

Tracey Spack  
Director  
Plastics Regulatory Affairs Division  
Environment and Climate Change Canada  
351 St. Joseph Blvd.  
Gatineau, QC  
K1A 0H3

Dear Ms. Spack

**RE: The federal government's Single-use Plastics Prohibition Regulations: SOR/2022-138**

The City of Guelph recently enacted a Single-Use Items ("SUI") Reduction Strategy and Single-Use Items ("SUI") By-law, which came into effect on January 1, 2023. During the development of the SUI Reduction Strategy and SUI By-law in early 2022, the City met with the City's Accessibility Advisory Committee ("AAC"), who provided feedback on the impacts of banning single-use plastic ("SUP") straws on people with disabilities.

Prior to the finalization of the City's SUI By-law, the federal government released the Single-use Plastics Prohibition Regulations ("Regulations") which prohibits restaurants from providing a SUP straw to a customer.

The City has continued to engage with the AAC as it relates to the SUI Reduction Strategy, and the AAC recommended that the City provide a letter to the federal government that urges reconsideration for SUP straws to be exempt from restaurants so they can still be available for and provided to customers. There are members in our community who rely on SUP straws to be able to consume food, partake in recreation and social activities, and for hydration. By not having SUP straws readily available, it does create barriers for those who have a disability to participate in everyday activities that others can freely enjoy.

The following feedback was provided by the Chair of the AAC on behalf of the collective AAC and is included in this letter as it speaks to their lived experiences and impacts of the SUP straw ban on people with disabilities.

**City Hall**  
1 Carden St  
Guelph, ON  
Canada  
N1H 3A1

T 519-822-1260  
TTY 519-826-9771

[guelph.ca](http://guelph.ca)

"The AAC supports the federal government's decision to ban some single-use plastics, however, there are some details that the AAC feel still need to be considered. Accessibility often means understanding universal design and applying those principles to be used by all people, to the greatest extent possible without the need for adaptation. It's in these details that we understand the impacts on people with experiences different than our own.

The AAC encourages the federal government to make bendable plastic single-use straws available upon request at restaurants. Plastic is the only material currently available that serves the needs of the disabled community without creating more barriers, (e.g., people have difficulty holding a cup because of motor function disabilities, grip strength or they have muscle spasms).

Alternative straws, including made from paper, metal, or glass, are not feasible options for people living with a disability, for the following reasons:

paper straws disintegrate after soaking in liquids for a period of time, making them a choking hazard,  
metal and glass straws don't protect against heat, further, glass and metal straws can be a safety hazard for people with muscle spasms,  
it can also be difficult for people to clean their straws at home if they have mobility issues,  
in addition, the metal in metal straws can cause allergic reactions for people with chemical sensitivities, and  
if you have a straight straw, you have to bend your neck over your drink to drink it. Even the plastic straws that don't have a bend in them can still physically bend and they can snap back to normal.

There are also financial implications resulting in larger social impacts, including:

Some people with a disability are impacted financially with extra charges related to their disability. The extra charges can impact the person's available funds. If a person is required to add the purchase of an eating utensil (straws) that serve a purpose related to their disability, that others are not required to buy, they now have added cost and labour to source, buy and carry

specialty straws with them. This leads to a larger social discussion.

The legislation includes a ban on plastic eating utensils as well, however, the implementation of this ban still allows for utensils that are complying with the ban to be provided by the restaurant, unlike plastic bendable straws.”

Additionally, the AAC recommended that the City explore the development of a program that offers free or subsidized SUP flexible straws to those who need them in order to offset the costs for people with disabilities who will need to purchase these SUP straws. The City confirmed with the federal government, that the Regulations do not allow a municipal government to sell (including to provide for free or subsidized) SUP flexible straws to its residents.

As a possible solution, the federal government could subsidize the cost of SUP straws for people with disabilities or allow municipal governments to explore the development a program that reduces the financial impacts of SUP straws for people with disabilities.

Thank you for the opportunity to provide this feedback. The City and the AAC encourage the federal government to consider this feedback prior to the ban on the sale of SUP straws coming into effect on December 20, 2023.

Sincerely,

Jayne Holmes, P.Eng., PMP  
Deputy Chief Administrative Officer  
Infrastructure, Development and Enterprise Services  
Location: 1 Carden Street, Guelph, ON N1H 3A1

T 519-822-1260 extension 2248  
TTY 519-826-9771  
E jayne.holmes@guelph.ca  
guelph.ca