RESPONSE TO FIA LETTER OF MARCH 14, 2013

Once again, the representative of the Food Industry Alliance of NY State has tried to present misleading information to prevent the enactment of the plastic bag ordinance. It has forwarded three documents to the Mayor and the Board that are not based on valid factual evidence.

PLASTIC BAG RECYCLING

The study "2011 National Postconsumer Plastic Bag & Film Recycling Report" was prepared for the American Chemistry Council that owns the copyright on the document (page 13). It is presented to support the argument that recycling of plastic bags is working well so a ban is not necessary. Yet, a reading of the details in the study shows information to the contrary. It includes bags and sacks as part of the data reported for film. On page 3, it mentions that "clear commercial film continues to make up the majority of film collected for recycling." It continues on page 3 by stating "there is great uncertainty in the total recovery of bags and sacks." On page 7, it states, "Without consistent percentages reported by reclaimers there is great uncertainty in the total recovery of bags and sacks. The report methodology also includes many indirect calculations and assumptions and the accuracy of its data is questionable.

The other half of the recycling equation needed to calculate a recycling rate is the amount of plastic bags and sacks that are generated. Data reported by the U.S. EPA in its report "2010 MSW Tables and Figures", shows that 690,000 tons of high density polyethylene (HDPE) were used to generate of bags, sacks and wraps in 2010. HDPE is the grade of plastic used for these products. Of that amount, only 30,000 tons (4%) were recovered.

An article in "Plastic News" (February 6, 2012) compared the 2009-10 growth of plastic bag generation as 8 times the growth of the plastic bag recycling. The article also mentioned that California monitors recycling and reported in 2009 that only 3% of plastic bags generated are recycled. An attached chart from the U.S. EPA shows overall plastics generation and recovery from 1960 to 2010. The gap is growing at a high rate and also is applicable to plastic bags. If the recycling rate is constant and plastic bag generation is growing, then an increasing number of plastic bags will end up in the environment.

HEALTH ISSUES WITH REUSABLE BAGS

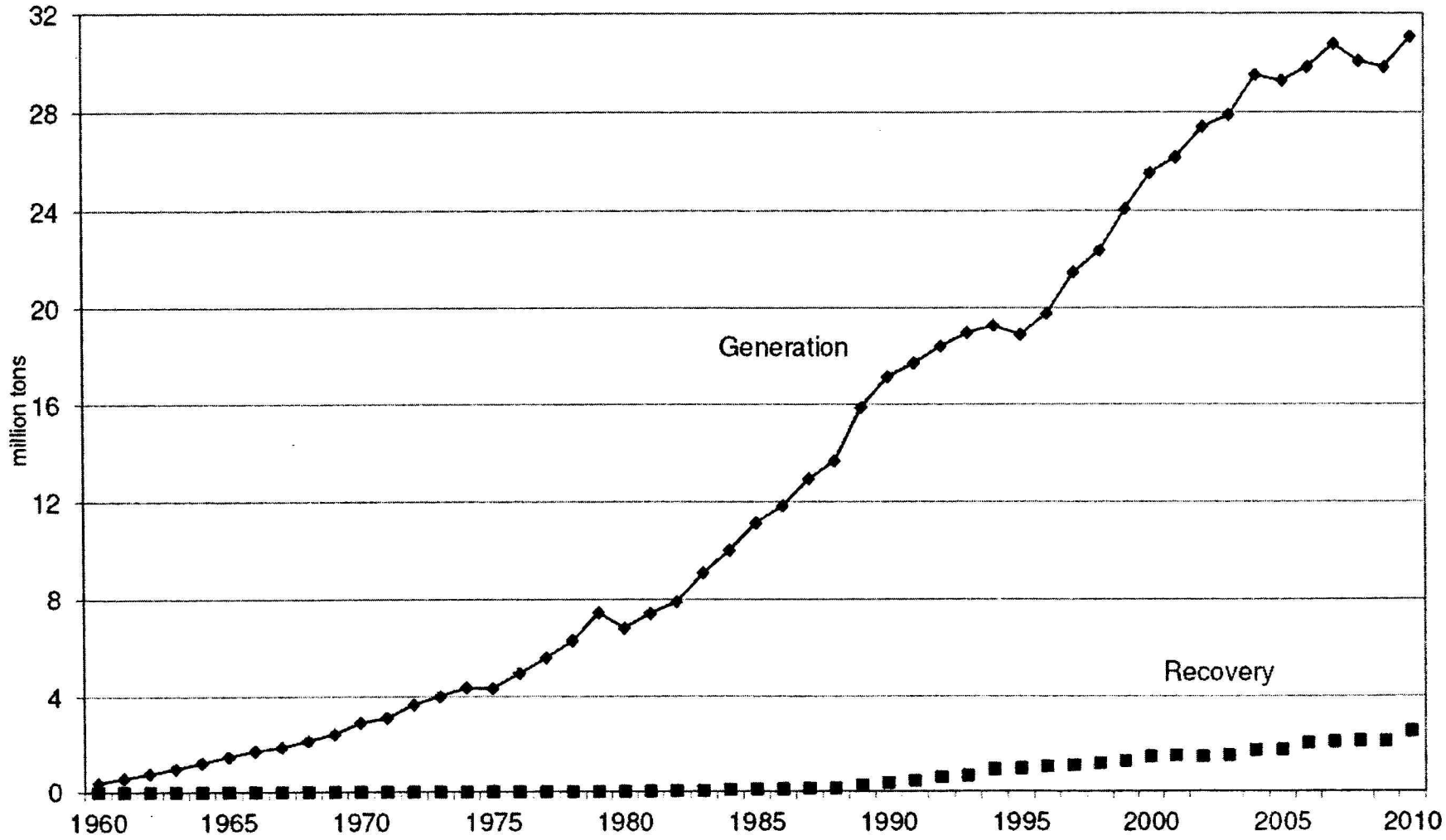
The article on the illnesses of 9 members of a soccer team in Oregon is meant as a scare tactic not to use reusable bags. This small reported incident should be taken in the context of hundreds of thousands of cases annually of food poisoning and other virus contaminations. The article said only that the illness was associated with touching a reusable grocery bag **OR** consuming its food contents. Cookies, chips and grapes were passed around as part of the lunch. While the cookies and chips were in unopened commercial packages, the grapes were not and easily could have been the source of the virus.

The article also suggested that aerosolization of the virus within the room could have settled on the bag and its contents. Thus the virus could have impacted any other type of container that might have been used. Ten swabs were taken from the bag but only two tested positive. The article said that "Touching the bag could not be analyzed separately from the consumption of food items from within the bag." Thus, there is no proof that the use of the reusable bag was the direct cause of the illness.

PLASTIC RETAIL BAGS IN LITTER

The privately published report called "2009 National Litter Survey" found that plastic bags comprise only 0.6% of litter. Since litter is typically measured by weight and plastic bags are very light, this result is not surprising. However, this measure doesn't indicate the number of plastic bags littering the environment, how long the bags last and how unsightly they are. It also doesn't even consider the plastic bags in waterways and our coastal water that cannot be measured. This statistic is meaningless.

Figure 9. Plastics generation and recovery, 1960 to 2010



"2010 MSW Characterization Data Tables,"
published by the U.S. Environmental Protection Agency