

MEMORANDUM

TO: Alexandria City Council
FROM: Zachary Taylor, Director, American Recyclable Plastic Bag Alliance
RE: Sustainability and Plastic Bag Policies: What Works & What Doesn't

On behalf of our country's plastic bag manufacturers and recyclers, I wanted to share some insights we have collected working with cities, municipalities, and states across the country on carryout bag policies and sustainability.

By way of background, the American Recyclable Plastic Bag Alliance (ARPBA) was founded by a group of U.S. bag manufacturers with a common goal: put sustainability at the forefront of industry practices. ARPBA members are also pioneers in the recycling industry. They wanted an alternative end life for their product, so they created the plastic bag and film recycling infrastructure that is still in use today in the United States. As an industry, we share many of the same objectives as you: increase recycling, decrease litter and waste, protect the environment, and promote the sustainable use of carryout bags.

Bag regulations get plenty of attention, but it is important that policymakers account for the impact of alternative products while balancing the interests of local retailers, manufacturers, and environmental activist organizations. While taxing plastic bags may reduce their use, research shows that these policies can unleash unintended consequences and be counterproductive to sustainability efforts. As you work through this process, we encourage you to keep these facts regarding plastic bag usage and regulations in mind:

1. Plastic bag taxes are regressive and disproportionately impact vulnerable communities.

Scientific research has found that low-income communities are the most negatively impacted group under policies taxing traditional plastic bags. A [study](#) from the University of Ottawa on Toronto's bag fee found that the levy was highly effective in encouraging people who already used reusable bags to use them more frequently, while having no effect on infrequent users. Further, the study found that these behavioral changes were limited to households with high socioeconomic status.

2. Plastic bag taxes push consumers toward alternative products that are significantly more expensive for retailers.

Plastic retail bags are low cost, sanitary, highly reused, recyclable and the preferred option for many retailers and consumers. Switching to paper or reusable bags is costly for retailers, especially small businesses that are still dealing with the economic fallout from the pandemic. Due to ongoing nationwide shortages of [paper bags](#), costs have skyrocketed. When retailers can find alternative products, these increased costs get passed onto consumers.

3. Plastic bags support tens of thousands of American manufacturing jobs.

Most plastic retail bags used in the United States are manufactured domestically, including here in Virginia. The plastic bag manufacturing and recycling industry supports thousands of American manufacturing jobs. However, the most common reusable bags with stitching, such as the totes you can buy for \$1-2 at retailers' checkout counter, are almost always made in Southeast Asia. This is the result of the decades-long off-shoring of the U.S. textile industry.

4. Plastic bags are a sustainable carryout bag option, as long as they are disposed of properly.

Every life cycle assessment of carryout bags has found that the plastic bag is the best option at the checkout counter in terms of sustainability and resource efficiency. For example, in a [February 2018 study](#), Denmark's Environmental Protection Agency concluded that plastic bags provide "the absolute best environmental performance."

Further, Recyc-Québec, a government recycling agency based in Canada, released [a study](#) in December 2017, which found that the overall lifecycle of the plastic bag—from its production to the end of its life—has far less environmental impact compared with others available at the checkout counter.

5. Plastic bags are already reused at high rates. "Single-use plastic bag" is a misnomer.

Scientific studies show that nearly [78% of plastic bags are reused by consumers](#), most often as a small trash can liner or to pick up pet waste. [Research from the University of Sydney](#) found that after California's plastic bag ban the sales of more resource-intensive plastic trash bags skyrocketed. Once plastic bags were banned, Californians were buying trash bags for their everyday use instead of reusing the bags that already had on hand.

6. Plastic bags are 100% recyclable, and the vast majority are recycled in North America.

While plastic bags are typically not accepted in curbside recycling bins, they are 100% recyclable when returned to grocery or retail stores who accept plastic bags for recycling. America's plastic bag manufacturers pioneered this program with their retail partners.

ARPBA members recycle hundreds of millions of pounds of plastic bags and film each year, alongside other industries that use recycled plastic bags and film to make products like composite lumber, railroad ties, playground equipment, and even asphalt. A [2018 study](#) from the American Chemistry Council found that 75% of plastic retail bags and film that were returned for recycling were reclaimed by U.S. and Canadian recyclers.

On the other hand, imported stitched bags, which are overwhelmingly made from plastics like woven and nonwoven polypropylene, nylon, or polyester, cannot be recycled anywhere in the United States.

7. Regulating plastic bags undermines plastic film recycling infrastructure.

At many large grocery stores and retail chains, there is a bin for plastic bag and film recycling. Taxing plastic bags and pushing consumers toward alternative products could drive stores to remove this convenient recycling option, eliminating a recycling pathway for bags and other products. Using these bins, consumers can recycle not only plastic bags but also various polyethylene films and packaging: bread bags, produce bags, dry cleaning bags, product overwrap (around packages of toilet paper, paper towels, water bottles, etc.), and much more.

8. According to the EPA, all "plastic bags and sacks" combined make up 0.3% of municipal solid waste. Plastic retail bags make up a fraction of this fraction of a percent.

Many claim that plastic retail bags are filling up landfills, but this simply isn't true. Plastic retail bags make up a [very small percentage of municipal solid waste](#). Further, when plastic bags do end up in the landfill, they often come in "contaminated." In other words, they were used to collect household litter or pick up pet waste and thus are unfit for recycling.

9. Statewide litter surveys have found that plastic retail bags typically make up less than 1% of litter.

Recent statewide litter surveys were done in [New Jersey](#) and [Pennsylvania](#) and found that branded plastic retail bags, just like the kind you get at a grocery or chain convenience store, make up 0.8% of litter in New Jersey and 0.7% of litter in Pennsylvania. However, we want this number to be zero – plastic bags do not belong in the environment. All bags should be reused and disposed of properly or recycled.

10. Plastic bags aren't a significant contributor to marine debris.

Concerns about ocean pollution often underpin efforts to advance plastic bag taxes and bans. However, beach cleanups typically find that plastic retail bags make up around 1% of beach litter. Additionally, scientific studies have found that up to [95% of river-originated plastic debris in the ocean comes from 10 river systems in Asia and Africa](#). Less than 1% of this comes from the United States. While this is an important issue, taxes and bans on plastic bags are unlikely to make a meaningful impact.

Oftentimes, communities find that sustainability goals can be achieved without passing bag regulations that burden consumers and small businesses. As you consider the best way to improve sustainability and reduce consumption in your community, the following options have been successful alternatives in other localities:

1. Encourage responsible use and reuse.

The industry's view is simple: if you don't need a bag, don't take one. If you do, lifecycle assessments and environmental experts agree: no matter what carryout bag you use, it is important to reuse it as many times as possible to offset the environmental impact associated with production.

For most consumers this is already happening, as plastic bags are already reused at very high rates ([nearly 78%, according to Quebec's recycling authority](#)). Many use plastic bags to line small trash cans, pick up after pets, pack wet clothes, take your lunch to school or work, etc. Reinforcing this in your community is very important, and you can also leverage plastic bag reuse to help with other local concerns, such as picking up pet waste and litter.

2. Promote existing recycling options.

While plastic bags are typically not accepted in curbside or mixed recycling, they are 100% recyclable if taken to a grocery store or retail chain with a plastic bag recycling bin. Store drop-off locations are likely already in your community, and local governments have a great opportunity to promote this existing recycling option and work with retailers and the industry to raise awareness. In addition, some communities have seen success with volunteer groups, such as local Lions Club members or scout troops, taking the lead on this initiative.

3. Review the efficacy and enforcement of litter laws.

Like ocean plastic, local litter concerns another common driver of bag regulation. However, [studies](#) show that plastic bags make up a very small percentage of litter, so eliminating plastic bags is unlikely to meaningfully address the issue.

It is important for localities to examine any existing litter laws, make sure they are working as intended. For example, while it may seem counterintuitive, some lawmakers have looked at reducing litter fines in order to increase the likelihood of the law being enforced.

4. Invest in proper waste receptacles.

Open-top garbage and recycling bins are amongst the worst litterers. Even when responsible consumers properly dispose of trash or recyclables, a windy day can result in lightweight items being turned into litter. Communities who invest in closed-top bins can reduce this risk, but it is also important to ensure waste haulers have trucks that minimize escape opportunities for otherwise properly disposed of refuse.

5. Consider a local educational campaign.

While plastic films are rarely compatible with equipment at materials recovery facilities (MRFs), these products often end up there due to lack of education. Many communities have launched comprehensive education and enforcement campaigns encouraging residents to take plastic films to a store drop-off recycling location instead of putting them in their curbside recycling bin. This not only helps address the problem of plastic bags at the MRF but also increases recycling rates.

6. Engage local businesses.

Many businesses already prioritize sustainability in their operations. For example, some local retailers may offer film recycling collection onsite. You can help them with their sustainability efforts by partnering to promote these initiatives. By engaging local retailers directly, local governments can avoid policy regulations that some businesses may find burdensome and cost prohibitive.

As you work through this process, please consider ARPBA a resource for information on this topic and do not hesitate to reach out with any questions via email at ztaylor@plasticsindustry.org. Thank you for your time and consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'Zachary Taylor', with a stylized flourish at the end.

Zachary Taylor
Director
American Recyclable Plastic Bag Alliance