

September 30, 2015

William A. White, Jr., President (At Large)
Board of Aldermen
93 Highland Avenue
Somerville, MA

Re: Proposed Plastic Bag Legislation

Dear President White,

My name is Lee Califf, and I serve as executive director of the American Progressive Bag Alliance (APBA). We represent plastic bag manufacturers and recyclers, an industry that employs more than 30,000 American workers—including 400 Massachusetts residentsⁱ—and provides a high quality, 100 percent recyclable product to consumers.

I am pleased that the Board of Aldermen has set aside time to hear public testimony on this proposed measure. Thank you. I appreciate this opportunity to set the record straight about the supposed benefits of plastic bag regulation and make clear the risk of unintended costs and consequences that so often accompany ban legislation.

Make no mistake: a plastic bag ban could negatively impact Somerville business owners and consumers, hamstringing the economy and jeopardize jobs, all without any clear positive impact on the environment.

Please consider the following points:

Plastic bag bans do not, in actuality, benefit the environment, as plastic bags are not a significant contributor to marine or land pollution and actually are less resource intensive than the alternatives.

- Regulating plastic bags would have little to no impact on litter and waste. The Environmental Protection Agency calculates that retail plastic bags, by weight, account for just 0.3 percent of the U.S. municipal solid waste stream.ⁱⁱ And in the Northeast region, plastic bags make up just 1.2% of litter, according to a 2014 Rhode Island litter study.ⁱⁱⁱ
- In terms of marine waste, plastic bags pose very little threat to healthy oceans when compared to other issues. Experts suggest that storm water runoff, fertilizer pollution and stray fishing gear are more significant threats to marine ecosystems.^{iv} David Santillo, a marine biologist with Greenpeace, has gone so far as to say, “We are not going to solve the problem of waste by focusing on plastic bags...it’s fishing gear that’s the big problem. On a global basis plastic bags aren’t an issue.”^v
- When it comes to shorelines, the impact of plastic bags is overstated. In a 2014 coastal cleanup report from the Ocean Conservancy, plastic grocery bags accounted for a fraction of 1% of all items collected on Massachusetts beaches.^{vi}
- So-called “reusable” bagging alternatives primarily are manufactured abroad and are often produced using nonwoven polypropylene (NWPP)—a material that is not recyclable. NWPP bags, in particular, are made from crude oil, and 95.5% of them end up in landfills.^{vii}

- Biodegradable or compostable bags sound good in theory, but are not a reliable alternative for consumers, either. Not only do compostable bags have a larger carbon footprint, but they also must be sent to one of the country's few industrial composting facilities—otherwise they sit in landfills unable either to decompose or be recycled.^{viii}
- In contrast, plastic retail bags are 100% recyclable, produced in the United States and contain meaningful levels of recycled content (via true closed-loop recycling). Further, nine out of ten Americans report reusing their plastic retail bags for various purposes, including disposing of pet waste and packing snacks and lunches.^{ix}

Taking the extreme step of banning plastic retail bags could lead to real negative consequences for Somerville consumers and businesses. Plastic bag bans limit consumer choice, unfairly burden economically vulnerable residents, jeopardize high quality jobs and hurt the economy.

- Bans on plastic bags take a toll on local supermarkets, shoppers and businesses. Under the threat of fines or other penalties, they force business owners to comply with additional government regulations that mandate measuring, counting, reporting and maintaining records related to the enforcement of these unhelpful laws.
- The increased costs for storeowners to provide alternative bagging options or for shoppers to acquire them adds yet another burden to shoppers' monthly budgets—effectively making plastic bag bans a regressive tax on Somerville's hardworking families. For many Bay Staters—especially those who are on fixed- or low-to-middle incomes—every penny counts.
- Banning plastic retail bags in Somerville could hurt the local economy and impact jobs. One study found that a ban on plastic bags negatively impacted retail sales and employment in the bag ban area by shifting business to stores just outside the ban region. In Los Angeles County, stores surveyed within the ban area reported an overall average sales decline of nearly 6% and a 10% reduction in employment. Areas outside the ban reported an overall average sales growth of 9% and a 2.4% increase in employment.^x

The APBA supports Somerville's sustainability goals, but the fact is that plastic bag bans and taxes have a terrible record on advancing environmental ambitions. There is no evidence that this type of legislation could effectively alter consumer behavior, reduce the impact to the waste stream or meaningfully decrease the amount of litter. And while targeting such a small portion of waste and litter would have a negligible environmental impact at best, it could lead to real negative consequences for Somerville businesses and residents.

With this in mind, I urge you to carefully consider these facts and do what is best for Somerville's environment and economy.

Thank you for your time.

Lee Califf
Executive Director
American Progressive Bag Alliance

ⁱ "Table A-9: Unsupported Plastics Bag Manufacturing Selected Statistics in 2012, by State," Probe Economics, LLC, Size and Impact of the Plastics Industry on the U.S. Economy, 2013, 53.

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- ⁱⁱ "Municipal Solid Waste Report: 2013 Facts and Figures," United States Environmental Protection Agency, June 2015.
- ⁱⁱⁱ "2014 Rhode Island Litter Survey," Environmental Resources Planning, LLC, April 4, 2014.
- ^{iv} "Technical Proceedings of the Fifth International Marine Debris Conference," 2011.
- ^v Mostrous, Alexi, "Series of Blunders Turned the Plastic Bag into Global Villain," *The Times (London)*, March 8, 2008.
- ^{vi} "Turning the tide on trash" Ocean Conservancy, 2014.
- ^{vii} "Life Cycle Assessment of Reusable and Single-Use Plastic Bags in California," California State University & Chico Research Foundation, August 2010.
- ^{viii} "Compostable Biobags Have Higher Carbon Footprint, Report Says," *Environmental Leader*, February 19, 2011.
- ^{ix} "National Plastic Shopping Bag Recycling Signage Testing: A Survey of the General Population," APCO Insight, March 2007.
- ^x Villarreal, Pamela and Baruch Feigenbaum, "A Survey on the Economic Effects of Los Angeles County's Plastic Bag Ban," National Center for Policy Analysis, August 2012.