



CANADIAN FEDERATION OF INDEPENDENT GROCERS - FÉDÉRATION CANADIENNE DES ÉPICIERS INDÉPENDANTS

105 GORDON BAKER ROAD, SUITE 401, TORONTO, ON M2H 3P8

October 1st, 2019

Hon. George Heyman,
Minister, Environment and Climate Change

Dear Minister:

As you and your Ministry are no doubt aware, the Government of Canada has recently announced steps to ban certain single-use plastics by as early as 2021. Four provinces have also recently indicated they too will be bringing forward similar bans. The Canadian Federation of Independent Grocers (CFIG) recognize that plastic waste is an issue that is a global challenge and one that impacts the environment we all share. Indeed, that recognition was the reason that 10 years ago, CFIG was one of the original 3 trade associations that partnered with a number of provinces, including British Columbia, in bringing forward a plastic bag reduction agreement. This strategy was very successful and dramatically reduced the number of plastic bags in circulation at the retail level.

CFIG also supports the need to develop an action plan that can reach the objective of a circular plastic economy, as was endorsed by the Canadian Council of Ministers of Environment (CCME) earlier this year. But in our view, it is critical that to achieve this goal, governments must work with stakeholders such as CFIG through a measured and collaborative approach.

To date, there has been little to no outreach with stakeholders from any province with groups such as CFIG, to discuss this issue. Yet the impact of a preemptive full ban, without the aforementioned consultation and review, will pose more significant challenges for the small and medium size business enterprises that largely populate the retail food sector.

For example, within the context of an overly consolidated retail food industry, the large retail chains have the ability to have lower to almost negligible charges for paper, compostable or re-usable checkout bags. They can do such simply by virtue of their scale or by asking suppliers to help offset those costs. This would therefore result in an environmental initiative, albeit unintentionally, being used as a point of competitive advantage over the small and medium size retailers in your province. We would urge all provinces contemplating plastic ban legislation, to adopt, as has the Government of Prince Edward Island, corollary regulations that set in place minimum and reasonable pricing for paper and all re-usable checkout bags.



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As well, in the retail food industry, we have food safety practices and regulatory requirements in place that are not faced by other retail sectors in the same manner or degree. A critical component of food safety is to minimize the risk of biological, chemical and physical cross contamination, particularly when dealing with meat products. The national Retail Food Safety Program that we developed in collaboration with the Canadian Food Inspection Agency (Approved December 2006 and which was vetted by all provinces under the AAFC Going Forward initiative) points out the need to package certain products in a way that is separate from other foods, so as to reduce contamination risks. The current standard, and prevalent practice, is to do so with plastic. This also applies to the transportation of food, where the use of plastic prolongs shelf life, reduces food waste and ensures fresher product for consumers, particularly in rural or more remote locations.

As well, Health Canada has also advised that:

“Putting fresh or frozen raw meat, poultry or fish in plastic bags will help prevent the juices from leaking out and contaminating other foods. The clear bags found in the produce and some meat sections work well for this. Fresh produce should also always be put in plastic bags to protect it from contamination.” (Health Canada, Advisory, June 24, 2009.) So it needs to be also be clearly recognized that there are risks associated with reusable grocery bags, and the need for relevant government departments and stakeholders, to be engaged in a collaborative strategy.

There are currently a myriad of products available in retail grocery stores that will need time to change and adapt to the imposition of a regulatory ban on single use plastic. As well, there needs to be time to study any and all alternative packaging solutions that are being brought forward as viable substitutes that are more environmentally favourable than plastic. Without such a breathing space, unilateral regulatory bans, will pose economic and logistical challenges for the entire supply chain and on behalf of our members, we must restate that the impact of such is disproportionately more significant for SME's in Canada.

We wish to underscore that our concerns are not in any way to be interpreted as not being supportive of the need to move to the more circular plastic economy endorsed by the CCME. It is simply that we know more time is needed to move to this objective which will allow more time to facilitate discussion and collaboration.

Industry, government and the public need to know what the full impact of a single use plastic ban will be and to afford them the time to become more informed and adapt exiting practices and find alternatives that meets regulatory requirements and the needs of Canadian consumers.



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In your capacity as your province's Minister of the Environment and Climate Change, we would ask that our perspective and concerns be shared with appropriate Cabinet colleagues in the government. We also look forward to discussing this issue further with you and other stakeholders.

Sincerely,

Gary Sands
Senior Vice President, Public Policy & Advocacy

c. Mark Zacharias, Deputy Minister