

September 26, 2016

Honourable Perry Trimper  
Minister of Environment and Climate Change and MHA for Lake Melville  
Confederation Building, East Block  
P.O. Box 8700  
St. John's, NL  
A1B 4J6

Honourable Eddie Joyce  
Minister of Municipal Affairs  
MHA for Humber-Bay of Islands  
Confederation Building, West Block  
P.O. Box 8700  
St. John's, NL  
A1B 4J6

Dear Ministers Trimper and Joyce:

The Canadian Federation of Independent Business (CFIB) is a non-partisan, not-for-profit organization representing independently-owned small and medium-sized businesses. We have over 2,000 members in Newfoundland and Labrador.

In recent days, there has been significant media interest in a province-wide plastic bag ban being proposed by a number of councillors in some municipalities. In Newfoundland and Labrador, consultations with CFIB members show they place recycling of materials as one of the most important environmental issues for their business, but they disagree additional regulations need to be created to address the issue. On their behalf, CFIB would like to request the Government of Newfoundland and Labrador take a cautious approach to a province-wide plastic bag ban.

Amongst our membership, those involved in the retail and hospitality sectors are most likely to have a mixed view on the need for a plastic bag ban. They are influenced and motivated by their personal views and the potential for cost savings. Many will see a plastic bag ban as a viable effort to help protect the environment and as an opportunity to increase the purchase of reusable bags in the province. However, others will see a plastic bag ban as an unnecessary regulatory burden to control individual behaviour like releasing the plastic bags into the environment.

Other provinces in the Atlantic region are moving away from a reliance on regulation and looking for alternatives to meet policy objectives. Newfoundland and Labrador could also show leadership in this area by resisting the need to impose regulatory requirements, but instead focusing on education and incentives to change behaviour.

Fogo Island has been noted as an example of where a plastic bag ban is working. It is important to note the ban on Fogo Island is voluntary and not a regulatory requirement. In 2015, business owners agreed to remove plastic bags from their businesses entirely and use cloth bags and paper bags, or even boxes when necessary. It is my understanding from recent discussions with business owners on Fogo Island that a few businesses have continued with this initiative because it has not only been a benefit to the environment, but has also been a cost savings to them (for instance, a case of 1000 plastic bags costs approximately \$40). Regardless, many have re-introduced plastic bags due to customer demand. For some customers, paper bags were not as strong as plastic bags, especially on wet days. As a result, there is a need, from a customer service perspective, to have a plastic bag available as an option.

In Newfoundland and Labrador, the provincial government has committed to implementing the Provincial Waste Management Strategy (Strategy). In some parts of the province, especially on the island portion of the province, the Strategy has meant significant growth in the cost of garbage collection and disposal for small business owners. In addition, waste and recycling services available in eastern and central Newfoundland have not been introduced in western Newfoundland. We have yet to fully comprehend the true costs associated with waste and recycling in the province, so it is imprudent to implement a plastic bag ban without knowing what the economic and environmental impacts will be.

Without doubt, misuse or inappropriate disposal of plastic bags is of great concern, but an outright ban on plastic bags may not be the answer. Therefore, CFIB makes the following recommendations:

- Adopt an education and awareness campaign on the need to use cloth bags and re-use single-use plastic bags;
- Undertake an economic and environmental impact analysis prior to the implementation of a plastic bag ban; and
- Municipal leaders should work with small business owners in their respective communities on how best to reduce the number of plastic bags used in their businesses.

I am prepared to discuss this at your convenience. You may reach me by phone at 753-7745 or by email at [vaughn.hammond@cfib.ca](mailto:vaughn.hammond@cfib.ca).

Sincerely,



Vaughn Hammond  
Director of Provincial Affairs, Newfoundland and Labrador

Copy: Honourable Dwight Ball, Premier  
Mayors and Councillors of the 25 largest municipalities