

Small Business Perspective on Reducing Single-Use Plastic Pollution

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On behalf of the 10,000 small and medium-sized businesses the Canadian Federation of Independent Business (CFIB) represents in British Columbia (BC), this submission presents the perspective of business owners on a path forward to reducing the harmful outcome single-use plastic items have on British Columbia's ecosystems. While CFIB respects the 5-page limit, we have also included member comments from a survey issued to 650 small business owners in BC between Aug 20 and Sept 3, 2019 on the subject of single-use plastics. We feel their comments will greatly help the consultation.

Single-use packaging and plastics ban

Do small business support a ban on plastic packaging and/or single-use items?

Banning single-use plastics would address one of the **biggest environmental concerns**

for **58%** of BC small business owners.

Source: CFIB Survey on Red Tape, Recycling, and Single-use Plastic Bans, Aug 20 – Sept 3 2019, n=650 for BC

Out of 650 BC small business owners surveyed in 2019, 78 per cent indicate support for some form of ban on single-use plastic items (see Figure 1).¹ That being recognized, it is equally important to understand what challenges small business would face if a ban were to be implemented.

The following figure captures both the level of support small business owners have on banning single-use plastics, and the level of difficulty they would face to adjust. From Figure 1, we also establish that it would be challenging or very challenging for 46 per cent of small business owners to adjust to the ban.²

¹ Figure 1, addition of "I support it in principle but not in practice as it would be very challenging for me to implement" (8%), "I support it in principal and practice even though it would be challenging to implement" (30%), and "I support it and it would be easy for me to implement" (40%).

² Figure 1, addition of "I support it in principle but not in practice as it would be very challenging for me to implement" (8%), "I support it in principal and practice even though it would be challenging to implement" (30%), and "I don't support it and it would be challenging for me to implement" (8%).

Figure 1

Which of the follow best captures your view on banning single-use plastics?



Source: CFIB Survey on Red Tape, Recycling, and Single-use Plastic Bans, Aug 20 – Sept 3 2019, n=650 for BC.

Better understanding of how a ban on certain single-use plastics would impact small business is also needed to ensure policy can be better targeted to ensure a smooth transition, with minimal negative externalities to the economy and to the supply chain.

79% of BC small business owners agree the overall costs to business of a single-use plastics ban should be well understood before any government proceeds.

Source: CFIB Survey on Red Tape, Recycling, and Single-use Plastic Bans, Aug 20 – Sept 3 2019, n=650 for BC

Analysis on the cost of a single-use plastics ban to small business and the economy should be thoroughly conducted and publicly released through consultations and webinars to ensure the implications are fully understood. The vast majority of small business owners in BC agree costs must be well understood before any government proceeds with a single-use plastics ban.

While the majority of small business owners in BC do support a ban, it is important to note that bans on different items will be received differently. Small business owners from a variety of sectors have voiced concern that a ban on specific single-use items used in their industry

would be devastating. Others have voiced concern that a ban could cause immense confusion for their business if an effective, easy to use system is not put in place. The comments below from small, independent businesses in BC help highlight some of the issues that would arise for them if a single-use plastics or plastic-like packaging ban was placed on specific items used in their industry. Their concerns are justified, as the terms of this consultation are not limited to specific items.

As someone in the healthcare profession we have a lot of single use plastics used as necessary barriers to prevent cross contamination between patients. If this were to become regulated by someone who has little to no knowledge or experience in my field it would become a giant hassle.

- *Dental Clinic*

The real problem is not the sale and use of the plastic items, but the inability to simplify the recycling process to a point that everyone buys in and recycles. If it is inconvenient and confusing, which it is, a lot of people will not comply

- *Retail business*

We are a butcher shop so paper bags are not a reasonable alternative for frozen products. There are no feasible alternatives for what we currently use; everything is recyclable but many containers are single use plastic. Cost effective alternatives need to be in place before a complete ban occurs. Education of the consumer needs to be clearer & more effective. I recycle religiously and I still get confused.

- *Specialty foods store*

Some of our products are imported in plastic bags, we would have to re package them which would mean extra waste, time and money.

- *Specialty fishing store*

We would need an alternative for the plastic shrink wrap and plastic corners we use to package our skids on concrete - which are often outdoors prior to shipping and even during the shipping process. We use plastic corners, plastic bead board, and shrink wrap during this process. We also use styrofoam strips between pieces of concrete to keep them separated during shipping in order that they don't chip or bang together. We would need alternatives to these products, and none have been proposed.

- *Exterior construction*

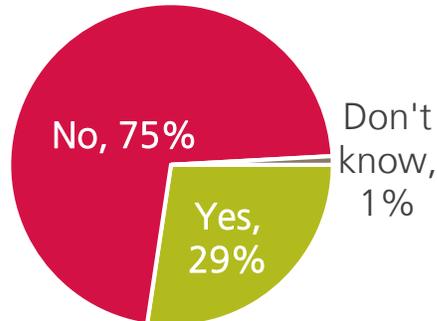
What type of ban should be considered?

A single-use plastic ban could either regulate their sale or restrict their disposal. It is important to note that either type of ban will impact small business.

Roughly 1 in 3 small businesses offer single-use plastic items (such as plastic straws, bags, dinnerware/cutlery, or take-out containers) to their customers (see Figure 2). BC businesses are also responsible for the disposal of plastic goods they use in-house. With that in mind, it is likely a disposal ban would have an impact on the broader small business community. That being said, the collective burden between a disposal ban versus regulating the sale or use of single-use plastics can only be understood through thorough, additional analysis. **CFIB recommends any analysis on the impact of either ban is conducted and publicly released through consultations and webinars to ensure accountability and transparency of their impacts.**

Figure 2

Does your business offer single-use plastic items (e.g. plastic straws, plastic bags, plastic dinnerware and cutlery, plastic take-out containers, etc.)? (Select one answer only)



Source: CFIB Survey on Red Tape, Recycling, and Single-use Plastic Bans, Aug 20 – Sept 3 2019, n=650 for BC.

Who should have the authority to introduce a ban?

Before any form of single-use plastics ban is introduced, the overall costs to business should be well understood. In addition, it is essential that environmental benefits are clearly understood.

92% of BC small business owners agree **environmental benefits** of a single-use plastics ban should be **clearly understood** before any government proceeds.

Source: CFIB Survey on Red Tape, Recycling, and Single-use Plastic Bans, Aug 20 – Sept 3 2019, n=650 for BC

CFIB is concerned that allowing all levels of government to introduce bans on single-use items as they see fit could diminish the value of ensuring costs and environmental implications are fully understood. Small business owners feel these standards are vitally important, and it is essential they are upheld.

In addition, vastly different municipal regulations could lead to distorted competition and add significant red tape barriers to businesses that operate in multiple municipalities. **Therefore, CFIB recommends, as a result of this consultation, additional authority on implementing a ban on single-use items should not be given to BC municipalities.**

The federal government has made promises to ban certain single-use plastics as early as 2021.³ Improving interprovincial trade within Canada is an important task we must undertake, and ensuring regulatory requirements align across the country will help streamline this process. **CFIB strongly urges the BC government to work with the federal government to ensure any ban**

³ [BBC News, Canada to ban single-use plastics as early as 2021, June 10 2019.](#)

of single-use items does not increase the regulatory burden small business face. This means working together with other provincial governments and the federal government to ensure single-use item bans are consistent across Canada.

Reducing single-use plastic in landfills and waterways

To achieve our goal of reducing single-use plastic in landfills and waterways, it is important that responsibility falls to everyone – not just manufacturers, distributors, and retailers.

[The Plastics Action Plan policy consultation paper](#) suggests Extended Producer Responsibility programs reduce waste by incentivizing producers to design recyclable products so they can be recovered for future use. For this circular economy to work, the consumer must also understand how to properly recycle the good. In B.C., the recovery rate for residential plastics in 2018 was only 42 per cent, meaning less than half of recyclable goods are being properly disposed.⁴

31% of small business owners find BC's recycling rules confusing.

Source: CFIB Survey on Red Tape, Recycling, and Single-use Plastic Bans, Aug 20 – Sept 3 2019, n=650 for BC

While B.C. is ahead of the Canadian average (9 per cent)⁵, we still have a lot of room for improvement in our province. Consumers need the right tools and knowledge to properly dispose of plastics currently included in the Recycling Regulation. Nearly one-third of BC small business owners find the Province's current recycling rules confusing, a sentiment surely felt by residents as well. Recycle BC's most recent consultation summary⁶ repeatedly indicates there is confusion among residents regarding which items are recyclable and which are not.

The current system clearly needs improvement. CFIB recommends that before adding single-use plastics items (such as disposable cutlery and ziplock bags) to the Recycling Regulation, we must first determine an efficient, effective way for both businesses and residents to recycle these products. Further consultation with businesses and residents is needed to ensure any changes to BC's recycling system (including EPR) make a meaningful impact on reducing single-use plastics in BC's ecosystems.

⁴ [RecycleBC 2018 Annual Report](#)

⁵ [Recycling Council of Ontario](#)

⁶ [Consultation Summary, Recycle BC, Packaging and Paper Product Extended Producer Responsibility Plan, June 2019](#)

Summary of Recommendations

CFIB advises the BC Government to:

1. Conduct further analysis on the costs a single-use plastics or packing-like products ban would have on small business, especially those in industries hit hardest;
2. Conduct further economic analysis on the impact of issuing a single-use plastics disposal ban versus regulating the sale and/or use of single-use plastics to small business;
3. Do not introduce legislation that would give BC municipalities authority to implement additional bans on single-use plastics or packaging-like products;
4. Work cooperatively with the federal government and other provinces to ensure any bans on single-use plastics or packaging-like products are consistent across Canada;
5. Ensure there is an efficient, effective way for residents and business owners to recycle single-use plastics and packaging-like products before making adjustments to BC's Recycling Regulations;
6. Hold further consultation on potential changes to BC's EPR program to ensure any changes make a positive, meaningful impact on reducing single-use plastics in BC's ecosystems.
7. Consider how to help businesses that will be impacted the most by a plastics ban, and work with the business community to create solutions that are effective, efficient, and easy to comply with.
8. Ensure business owners are given sufficient time to learn, adjust, and adapt to any changes to regulation single-use plastics and packaging-like products. Do not penalize businesses who are in the transitional period.

Comments from small business owners

The following comments were collected in the CFIB *Survey on Red Tape, Recycling, and Single-use Plastic Bans*, conducted Aug 20 – Sept 3 2019, with 650 responses in BC. If interested in reviewing all comments made on single-use plastics and recycling, please reach out at ms.bc@cfib.ca and we would be happy to supply the full list.

Business Industry	Comment(s)
Food	Single use plastics are strictly determined by the end user eg. consumer. You can use a straw, bag or container more than once and then it becomes a multi-use plastic, not a single use. Consumers, as well as business needs to be more aware of alternatives and to try and curb/re-use their consumption of plastics, paper and other consumer packaging.

Dairy Farming	<p>We have introduced paper bags for our customers, but if the product is damp, paper does not have the strength that plastic has. There are time where plastic is the appropriate material. Education of customers has had a greater impact on the amount of bags we use, as customers will decline the use of a bag, or bring their own.</p>
Fabricated Metal Product Manufacturing	<p>I think the ban on plastics should not be done as an outright ban, but in stages, where a cost effective and reasonable alternative will not cause a significant loss of business or cost increase. Yes people can bring their own shopping bags, and stores can place foods into paper fiber boxes etc.</p> <p>We on the other hand, if we have to increase our prices enough to recover the cost of switching our product packaging from bags to itsy bitsy tiny boxes, nobody would buy those parts from a Canadian supplier any more, and since those are the parts that ultimately keep us in business, a company like ours may not survive the transition, and all our staff at all branches would lose their jobs.</p>
Retail	<p>Local bylaws on single use plastic bags should be based on a provincial government outline. This would help with creating a streamlined approach for businesses operating in different municipalities.</p> <p>The provincial environmental ministry should be developing strong well thought out guidelines to protect all parties from legal action as a result of a poor policy.</p>
Automotive Repair and Maintenance	<p>In my auto repair shop, we receive multiple parts wrapped in plastic every day. A ban (or even a limitation) on plastic packaging would significantly reduce waste disposal fees, as well as reduce the amount of time spent cleaning up and disposing of packaging.</p>
Building Material and Supplies Dealer	<p>Regional district made it so all business had to recycle cardboard. But waste management bought out all the competition and has more than tripled the rates since this started less than three years ago. At the same time, it is free for residential people. So the big companies (THE AMAZONS ETC) that ship everything to at 10 times the plastics and cardboard do this all for free. We have to pay to get rid of cardboard. Now we can't use plastic to help our customers get the items home. But if you ship it to the customers one at a time that is all ok for some reason.</p>
Retail	<p>We have been transitioning customers to new compostable and degradable items for years now. There are 4 major problems: 1. some items do not have an adequate alternative; 2. customers are not willing to switch for price reasons; 3. there are so many items, that trying to regulate would end up including some items that should not be regulated; and 4. the resources used to create the alternative is quite often greater than the plastic solution. The real problem is not the sale and use of the plastic items, but the inability to simplify the recycling process to a point that everyone buys in and recycles. If it is inconvenient and confusing, which it is, a lot of people will not comply. These are the same people that do not think that their actions have an impact on others. Recycling is too confusing and limited residentially and almost non-existent for business.</p>

Telecommunication	There are so many other products to use in place of oil-based plastics, such as Hemp, which are not being given enough attention. Alternative resources must be given more leeway (taxes, levies, trade) to replace our current single-use plastics.
Furniture	Plastics are grabbing all the headlines right now but are not necessarily the worst offenders. We have to be as sure as we can that the solutions are better than the problem. Anytime we can reuse and reduce it is a win for sure, but replacing or recycling may not be a net win every time.
Foundation, Structure/Exterior Construction	We would need an alternative for the plastic shrink wrap and plastic corners we use to package our skids on concrete - which are often outdoors prior to shipping and even during the shipping process. We use plastic corners, plastic bead board, and shrink wrap during this process. We also use styrofoam strips between pieces of concrete to keep them separated during shipping in order that they don't chip or bang together. We would need alternatives to these products, and none have been proposed.
Printing	Although society is making progress related to recycling, more could be done. Shrink-wrap, for example, is not recyclable, but plastic bags are. Maps printed on plastic are not recyclable, although there is no reason for this, as they are easily recycled. Most recyclers in the Vancouver area will not accept books for recycling; fortunately, the City of Vancouver does. Commercial concerns usually use a dumpster, as garbage pick-up is not provided, so much recyclable material is dumped; no recycling opportunities exist.
Specialty Foods Store	<p>We are a butcher shop so paper bags are not a reasonable alternative for frozen products. We also produce our own products (meat pies, sauce, marinades) There are no feasible alternatives for what we currently use; everything is recyclable but many containers are single use plastic.</p> <p>Cost effective alternatives need to be in place before a complete ban occurs. Education of the consumer needs to be clearer & more effective. I recycle religiously and I still get confused.</p>
Graphic, Industrial, Interior Design	We handle our own recycling and we believe very strongly in it and keeping our environment clean. Giving businesses lots of notice of changes would help so we do not purchase products that are then going to be banned.
Clothing Retail	As a retail store, we use plastic bags in our sales. We do encourage our customers to bring in their own bags. To switch to paper style backs will increase our bag cost by 4 times.
Furniture	<p>In the furniture industry we wrap all things well enough that they are not damaged in transit, but train, truck etc. There is a lot of styrofoam, cardboard and plastic. Regulations have impacted our business. We do our best to separate out the different materials when we unwrap furniture but it is very time consuming. I don't really know a solution.</p> <p>There seems to be a lot of waste. Possibly re-useable materials? But shipping wrapping material would also cause ugly problems.</p>

Fishing	Some of our products are imported in plastic bags, we would have to re package them which would mean extra waste, time and money.
Full-Service Restaurant	<p>We have a full service restaurant as part of our operation and we use all of those items listed, however we choose to spend additional money to use biodegradable options on all take-out containers, straws, bags for customers etc. in order to reduce or in most cases eliminate our single use plastic use. We do this to be environmentally responsible, not because there are any incentives to do so. We are also then subject to all of the harsh enviro fees, same as a business using all single use plastic items, styrofoam etc. - all of which are readily available. Get rid of enviro fees that everyone knows is nothing but a tax grab and offer incentives for companies that manufacture biodegradable products. Any taxation, money grab or penalties should be collected at the manufacturing level - not on retail!!</p> <p>With all the money we are paying in additional property taxes, CPP (absolutely outrageous increases by the way), excise tax annual increases, enviro fees and fuel surcharges as well as increases to minimum wages for student help and the overall cost of everything going through the roof - there is not much left to even consider being able to innovate or consider adopting cleaner technologies. Leave more money in the hands of small business and we will do the right thing!! Small business owners care about the environment and the impacts on their own community.</p>
Photography Services	Municipal law in Victoria BC, has forced me to charge for non-plastic bags. This is a considerable issue for us, as each manufacture product is packing into re-usable paper bags and boxes. We charge up to \$5,000 for custom orders and adding a bag fee looks and feels petty. It also severely cut into our branding and marketing. Stop making us charge clients for reusable paper packaging. The city of Victoria has had a plastic bag ban in place for about 6 months. I had already removed plastic bags from my check-out 6 years ago. Now I am being forced to charge clients for re-usable bags. I agree with a plastic bag ban, but don't agree with the government telling me what I have to charge for the alternatives. This is a major branding issue for me as a business.
Hotel	At present we use plastic cutlery when we have tour buses in. The ONLY reason we do that is because BC Health says that using our dishwasher to clean dishes / cutlery is ok for staff. It is ok for every family in North America. But it's NOT ok for our guests. They require that we soak all dishes and flatware in a bleach solution AFTER they have gone through the dishwasher. This process is too time consuming and too labour intensive. So, get rid of the law that says a dishwasher cleans dishes well enough for EVERYONE in the world except guests and we don't need to use plastic cutlery.

Jeweller, Luggage, and Leather Stores	I come from an area that pays the person for their cardboard, plastics, and other items, BY WEIGHT. Here we pay a recycle fee, or environmental fee , or a Carbon Tax , but see no benefits other than for the Government coffers and the recycle companies that profit at our expense. There are OTHER WAYS to encourage people and business to recycle that are effective. TAX is not one of those ways.
Dental	As someone in the healthcare profession we have a lot of single use plastics used as necessary barriers to prevent cross contamination between patients. If this were to become regulated by someone who has little to no knowledge or experience in my field it would become a giant hassle.
Book and Music Retail	Many of our suppliers use an extraordinary amount of plastic bubble wrap in packing our products to us, causing us so much extra work to recycle and dispose of it all.
Full-Service Restaurant	We already use compostable 'plastic' bags, compostable straws made from plant protein, as well as compostable take-out items, so if everyone was regulated to use these environmentally friendly alternatives, we should the price come down on these items, as buying power drives the market. In addition there may be more options for composting our organics and returning recyclables if everyone in this industry was forced to find these alternatives.
Health, Fitness Facility	We currently ban single use plastics in our business and wish there were government incentives to help offset the costs of alternatives. The lifecycle costs saved by eliminating single use plastics should be used to offset alternatives. Alternatively, changes to health regulations regarding food and drink should be considered to allow customers the choice to bring their own containers.