participating vendors. Customers pay a \$5 deposit fee for the cup and can exchange it for a clean cup at participating vendors. Nulla has plans to expand into offering a reusable takeout container program and expand their cup-share program to support waste reduction for the tourism and events industry at festivals, hotels, and at the cruise ship terminal for visitors.



Photo credit: Bread and Butter Collective

### Bread & Butter Collective (Victoria)

The Bread & Butter Collective is a group of independent, locally owned food and beverage businesses in Victoria who want to lessen the environmental impact of their businesses,

while improving conditions for their employees and sharing new ideas and resources to ensure long term success. In fall 2021, the Collective will launch Victoria's first reusable takeout container program with several of their member businesses. The City of Victoria is supporting this initiative by purchasing containers for all City staff as a step towards making reuse the norm.



Photo credit: GoBox

### GoBox (USA)

GoBox is an established reuse program operating in Portland, Oregon and San Francisco, California. There are over 100 participating food vendors in Portland and over 30 in the San Francisco Bay area. The model is a subscriber-based system, either through a monthly or annual subscription. Customers download the GoBox App, choose their subscription schedule, present their phone screen to the vendor when they purchase take-out food, and then deposit the container into one of the drop boxes when finished. Used containers are collected, cleaned, and sanitized in a health-authority approved commercial facility before being returned to the vendors for reuse.

# Reducing Single-Use Item Waste in Victoria

The City of Victoria is exploring a range of policy options to reduce single-use item waste and meet community zero waste goals. The options below describe the application and opportunity for each tool, while the specific regulations and implementation details for Victoria will be refined using community feedback from this consultation. City staff will conduct outreach and education before the implementation of any new initiative to ensure businesses and community members can successfully transition and comply with any potential change.

## By Request

A by request policy requires that businesses only provide single-use items to customers when requested. This policy tool increases consumer awareness and can be designed as part of a transition or for items where sustainable alternatives are not yet common or readily available. A by request policy can also be used to maintain products that are required for people living with disabilities, such as plastic disposable straws.

**By request provisions are being considered for the distribution of single-use accessory items such as straws, stir sticks, utensils, and condiments** that food and beverage retailers provide as a default but that are not always required by the customer.

By request requirements present businesses with an opportunity to reduce costs by selectively distributing single-use items. Implementation of this tool needs to consider training and education for front-line staff given the additional step of having to ask if the customer requires these items.



Photo credit: Bread and Butter Collective

Effective Apr 22, 2020, business licence holders in the City of Vancouver cannot automatically include single-use utensils (spoon, fork, knife, or chopsticks) in a customer's order for dine-in, drive-through, take-out, or delivery. These items can only be provided upon customer request.

The City of Portland's Single-Use Item Reduction Policy passed in 2019 has "by request requirements" for stir sticks, individually packaged condiments, and utensils.

## Mandatory Fee

Mandatory fee policies require businesses to charge a fee for single-use items. This tool presents customers with an overt cost associated with their choice of packaging and encourages them to use a cost-saving reusable alternative.

Fees have been shown to be more effective at driving change than discounts given to customers who bring their own reusable items.<sup>19</sup> Consistent with the City of Victoria's Checkout Bag Bylaw, the fees are intended to be collected and kept by individual businesses.

**Mandatory fees are being considered for single-use items where reusable alternatives are already viable such as takeout cups and containers.** The design of mandatory fee policies needs to consider opportunities to mitigate the potential additional cost burden on lower income individuals.

Effective Jan 1, 2022, business licence holders in the City of Vancouver will be required to charge a minimum fee of \$0.25 for every disposable single-use cup distributed, and starting in 2023, will need to report the number of single-use cups distributed in the past 12 months when they renew their annual business licence. The cup reporting requirement is waived for each business location participating in a reusable cup-share program, with the intention to encourage food vendors to participate in reusable cup-share programs.

## Bans

Bans restrict an entity or person from selling or distributing single-use items. Bans are generally applied to materials or products that have been shown to result in environmental harm or that are not compatible with existing infrastructure.

Bans of single-use items typically result in immediate and impactful waste reduction.<sup>20</sup> Bans must be introduced carefully to avoid the unintended consequences of substitution to other problematic or unsustainable alternatives. As a result, bans are often accompanied by technical specifications of allowable materials or products. For example, the City of Victoria's Checkout Bag Bylaw requires that paper bags contain at least 40% post-consumer recycled content.

Bans are currently in place in Victoria for conventional and compostable plastic checkout bags. **Additional bans are being considered for problematic materials and products including foam (expanded polystyrene) containers and cups, and certain products labelled as biodegradable or compostable plastic such as cups, containers, utensils, and straws.**

Bans on problematic materials and products are being considered at provincial and national levels of government. Initiatives at the City of Victoria will align with higher level regulations and will consider accessibility requirements. The implementation timeline of potential new regulations will also accommodate Victoria businesses' ability to source alternative products and use up existing stock.

Several jurisdictions in BC have enacted bans on single-use plastic checkout bags, plastic straws (with accessibility requirements in place), and polystyrene cups and/or containers, including the City of Richmond, Districts of Tofino and Ucluelet, and the City of Vancouver. These bylaws also prohibit "biodegradable" or "compostable" plastic bags or straws.

<sup>19</sup> Metro Vancouver Solid Waste. Single-Use Item Reduction Toolkit. Retrieved from: [http://www.metrovancouver.org/services/solid-waste/SolidWastePublications/Single-Use\\_Item\\_Reduction\\_Toolkit.pdf](http://www.metrovancouver.org/services/solid-waste/SolidWastePublications/Single-Use_Item_Reduction_Toolkit.pdf)

<sup>20</sup> Ibid.



Photo credit: GoBox

### Require Reusable

A reusable requirement is a policy tool used to mandate that reusable products are used in specific situations. Typically, reusable requirements are applied to restaurants offering dine-in services. In most cases reusable food service ware is less expensive for a business than the disposable alternative if dishwashers are already in use.

**A requirement to use reusable food service ware is being considered for dine-in restaurants and cafes in Victoria.** Additional consultation and analysis will be completed to identify space and operational requirements that may limit the application of this policy option.

Several jurisdictions in California including the City of Berkeley, Culver City and Santa Rosa have enacted legislation requiring that food service businesses offering onsite dining may only use reusable (durable/washable) food service ware to serve customers eating on the premises. The legislation allows for food vendors to either provide cleaning and sanitation facilities on-site or contract with a third-party service for off-site cleaning.

## Accessibility Considerations

The *City of Victoria's Accessibility Framework* and *Accessibility and Inclusion Policy* commit to providing accessible facilities, services, regulations, programs and employment to proactively remove and prevent barriers faced by individuals in our community. The City is committed to removing barriers and increasing participation in the development of single-use item reduction policies.

Impacts to accessibility and equity need to be considered to ensure City programs and policies do not create additional burdens on businesses and the community. For example, packaging can facilitate affordable, safe and reliable access to food while some single-use items support accessibility for individuals with disabilities, such as plastic straws.<sup>21</sup> Targeted engagement with service providers, associations and people with lived experiences will be conducted to understand and mitigate barriers of potential single-use item reduction policies.

Plastic straws have already been identified as a single-use item for consideration under a by request policy to ensure they remain available for individuals who need them for health, safety or accessibility reasons.

### Providing Feedback

The City of Victoria is inviting feedback on proposed policies to reduce single-use items through an online survey available at [engage.victoria.ca/reducesingleuse](https://engage.victoria.ca/reducesingleuse). People without access to the internet or a computer can also request paper versions of the survey by calling 250.361.0210.

Responses received by November 22, 2021, will be considered by the City of Victoria in preparing single-use item reduction policies.

21 City of Toronto Single-Use and Takeaway Items Public Consultation Report (2019). Retrieved from: <https://www.toronto.ca/wp-content/uploads/2019/09/98a6-2019-9-3-SWMS-SingleUseItems-Report-FINAL-AODA.pdf>