



Town of Banff



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Single-Use Items Bylaw Case Study

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1 Background

The Town of Banff developed a Single-Use Item (SUI) Reduction Strategy that combines voluntary and regulatory measures that help reduce single-use items. The Town strives to be a model environmental community, adopting and implementing innovative programs to protect and enhance the natural environment.

The Town of Banff passed a Single-Use Items Reduction Bylaw to support a range of voluntary initiatives already underway to help reduce disposable items that are used only once and immediately thrown away. The [Single-Use Item Reduction Bylaw](#) was introduced, and enforced, in stages:

Effective July 1, 2023

- Customers must request accessory disposable items (e.g., forks, napkins, etc.)
- Customers must be allowed to ask for food and beverages to be served in their reusable containers

Effective January 1, 2024

- Plastic shopping bags are banned and minimum fees required on paper (\$0.25) and reusable bags (\$2)
- **Businesses are required to provide reusable foodware for dine-in services**

This case study focuses on the requirement for all businesses, including quick-service restaurants (QSRs), to provide reusable foodware containers for dine-in services. This study was completed to develop a better understanding of the impacts of the bylaw, including challenges, opportunities, and lessons learned.

This case study specifically examines Banff's SUI Bylaw in three quick-service restaurants, including the local Starbucks (201 Banff Ave), Tim Hortons (100 Gopher Street) and Hankki, a local Korean restaurant (206 Buffalo Street). Interviews with each of the three restaurants were completed in June and July 2025. Interview summaries are provided in Appendix A. Site visits were also completed and photos from these visits can be found in Appendix B.

This document provides a public-facing resource that can be shared with other Canadian communities as an example of regulatory action on SUIs.

2 Dine-in Reusables

According to the Town of Banff's Single-Use Items Reduction Bylaw, all businesses are required to:

- Provide reusable food ware, such as plates, bowls, cups, cutlery and other accessory items, for any food or beverages consumed on the premises.
- Ask, and rely on, the customer's stated intention as to whether they are staying or going.
- Have suitable dishwashing facilities to clean the reusable food ware and provide adequate seating (minimum of 10 seats) for consumption on the premises.
 - Existing businesses can apply for an exemption if they cannot accommodate on-site or off-site dishwashing facilities due to space, financial or other special circumstances.
 - All new food and beverage businesses must provide a minimum of 10 seats, on-site dishwashing facilities and reusable food ware to enable dine-in services. This clause attempts to avoid new business models operating in Banff that are solely dependent on single-use / take away packaging.



It is noteworthy that non-profits, charitable organisations and healthcare facilities are exempt from the requirements.

Using the three identified QSRs in this case study, there is a noticeable difference between the dine-in service ware provided. For example, Tim Horton's exclusively uses ceramic dishware except for a reusable plastic cup for cold beverages such as iced cappuccinos. Hankki uses ceramic-style bowls and plates as well as metal buckets (with disposable paper liner) for items such as fries. Starbucks has the option of ceramic mugs for hot drinks, glassware for cold drinks, and ceramic plates and metal cutlery for food. Photos of these options in each of the QSRs are featured in the following figures.



Figure 1: Hankki reusable ceramic and tin foodware for dine-in



Figure 2: Tim Horton's dine-in reusables



Figure 3: Starbucks dine-in reusable cups, plates and glasses

3 Education and Training

To ease the transition to reusables, as well as promote overall waste diversion, The Town of Banff provides [downloadable signage templates](#) for businesses to utilize. Although QSRs can choose to use their own corporately branded signage, restaurants such as Hankki were found to use Town signage on most of their publicly accessed bins.

All QSRs included in the case study identified training of staff to be a critical element to a successful reusable program roll-out. However, the restaurants also acknowledged the challenges associated with staff training and consistency of program delivery, especially during busy service times. Each restaurant requires staff to ask customers if they are "dining-in" or taking their order "to-go", including a prompt at point-of-sale that must be followed. Some restaurants have corporate training manuals, or set of instructions, for staff to use. Restaurants often experienced challenges maintaining a quick service while ensuring each customer is asked about their dining location choice.

Tim Horton's and Starbucks have recently begun to transition towards more of a dine-in "coffee house" style of restaurant in many locations. Their service model is focusing on a more appealing place for customers to dine in and use the space. For example, Starbucks is adding more seating areas and outlets in their restaurants that had furniture removed during COVID-19 to encourage customers to dine in. Tim Horton's is making similar changes, focusing on high quality dine-in service ware that facilitates ease of use and provides a more user-friendly experience with creative design considerations such as fill lines and pinch handles.

4 Systems in Place

Through the compilation of this case study, it became obvious that the level of effort and time required for businesses to adopt reusables for dine-in service depended on the current systems in place. For example, Starbucks could more easily revert back to using their reusable inventory, whereas Hankki had no existing reusable inventory. Tim Hortons was able to revert back to using their existing reusable inventory (still in store), which allowed for partial compliance with the bylaw. However, several of Tim Hortons menu items are not compatible with existing inventory, leading to procurement of additional styles of dishware to complement what was already in place. Due to their lack of reusable inventory, Hankki also had to install a dishwasher, whereas Starbucks and Tim Horton's already had dishwashers in place.

To incorporate reusables into the regular flow of business at each of the QSRs, there were a few common practices including:

- Training for staff to identify and properly serve dine-in customers
- Dirty dishes station
- Adequate dishwashing infrastructure and space (i.e., dishwashers and sinks)
- Storage infrastructure for reusables being incorporated into the store design (e.g., drawers with built in racks for efficient storage of mugs)
- Signage regarding reusable containers
- "Dine-in" prompt at point of sale for digital orders

5 Customer Satisfaction Surveys

In-person surveys were completed by Town of Banff staff at two of the case study QSRs: Hankki and Tim Horton's. Town staff were seated in an area of the restaurant that allowed them to speak with dine-in customers but also didn't interfere with restaurant operations. Survey questions included:



1. Do you prefer eating from a reusable container rather than a disposable one?
Yes/No/No preference
2. Are you supportive of this restaurant using reusable containers?
Yes/No/No opinion
3. Were there any challenges for you in using the reusable containers?
Yes/No (if yes, please specify)

Of the 23 survey responses, 16 customers (70%) indicated they prefer dining with reusable containers. 100% of customers surveyed supported the restaurants using reusable containers and none of the survey respondents experienced issues with the reusable containers during their visit.

Although based on a relatively low survey rate, these results indicate a preference (70%) for reusable containers when dining in and show overall support for the use of reusable containers at restaurants in the Town of Banff.

6 Financial Impacts

Restaurants included in this case study all identified reusables as providing long-term cost savings. While initial investment costs were universal, the long-term financial picture appeared positive. Establishments reported significant reductions in waste disposal costs and single-use purchasing expenses. However, no quantitative data was obtained from the participating QSRs regarding overall cost savings.

Hankki noted dramatic improvements in waste volume despite increased sales, with no garbage overflow issues compared to previous years when disposable bowls constituted their largest waste stream. Hankki also noted that savings from reduced single-use purchases and waste disposal costs are expected to cover the additional cleaning staff salary.

7 Waste Reduction (Actual and Perceived)

While Hankki doesn't have concrete data on single-use reduction, the restaurant reports dramatic anecdotal improvements. Garbage volume decreased significantly despite higher sales, with no dumpster overflow warnings in 2025.

Despite Hankki restaurant experiencing a 20% increase in sales during 2025, waste from disposable bowls has remained stable, demonstrating a minor improvement in operational efficiency. In 2024, the restaurant used 208 boxes of disposable bowls, with each box containing 600 bowls, totaling 124,800 bowls for the year. Through the first half of 2025, Hankki has used 102 boxes (61,200 bowls), which projects to approximately 204 boxes for the full year – essentially matching the previous year's consumption despite a significant increase in sales. This means that while revenue has grown by 20%, the restaurant is serving more customers without generating additional bowl waste, indicating either better portion control, increased dine-in service, or more efficient inventory management practices that reduce unnecessary waste.

In the coming year, the Town of Banff will be conducting waste audits for both commercial streams (dine-in) and public realm streams to measure SUIs against baseline numbers.

8 Benefits

8.1 Enhanced Customer Experience

Despite initial concerns about operational complexity, all three establishments reported positive customer reception. Starbucks customers appreciated the improved coffee house atmosphere created by ceramic mugs, while Tim Horton's noted that their higher-quality reusable foodware enhanced food presentation and created "branded moments of joy." Hankki observed that properly trained staff felt more positive about their work, particularly in relation to waste reduction initiatives.

8.2 Corporate Interest and Scalability

The Banff implementation generated broader corporate interest beyond the immediate regulatory requirement. Starbucks corporate began tracking "for here ware" usage across all locations, not just Banff, indicating integration into broader business strategy. Tim Horton's viewed the sustainability initiatives as risk management and business development opportunities. Hankki's parent company expressed interest in implementing similar programs across their other Alberta locations.

9 Implementation Challenges

9.1 Operational Complexity

All three establishments identified similar core challenges in implementation. The primary operational hurdle involved retraining staff to consistently ask customers about their dining intentions – a seemingly simple task that proved difficult to maintain during busy periods. Staff struggled to balance speed-of-service expectations with the additional steps required for reusable service, including proper customer identification, serving in appropriate containers, and collection and washing of reusable containers (busing tables).

Starbucks did also acknowledge a challenge associated with customers changing their minds or indicating the incorrect action of eating "in" or "to-go". Additionally, having adequate "for here ware" stock was a challenge at first.

In the context of Tim Hortons specifically, an additional barrier was adding a prompt to in-store kiosks/online ordering apps that asks customers about their dining intentions. This operational change must be instigated by national head office for any location that wishes to make the change, and the process has yet to be implemented.

9.2 Infrastructure Requirements

Infrastructure needs varied significantly based on existing capabilities. Starbucks required minimal changes, as they already maintained dishwashers and reusable inventory as standard equipment. The main adjustment involved increasing inventory levels to accommodate higher dine-in volumes.

Tim Horton's implemented more substantial changes, including the development of new foodware designs with specific features like raised-edge plates and size indicators on cups, and creating specialized storage solutions for easier cup management. However, these designs are a part of Tim Horton's overall sustainability initiatives and are planned to also be implemented in restaurants beyond Banff.

Hankki underwent the most dramatic transformation, expanding their physical space to provide additional service options and accommodate dishwashing facilities, sourcing specialized containers from Korea, and hiring an additional staff member specifically for cleaning operations.



9.3 Staff Training and Turnover

High employee turnover emerged as a consistent challenge across all establishments, likely due to the transient tendency in Banff. This created ongoing training demands and compliance difficulties, particularly during peak service periods when speed pressures led staff to default to familiar takeaway procedures.

10 Strategic Alignment vs Regulatory Compliance

The three establishments demonstrated varying degrees of alignment between the bylaw requirements and their existing business strategies. Starbucks is currently pivoting toward a "community coffee house" model that emphasizes in-store dining with porcelain cups. For Starbucks, the bylaw represented a "happy coincidence" rather than a regulatory burden, supporting their corporate strategy of encouraging customers to stay longer in-store. However, issues with compliance have been reported, likely due to the regulatory requirement in Banff being ahead of the corporate "coffee house" transition.

Tim Horton's is approaching the requirement as part of a broader sustainability framework, with corporate targets including a 10% reduction in virgin plastic use and aspirations to reduce single-use cup waste across Canada. This target was published in Tim Horton's 2023 "Restaurant Brands for Good" report and has a target completion date of the end of 2026. The company viewed reusables as integral to expanding their lunch and dinner service offerings and enhancing the overall customer experience. Similarly to Starbucks, non-compliance has been an issue at times and this can likely be explained by Banff's regulation being in place before the corporate expansion of in-house lunch and dinner service.

Hankki, as a smaller local operation, faced the most significant operational transformation, transitioning from a completely disposable model to reusables across their entire service line. However, the restaurant embraced the change as an opportunity to reduce environmental impact and achieve long-term cost savings.

11 Lessons Learned

11.1 Policy Design Considerations

This case study reveals that successful implementation requires recognition of the ongoing operational complexity involved in behaviour change. While the infrastructure requirements proved manageable for most establishments, the human element, consistent staff behaviour modification, remained the most persistent challenge.

QSRs acknowledged that reusables are not a "net-new" concept and need to be re-introduced to staff and customers to be normalized.

11.2 Business Model Compatibility

Establishments with existing infrastructure and business models that aligned with dine-in service experienced smoother transitions. The policy worked most effectively when it supported rather than contradicted existing corporate strategies and customer expectations. This is consistent with business models transitioning to dine-in culture.

11.3 Long-term Adaptation

Despite initial implementation challenges, all three establishments indicated that reusable requirements had become integrated into their operational thinking and future planning. The policy appeared to catalyze broader sustainability considerations beyond mere compliance. This is in addition to the reality that the bylaw has driven integration of reusables into food service operations in Banff.

11.4 Conclusion

The Banff reusable foodware bylaw demonstrates that municipal waste reduction policies can be successfully implemented across diverse food service establishments, though the experience varies significantly based on existing business models and infrastructure. While operational challenges around staff training and service speed persist, the positive customer reception, cost benefits, and corporate strategic alignment suggest that such policies can achieve both environmental and business objectives when properly implemented.

The case study indicates that successful policy implementation requires ongoing support for behaviour change management rather than simply mandating infrastructure modifications. The most successful adaptations occurred when businesses could integrate reusable requirements into broader strategic objectives, suggesting that policy design should consider alignment with existing industry trends and business incentives.

It is clear that Banff's reusable foodware bylaw prompted an increase in use of reusables in QSRs in advance of Canada-wide corporate sustainability initiatives, and in some cases initiated a focus on reusables in restaurants that had operations primarily focused on utilising single-use foodware.



Appendix A: Interview Summaries

Starbucks – June 26th, 2025 with Ross Anderson (Head of Social Impact, Public Policy & Sustainability at Starbucks Canada)

Corporate Strategy Alignment Starbucks was already transitioning toward a "community coffee house" model before Banff's bylaw took effect. The company identified that their focus on efficiency had led to shortened point-of-sale scripts, causing staff to default customers to takeaway rather than asking about dine-in preferences. Corporate has renewed emphasis on in-store dining with porcelain cups to enhance the coffee house experience, making the Banff bylaw a "happy coincidence" rather than the primary driver of change.

The company is actively building stores with more seating, restoring seating removed during COVID, and adding amenities like accessible power outlets and improved furniture to encourage customers to stay longer in-store.

Operational Infrastructure Unlike other restaurants interviewed, Starbucks required minimal infrastructure changes since they already had dishwashers and reusable inventory ("for here ware") as standard equipment. The main adjustment involved increasing inventory levels to accommodate higher volumes of dine-in customers.

Implementation Challenges The primary challenge occurs during peak times when staff prioritize speed over proper customer identification. Despite corporate training and initial emphasis on asking about dine-in intentions, compliance has plateaued. Staff struggle to balance quick service expectations with the additional steps required for reusables, including asking customer intentions, serving in reusable cups, and bussing tables.

Additional challenges include customers changing their minds about staying versus leaving, inventory management issues where individual stores don't order adequate "for here ware" stock, and high staff turnover (estimated to be approximately 25% every six months in Banff).

Corporate Response and Metrics Starbucks corporate is aware of these compliance lapses and is exploring solutions including point-of-sale prompts for staff. Notably, they're tracking "for here ware" usage as a metric across all stores, not just Banff, indicating this is part of broader corporate strategy rather than bylaw-specific compliance.

Licensing Complexity The interview highlighted that many Starbucks locations are licensed rather than corporate-owned (such as those in universities, hospitals, or airports), limiting corporate's ability to implement changes. However, corporate expressed interest in learning from Banff's experience, particularly a closed-circuit reusable program being developed with the Gondola Starbucks location.

Staff and Customer Reception While store managers feel tension between speed-of-service goals and reusable requirements, often baristas generally appreciate the sustainability aspects. Customers report better experiences with ceramic mugs, supporting the coffee house atmosphere corporate seeks to create.

The interview suggests Starbucks views reusables as integral to their evolving business model rather than mere regulatory compliance, though operational execution during busy periods remains challenging.

Tim Hortons – July 10th, 2025 with Carl Botha (Sr. Manager, Sustainability & Packaging for Tim Horton's)

Corporate Sustainability Framework Their key targets include reducing virgin plastic use by 10%, aspiring to reduce single-use cup waste in Canada over the next decade, and making all packaging recyclable or compostable. The company is expanding their "bring your own" program and focusing on three strategic areas: bring-your-own containers, dine-in service, and a borrow program.

Operational Changes in Response to Bylaws To comply with reusable requirements, facilitate ease of use for staff, and develop more of a dine-in culture, Tim Hortons has developed new foodware designs including plates with raised edges, soup bowls with in-mold fill lines, and reusable plastic cups with size indicators. These new designs are part of Tim Horton's country-wide initiative to help reach their overall sustainability targets. Restaurant modifications include installing under-counter dishwashers (though many locations already had these pre-COVID), implementing hand-washing protocols where sufficient, and adding specialized storage drawers with pegs for easier cup storage.

Implementation Challenges and Benefits The biggest challenge has been reintroducing dine-in service post-COVID, as it's now viewed as a "net-new" program rather than a standard expectation. Staff training and managing operational complexity while maintaining speed of service remain ongoing concerns.

However, the company sees significant benefits beyond compliance. Reusables provide long-term cost savings, higher-quality foodware that enhances customer experience, and what they call "branded moments of joy." The ceramic dishware delivers better food presentation, and properly trained staff report feeling more positive about their work, particularly with waste reduction initiatives like their "Too Good to Go" program.

Strategic Alignment Importantly, Carl noted that Tim Hortons would be pursuing these sustainability initiatives across Canada regardless of bylaws, as they align with business objectives like expanding lunch and dinner service, which naturally supports more dine-in occasions. The company views this sustainability work as risk management for the business, with the bylaws providing convenient alignment with existing corporate goals.

The interview suggests Tim Hortons sees reusables not just as regulatory compliance but as part of a broader strategy to enhance customer experience while meeting environmental objectives.

Hankki – July 17th, 2025 with Hyekyoung Seo (Local QSR Owner)

Their Banff location is the first experience with reusable foodware across their 10 Alberta locations.

Operational Transformation Hankki underwent a complete transition from disposables to reusables, changing every item including rice bowls, fry buckets, utensils, and cups for desserts and drinks. The restaurant sourced specialized bowls and cups from Korea due to limited sizes and materials in Canada, while sourcing buckets domestically from Ikea. They prioritized durability over aesthetics, avoiding glass products, and easily accommodated bring-your-own containers since their food is pre-portioned.

Infrastructure and Staffing Changes The restaurant expanded their square footage to offer additional services and incorporate a dishwasher as well as dedicated stations for dirty dishes. The most significant operational change involved retraining staff to ask customers about dine-in versus takeout preferences—a challenging adjustment requiring constant reminders, particularly during busy periods. High staff turnover compounded training difficulties, and the restaurant needed to hire an additional person specifically for cleaning reusables.

Waste Reduction and Cost Impact While Hankki doesn't have concrete data on single-use reduction, they report dramatic anecdotal improvements. Garbage volume decreased significantly despite higher sales, with no dumpster overflow warnings this year compared to previous years when bowls constituted



their largest waste stream. Although the lack of dumpster warnings may not directly be because of fewer bowls being disposed, the restaurant found it easier to manage their overall disposal practices. The financial impact shows initial investment costs for reusables, but long-term savings from reduced single-use purchases and waste disposal costs are expected to cover the additional cleaning staff salary.

Implementation Challenges The restaurant faced several behavioral challenges: customers occasionally discarded reusable dishes, preferred disposable drinks for portability, and struggled with waste sorting. Tourist education proved particularly difficult compared to local residents who were more environmentally conscious. Health Canada's preference for machine dishwashing over handwashing of dishes also created operational constraints.

Corporate Interest and Future Plans The Banff location's experience has sparked corporate interest in implementing reusables at other locations. Hankki is considering offering discounts for customers who bring their own containers, suggesting the bylaw has catalyzed broader sustainability thinking beyond mere compliance.

The interview reveals how a takeout-focused restaurant successfully transitioned to reusables, viewing initial challenges as part of a longer-term shift toward reduced environmental impact and operational cost savings.

Appendix B: Site Photos

Hankki:





Tim Hortons:



