



November 30, 2016

The Honorable Matt O'Malley
1 City Hall Square
Room 550
Boston MA 02201

Dear Councillor O'Malley,

My name is Mark Daniels, and I'm the Chairman of the American Progressive Bag Alliance (APBA), an organization that represents our country's plastic retail bag manufacturers and recyclers and the 400 Massachusetts residents whose jobs are supported by the industry. I previously lived for many years in Massachusetts and care about working with you to preserve its pristine environment.

As the Council considers a possible plastic retail bag ordinance, I'd like to offer myself and representatives of the APBA as resources to you and your fellow councilors. I encourage you to take comprehensive look at the issue and would like to share some facts that should be helpful in your upcoming discussions.

Environmental Facts

- According to the EPA, plastic retail bags make up less than 0.3 percent of the nation's municipal solid waste.¹ According to a 2014 Rhode Island litter study, plastic bags represent just 1.2 percent of litter in the Northeast.² As for offshore litter, the 2015 Ocean Conservancy Report revealed that plastic retail bags account for just 1.2 percent of Massachusetts' coastal litter.³
- Plastic retail bags comprise such a small percentage of overall waste that meaningful waste reduction is never achieved through bans or taxes. Further, plastic retail bag bans push people toward replacement bags—often made of thicker, heavier plastic or non-recyclable material—that contribute more to waste than standard-issue plastic retail bags.⁴ In Austin, TX, a study commissioned by the city found that its March 2013 ban drove an increase in thicker reusable bag waste nearly equal to the amount of diverted plastic retail bag waste.⁵ Research shows a cotton bag must be used 131 times before it's a better environmental option than a plastic bag reused just three times.⁶
- Plastic retail bags are 100 percent recyclable, and more than 90 percent of the U.S. population has access to recycling through retail take-back programs which collectively recycled more than 1.17 billion pounds of bags, film and wraps in 2014.⁷ Forty-five such programs are located within 15 miles of Boston City Hall. Beyond recycling, surveys show as many as 90 percent of Americans reuse their plastic bags, supporting the "reduce, reuse, recycle" sustainability triangle.⁸
- In Massachusetts, a voluntary effort launched in 2009 to increase bag recycling and decrease the number of plastic and paper bags distributed reached its goal of a 33 percent reduction in 2010, three years ahead of schedule. This successful partnership between the Massachusetts Food Association and Department of Environmental Protection shows voluntary initiatives can succeed where government regulation has failed to produce results.⁹



Economic Facts

- In Massachusetts, 400 jobs are supported by the industry which stands to be negatively impacted by punitive product bans.
- A study of bag bans and budgets for litter collection and waste disposal in cities and counties across America revealed no evidence of a reduction in municipal costs attributable to the reduced use of plastic bags.¹⁰
- In Oak Bluffs—a Vineyard community dependent on its pristine beaches to draw in tourism—a proposal to ban bags recently was tabled after residents explained the real risks to the local economy that could stem from a ban.¹¹ Solutions rooted in education and recycling now are being considered.
- A study found that banning plastic bags negatively impacted retail sales and employment in the ban area, shifting business to stores just outside the bag ban region.¹²
- Following Seattle's ban on plastic bags, nearly 40 percent of surveyed store owners reported seeing their costs for carryout bags increase between 40 percent and 200 percent.¹³
- In Los Angeles County, stores inside the ban area were forced to terminate staff, sometimes by as much as 10 percent. In contrast, stores outside the ban area reported increased employment by 2.4 percent.¹⁴
- Importantly, we know that when there are regulations like this, the people who are most negatively impacted are our most vulnerable citizens, including seniors and low-income families. Fees on alternative bags - the ordinance says retailers must charge no less than \$0.05 per bag, meaning they could charge more - add up and are particularly painful to people who already struggle with grocery costs.

Based on experiences we've seen in Massachusetts and around the country, we feel strongly that promoting recycling and recycling education in Boston is a positive course of action that would benefit your communities. Since 2005, the rate of plastic bag, film and wrap recycling has grown nearly 80 percent. All the while, very high plastic retail bag reuse rates persist—both of which can be leveraged to support Boston's larger sustainability goals.

Please do let me know if you have any questions. I and other members of the APBA would be happy to meet to discuss the issue further and work together toward a meaningful outcome.

Regards,

Mark Daniels
Chair of the American Progressive Bag Alliance

¹ [Advancing Sustainable Materials Management: Facts and Figures 2013](#), Environmental Protection Agency, June 2015.

² 2014 Rhode Island Litter Survey, Environmental Resources Planning, LLC, April 4, 2014.

³ [Trash Free Seas: Every Piece Every Person, 2014 Report](#), International Coastal Cleanup and the Ocean Conservancy, 2015.



- ⁴ Proposed Plastic Bag Levy - Extended Impact Assessment, Scottish Government, 2006; and Bin line sales double nation average after plastic bag ban, *The Advertiser*, 2011.
- ⁵ Minter, Adam, *How a Ban on Plastic Bags Can Go Wrong*, *Bloomberg View*, August 18, 2015.
- ⁶ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/291023/scho0711buan-e-e.pdf
- ⁷ 2014 National Post-consumer Plastic Bag & Film Recycling Report, American Chemistry Council, January 2016.
- ⁸ National Plastic Shopping Bag Recycling Signage Testing, APCO Insights, March 2007.
- ⁹ FFY10 Year-End Annual Report, Massachusetts Department of Environmental Protection, December 2010; and *Testimony - Bag Tax*, Massachusetts Food Association, April 2013.
- ¹⁰ A Survey on the Economic Effects of Los Angeles County's Plastic Bag Ban, National Center for Policy Analysis, August 2012.
- ¹¹ <https://vineyardgazette.com/news/2016/03/09/oak-bluffs-selectmen-pull-plastic-bag-ban-town-meeting-warrant>
- ¹² <http://www.ncpa.org/pdfs/sl340.pdf>
- ¹³ https://clerk.seattle.gov/~public/meetingrecords/2013/luc20130115_3c.pdf
- ¹⁴ <http://www.ncpa.org/pdfs/sl340.pdf>