



# City of Richmond

## Report to Committee

**To:** Public Works and Transportation Committee  
**From:** Suzanne Bycraft  
Director, Public Works Operations  
**Re:** Reusable Containers Review

**Date:** August 18, 2025  
**File:** 10-6370-01/2025-Vol  
01

### Staff Recommendation

That Option 3, as outlined in the staff report titled "Reusable Containers Review", dated August 18, 2025 from the Director, Public Works Operations, be approved.

Suzanne Bycraft  
Director, Public Works Operations  
(604-233-3338)

Att. 2

REPORT CONCURRENCE		
<b>ROUTED TO:</b>	<b>CONCURRENCE</b>	<b>CONCURRENCE OF GENERAL MANAGER</b>
Economic Development	<input checked="" type="checkbox"/>	 Suzanne Bycraft Acting General Manager
Arts, Culture & Heritage	<input checked="" type="checkbox"/>	
Recreation and Sports Services	<input checked="" type="checkbox"/>	
Climate & Environment	<input checked="" type="checkbox"/>	
Law Department	<input checked="" type="checkbox"/>	
<b>SENIOR STAFF REPORT REVIEW</b>	<b>INITIALS:</b> 	<b>APPROVED BY CAO</b> 

## Staff Report

### Origin

This report responds to the referral from the January 22, 2025 Public Works and Transportation Committee meeting:

*“to accelerate the reduction of plastic pollution, by directing staff to research the feasibility of implementing the use of reusable food containers at restaurants and large events.”*

This report supports Council’s Strategic Plan 2022-2026 Focus Area #5 A Leader in Environmental Sustainability:

*Leadership in environmental sustainability through innovative, sustainable and proactive solutions that mitigate climate change and other environmental impacts.*

*5.1 Continue to demonstrate leadership in proactive climate action and environmental sustainability.*

*5.2 Support the preservation and enhancement of Richmond’s natural environment.*

*5.3 Encourage waste reduction and sustainable choices in the City and community.*

### Analysis

#### Background

An estimated three million tonnes of plastic waste is thrown away across Canada each year. Due to its lightweight nature, plastic can become windblown and/or littered, causing pollution in the natural environment. Through degradation, plastic continues to break down into smaller and smaller pieces, forming what are known as microplastics, which have been detected in air, water, soil, food and beverages, indicating human exposure is pervasive. While medical research is underway on the health implications of plastic pollution, some early studies have detected adverse affects. Reusable alternatives, such as bags, containers, straws and cutlery play a fundamental role in the circular economy by extending the useful lifespan of products, reducing waste and conserving resources.

Through education and enforcement of its *Single-Use Plastic and Other Items Bylaw No. 10000* (Bylaw 10000) which bans plastic checkout bags, plastic straws, and foam food service ware, the City shares information on reusable alternative options for food service providers. The City’s Business Recycling Resources Pilot Program, which is designed to promote greater commercial recycling efforts, is another avenue where staff opportunistically share information on reusables. Both cost and competitiveness are key considerations for businesses when pursuing new options.

## Regulatory Landscape

### *Senior Government Actions*

In addition to the City's enactment of Bylaw 10000, senior levels of government have also implemented policies and regulations to restrict access to harmful single-use items and reduce their prevalence in the environment. Food service operators in Richmond must comply with the City's *Single-Use Plastic & Other Items Bylaw No. 10000*, the provincial *Single-Use and Plastic Waste Prevention Regulation*, and federal *Single-use Plastics Prohibition Regulations*. Attachment 1 provides a summary of items captured under each regulation.

Regionally, Metro Vancouver has created the "Superhabits" behaviour change campaign to encourage reusable food service ware and is developing a guidance document for events to consult when implementing reuse. Metro Vancouver has also contracted Ocean Ambassadors Canada, which is a registered non-profit organization that helps to promote reuse and reduction of single-use items at events throughout the lower mainland.

All levels of government support reuse initiatives, but consistent regulations from senior levels of government would help reduce the confusion caused by varying municipal bylaws, especially since many food service operators work across multiple jurisdictions. Lessons learned from the single-use movement highlight the value of coordinated, higher-level policy.

### *Local Government Actions*

In Canada, initiatives are primarily led by municipalities and often built upon bylaws banning single-use items. The most common actions relating to reusable food service ware that others have enacted are presented in Table 1 below, with further details in Attachment 2.

Table 1: Enacted policy/actions by Canadian jurisdictions

<b>Policy/Action</b>	<b>Jurisdictions</b>
Requiring food service providers to accept customers' own reusable cup/container for take-out	City of Edmonton Town of Banff City of Toronto (cups) City of Guelph Ville de Terrebonne City of Toronto (containers)*
Reusable food service ware required to be provided for on-site dining	City of Victoria City of Edmonton Ville de Terrebonne City of Toronto* Town of Banff
Requiring minimum seating for restaurants (to avoid loophole to take-out only models)	Town of Banff
Fees on disposable single-use items (e.g. to-go coffee cups, plastic/paper food containers)	Town of Banff

Policy/Action	Jurisdictions
Support for reusable cup or container share programs	Town of Banff City of Ottawa District of Saanich (Event Pilot) Metro Vancouver (Education)
Grants for businesses to support transition (e.g. purchasing dishwashers, dishware)	BC Provincial Government Fraser Valley Regional District Capital Regional District Ville de Terrebonne

\*Consultation fall 2025

#### *International Actions*

Policies are also emerging across the globe. Specifically, the European Union's (EU) *Packaging and Packaging Waste Regulation*, which comes into effect August 2026 and will require take-away businesses to offer customers the option to bring their own container. EU member states must also comply with *Directive 2019/904 Single-use Plastics – Fighting the Impact on the Environment*, which bans certain single-use plastics from being placed on the market and requires ambitious reduction of consumption of other single-use plastic products by 2026. The 27 EU member states transposed the directive into national law, with several countries going above and beyond, banning single-use plastics from festivals (Luxembourg), government agencies (Greece), and implementing a plastic tax to disincentive the use of plastics overall (Belgium, Italy). Within the United States, various policies and requirements are being implemented to support and/or require reuse in 5 states and 43 cities.

#### *Industry-led Actions*

The food service industry is also taking action by establishing their own sustainable or circular actions, with some Richmond businesses encouraging customers to reuse cups or bring their own cups offering discounts ranging from \$0.10 to \$3.00 as an incentive.

Additionally, the Richmond School District launched a one month reusable food service ware pilot at J.N. Burnett Secondary School and H.J. Cambie Secondary School during the 2024-2025 school year, partnering with the company Friendlier to pilot reusable plastic containers within their cafeterias. Analysis of pilot results is underway by the School District.

The Richmond Night Market is run by a private operator with authorization from the land owner and is not a City event. It is permitted via a 3-year Temporary Commercial Use Permit, and all vendors are required to abide by all food service operator requirements and single-use regulations. Visitors are able to bring their reusable water bottles and select vendors offer their drinks in special, reusable drink containers.

#### *City of Richmond Actions*

With Council's leadership and commitment to fostering circularity through the *Richmond Circular City Strategy* and the *Community Energy and Emissions Plan*, the City has implemented several initiatives to promote waste reduction and sustainability. These include the Let's Choose to Reuse campaign to encourage reusable options, free recycling bin rentals for community events (supporting 75 events with 962 bins in 2024), and the Green Ambassadors program, where youth volunteers educate the public on proper recycling at major city events.

The Richmond Event Approval Coordination Team (REACT) application process also provides information for event organizers such as the Richmond Sustainable Event Toolkit which includes a 7-step guide to hosting eco-friendly community and major events. For hands on events, the Reuse and Repair Cafes have repaired 987 items and expanded in 2024 to include an item exchange with 283 items reused to date.

### Current Reusables Landscape

The concept of reuse and integration of reusable food service ware is emerging around the world. A review of current service providers and policies/actions by various jurisdictions which are designed to address reusable food service ware is outlined below.

#### *Current Service Providers*

There are currently three active reusable food service ware companies operating within the region; Friendlier, Reusables.com, and ShareWares. These companies provide borrowing platforms that allow organizations, businesses, and events to serve takeout orders in reusable food service ware rather than single-use items. They supply the food service ware, handle collection, and sanitize them for repeated use. The organizer or business then has a choice to offer the reusable food service ware to their customers utilizing a deposit system, or not. Deposit systems shift the cost of lost or damaged food service ware to the customer through a refundable fee at purchase, while no-deposit systems place that financial responsibility on the organizer or business.

Staff considered creating a City-owned reusable food service ware program to eliminate the need for a third-party provider for City events. Due to the significant upfront capital costs to purchase the reusable food service ware, as well as, ongoing storage, cleaning, logistics/coordination and staff resources to manage, it would cost considerably more than working with third party providers.

A preliminary cost analysis has been completed for a sample event of 5,000 attendees with food trucks:

- For an event where a deposit is required, the estimated cost would be approximately \$4,000.
- For an event where deposits are not required, the cost could increase by as much as \$3,000 per event, for a total of \$7,000.

There has been a notable withdrawal of reusable food service ware share programs from restaurants in the region, as market demand and overall reuse infrastructure does not currently support this application. Friendlier and ShareWares have indicated that the best use of reusable food service ware at this time is within closed-loop systems, such as educational institutions, corporate offices, stadiums, or events, as these locations generally have limited food service operators with established contracts, and reduced points of access or egress, which reduces food service ware loss.

## Challenges to Reusables

### *Health Guidelines*

In addition to business licensing requirements, Fire Department inspections and City permits, food service operators, including food trucks, are also required to abide by the *Public Health Act*, *Food Premises Regulation*, *Food Safety Act* and submit a 'Food Safety Plan' and 'Sanitation Plan' to their local health authority for approval. These plans address how the business will prevent customers from becoming sick after eating their food, and ensure the premises is maintained in a clean and sanitary manner. Should a business wish to implement or accept reusable food service ware, amendments to these plans must be made and approved by an Environmental Health Officer.

To help food service operators navigate these requirements, the Province developed the *Provincial Policy on the Use of Reusable Food Containers in Food Premises in British Columbia*, which provides a framework that must be met to protect the health and safety of customers when food is dispensed in reusable food service ware, including a customer's own container.

Vancouver Coastal Health also has templates and examples of these plans in their Food Premises Orientation Package which can be found on their website and recently updated their Food Safety & Sanitation Plan Template to discuss reusable food container programs. However, staff note there remains room for further clarity and templates specific to the use of reusable food service ware to reduce barriers for restaurants and food trucks.

### *Implications for Businesses*

In addition to health authority requirements, transitioning to reusable food service ware in restaurants and food trucks often involves significant financial and operational adjustments, such as high upfront implementation costs, difficulty amending health plans, limited dishwashing infrastructure, increased water and electricity for washing and inadequate space to handle reusable food service ware safely to prevent cross-contamination. Current customer preference for the convenience of single-use items adds another challenge.

However, it is important to note that the integration of reusable food service ware with a deposit fee model has resulted in cost savings over time for businesses<sup>1</sup>. The more a reusable item is used, the lower the overall cost in comparison to the disposable item it replaces. Cost savings occur as a result of no longer purchasing single-use items on a regular basis and no longer needing to pay for waste disposal of the single-use items after use. Reusable food service ware can also act as incentive to draw in customers, as they are often a more pleasant dining experience, exhibit lower greenhouse gas emissions and typically use less water over its lifecycle.

### *Legal Authority*

As regulation of the natural environment falls under the *Spheres of Concurrent Jurisdiction* with the Province, based on recent decisions, the City is likely required to submit any future bylaws regulating reusables to the Minister of Environment and Parks for approval.

---

<sup>1</sup> [https://www.sustain.ubc.ca/sites/default/files/2024-039\\_Case\\_Studies\\_Reusable\\_Food\\_Service\\_Ware\\_Wiehr.pdf](https://www.sustain.ubc.ca/sites/default/files/2024-039_Case_Studies_Reusable_Food_Service_Ware_Wiehr.pdf)

## Options

As a next step to encourage circular behaviours in the community, staff have identified the options below for Council's consideration:

### *Option 1 – Continue Education Plus Advocate for Provincial Requirements*

Under this option, staff will continue to enforce Bylaw 10000, educate businesses on alternative options to encourage reuse, continue the Let's Choose to Reuse behaviour change campaign and look for opportunities to expand the City's Reuse and Repair Cafes. Staff will also update the Richmond Sustainable Event Toolkit and 7 Step Quick Guide to provide tips and resources to encourage reusable food service ware at events within the city.

This option would also include advocacy to the Province by writing a letter to the Minister of Environment and Parks to encourage reuse and reusable food service ware share programs by amending the *Single-Use and Plastic Waste Prevention Regulation* to include requirements and actions for reuse. This option would ensure that Richmond businesses are not put at a competitive disadvantage with other businesses in the province by bearing any additional costs or other challenges that may come with incorporating reusable alternatives into their businesses.

### *Option 2 – Stakeholder and Community Consultation and Engagement*

Under this option, two phases of consultation would be undertaken regarding reusable containers. The first with restaurants, food trucks and stakeholder industry organizations to gain insights on effective strategies and to understand the opportunities and challenges faced by food service operators in implementing reusable food service ware at restaurants and large events. This consultation would include surveys, workshops, site visits, and other activities.

The second phase would involve consultation with residents as part of raising awareness about the benefits and opportunities of reusable food service ware, and public opinion on policy approaches.

This option is estimated to take one year to complete and cost \$100,000, for community engagement, education and promotion, as well as staffing costs. Staff would report back to Council with an engagement report, including an assessment of future options to support reusable food service ware in the community for consideration. This one-time cost could be funded from the Solid Waste and Recycling Provision if selected.

### *Option 3 – Advocate for Provincial Requirements Plus Pilot Program (recommended)*

This option includes Option 1, with the addition of implementing a reusable food service ware pilot program at two City events, the Cherry Blossom Festival and Farm Fest for 2026. These events would make excellent pilots as the attendance is approximately 5,000 people, there is a limited and defined event area and a manageable number of food vendors. City staff will work with vendors to voluntarily trial reusable food service ware to establish feasibility. There will be no additional costs to participating food trucks or customers.

Subject to approval from Vancouver Coastal Health through the REACT application process, the City will engage a reusable food service ware company for the two events, with an estimated cost of \$14,000, which can be accommodated within existing Solid Waste and Recycling program budgets.

This expanded option will allow staff to determine the feasibility of integrating reusable food service ware as part of City-supported events and identify any challenges or barriers, while advocating for provincial policy levers to regulate reuse on a broader scale. Staff will report back to Council with lessons learned from the two events including feedback from participating food vendors and general public feedback, as well as an assessment of future options to support reusable food service ware in the community for consideration.

### **Financial Impact**

The recommended Option 3, has an associated cost of \$14,000 which can be accommodated within existing Solid Waste and Recycling program budgets.

### **Conclusion**

As a next step towards circularity in Richmond, staff are seeking Council endorsement to initiate Option 3, which includes advocating to the Province for broad actions to support reusable food service ware adoption, and a pilot for reusable food service ware at two City-led events. These initiatives align with recommended actions in the *Richmond Circular City Strategy* and the *Community Energy and Emissions Plan*.

Piloting reusable food service ware presents a valuable opportunity to test feasibility and work towards enhancing Richmond's approach to encourage reusable food service ware at City-supported events on a broader scale, reduce single-use items and advance the City's transition toward a more circular economy.



Kristina Grozdanich  
Manager, Recycling and Waste Recovery  
(604-244-1280)






KG:kg

- Att. 1: Comparison of Bylaw 10000, Provincial and Federal Regulations  
2: Approaches by Other Jurisdictions



## Consolidated Summary of Bylaw 10000, Provincial and Federal Regulations

## Summary of Federal, Provincial and City of Richmond Single-Use Regulations

<b>SHOPPING BAGS</b>   Designed to carry goods purchased from a business (e.g., grocery or retail store), typically provided to a customer at the point of sale.		<b>REGULATION</b>
Plastic (including plastic labelled "compostable" or "biodegradable")		<b>Banned X</b>
Paper		Fee (must charge \$0.25 or more) 40% recycled content
Reusable		Fee (must charge \$2.00 or more) Must be machine washable 100 times
<b>CUTLERY</b>   Includes forks, knives, spoons, chopsticks and splash plugs.		<b>REGULATION</b>
Plastic (including plastic labelled "compostable" or "biodegradable")		<b>Banned X</b>
All other alternative materials		By request
<b>STIR STICKS</b>		<b>REGULATION</b>
Plastic (including plastic labelled "compostable" or "biodegradable")		<b>Banned X</b>
All other alternative materials		By request
<b>DISPOSABLE ACCESSORIES</b>		<b>REGULATION</b>
Condiment sachets, garnish (e.g., drink umbrellas, plastic sushi grass), napkins, wet wipes, cup lids, cup sleeves		By request
<b>DRINKING STRAWS</b>		<b>REGULATION</b>
Plastic straws (including plastic labelled "compostable" or "biodegradable")		<b>Banned X</b>
Non-plastic drinking straws		By request
<b>FOOD SERVICE WARE: POLYSTYRENE FOAM</b>		<b>REGULATION</b>
Clamshell containers, bowls, cups, platters, trays etc.		<b>Banned X</b>
<b>FOOD SERVICE WARE: IMMEDIATE CONSUMPTION</b>   Designed for serving or transporting food or beverage that is ready to be consumed. Includes clamshell containers, lidded containers, boxes, cups, plates or bowls.		<b>REGULATION</b>
#3 plastics PVC, PVDC, oxo-degradable plastics, carbon black		<b>Banned X</b>
Plastics labelled "compostable" or "biodegradable"		<b>Banned X</b>
<b>FOOD SERVICE WARE: NOT FOR IMMEDIATE CONSUMPTION</b>   Includes bowls, boxes, cartons, cups, plates, platters, trays, hinged containers, lidded containers, egg cartons and film wrap – used to hold food and drinks not intended for immediate consumption.		<b>REGULATION</b>
#3 plastics PVC, PVDC, oxo-degradable plastics, or "biodegradable"		<b>Banned X</b>
<b>OXO-DEGRADABLE PACKAGING AND PRODUCTS</b>   Contain an additive that breaks down through oxidation and fragments into tiny pieces (microplastics).		<b>REGULATION</b>
Dog waste bags, drycleaning over-bags, tea sachets and garbage bags		<b>Banned X</b>
<b>RING CARRIERS</b>		<b>REGULATION</b>
Plastic ring carriers (including plastic labelled "compostable" or "biodegradable")		<b>Banned X</b>
<b>POLYVINYL CHLORIDE (PVC) FILM WRAP</b>		<b>REGULATION</b>
Polyvinyl chloride film wrap (cling wrap)		<b>Banned X</b> (Effective July 1, 2028)
<b>FOAM MEAT TRAYS</b>		<b>REGULATION</b>
Foam meat trays (including plastic labelled "compostable" or "biodegradable")		<b>Banned X</b> (Effective July 1, 2030)

## Approaches by Other Jurisdictions

### *British Columbia*

- **Government of BC – Grant Funding** – CleanBC Plastics Action Fund provides funding to local businesses, foundations and First Nations to develop creative and effective ways to repair, reuse and recycle plastics into new products to reduce waste. This includes initiatives that support the use of reusable food service ware.
- **City of Vancouver – Take-out Cup/Container Program/Pilot** – the 'Return-It to Reuse It and Recycle It' 2022-2024 pilot included public space bins and partner locations for collecting reusable and single-use cups across Vancouver. This was a partnership between Return-It, Tim Hortons, Starbucks, A&W Canada, McDonald's Canada, City of Vancouver, Metro Vancouver and Merlin Plastics.
- **Metro Vancouver – Take-out Cup/Container Program/Pilot** – In 2024, Metro Vancouver contracted Ocean Ambassadors to promote reuse and reduction of single-use items. This included Ocean Ambassadors working with the New Westminster Hyack Festival and Vancouver Folk Festival to reduce their plastic waste through the use of reusable food service ware. A best practice guide for events is in development.
- **City of Victoria – Reusable Container Policy (for customer containers)** – Effective March 5, 2026, businesses will be required to use only reusable products for dine-in services.
- **Capital Regional District – Grant Funding** – The Zero Waste Event Grant offers up to \$10,000 of funding to organizations planning and hosting events, particularly through the use of reusable products and zero-waste practices. The Community Grant provides up to \$5,000 towards funding projects to help reduce the region's waste, such as purchasing a dishwasher to eliminate use of single use plates/cutlery.
- **Fraser Valley Regional District – Grant Funding** – the Waste Reduction Initiative Fund is a two-year pilot program to assist non-profit organizations with waste reduction projects. \$20,000 is available each year, with up to \$5,000 per project. Example projects include the use of reusable containers at events.

## ***Municipalities across Canada***

- **Town of Banff**

- **Reusable Dishware (dine-in requirements)** – Effective January 1, 2024:
  - Businesses such as restaurants, cafes and bars must provide reusable food ware, such as plates, bowls, cups, cutlery and other accessory items, for any food or beverages consumed on the premises.
  - Businesses must also have reusable options at self-serve stations for customers (in addition to any disposable single-use items).
- **Dishwashing Facilities and Minimum Seating Requirements** – Effective January 1, 2024: Businesses serving food and beverages ready for consumption must have suitable dishwashing facilities to clean the reusable food ware, and provide adequate seating (minimum of 10 seats) for consumption on the premises.
- **Reusable Container Policy (for customer containers)** – Effective July 1, 2023: Businesses and event organizers serving food or beverages must have a written policy to accept reusable cups and containers that customers bring to the business or event.
- **Take-out Cup/Container Program/Pilot** – Banff Borrow Reusable Cup Program allows customers to borrow a cup along with a drink purchase, and then return at a participating location. Businesses participate with the City paying business subscription fees until the end of the pilot phase in December 2024. The City put out an RFP and contracted Muuse for the program.

- **Ville de Terrebonne** – Effective January 1, 2024:

- **Reusable Dishware (dine-in requirements)** – Businesses must use reusable dishes in dining rooms. All disposable tableware in the dining room is prohibited (glasses, cups, mugs, lids, bowls, plates, utensils, trays, or other containers and their lids). Subject merchants must therefore provide and use reusable tableware when consuming food in the dining room with or without table service and on terraces with table service.
- **Reusable Container Policy (for customer containers)** – Businesses must accept consumer containers. This includes packaging leftovers at restaurants and for products sold in bulk and/or at a counter.
- **Grant Funding** – Maximum grant amount per business unit are based on type of eligible product. Eligible products include: dishwasher, reusable tableware, bulk station, cash register or system, water fountain, washer station, waste sorting islands, and waste reduction hiring. A maximum of \$15,000 per business unit may be granted during the grant period.

- **City of Edmonton** – Effective July 1, 2023:

- **Reusable Dishware (dine-in requirements)** – Restaurants are expected to serve dine-in drink orders in reusable cups. Reusable cups are made from durable materials

like metal, ceramic or hard plastic, and can withstand repeated washing, sanitizing and use.

- **Reusable Container Policy (for customer containers)** – Restaurants are expected to have a written policy for accepting reusable customer cups. Drive-thrus are encouraged, but not required, to accept reusable cups.
- **Event Policy (for customer containers)** – Events expecting more than 1,500 attendees are required to comply with parts of the single-use bylaw as well, including the organization must have a written policy for accepting customers' reusable cups.
- **City of Ottawa – Take-out Cup/Container Program/Pilot** – A reusable food container pilot launched in Ottawa in mid 2024, with participation by grocers and restaurants. The pilot is a collaborative effort between Circular Innovation Council, an environmental not-for-profit organization, and major Canadian grocery retailers – Metro, Sobeys, Farm Boy, and Walmart Canada – with the support of Environment and Climate Change Canada and the City of Ottawa.
- **City of Guelph – Reusable Container Policy (for customer containers)** – Effective September 1, 2025, businesses in Guelph must accept customers' reusable containers for food orders, whether the food is eaten on-site or taken away. Alternatively, businesses can provide their own reusable containers instead.
- **City of Toronto – Reusable Cup Policy (for customer cups)** – Effective March 1, 2024: Businesses must accept the use of reusable beverage cups by customers. Effective September 2, 2024: Require retail business establishments to post signage that they accept reusable beverage cups. Fall 2025: City of Toronto will conduct consultation on reusable dishes for dine-in, accepting customer reusable food containers and reusables at large venues.