



March 25, 2014

The Honorable Dwaine R. Caraway
Chairman, Quality of Life and Environment Committee
Dallas City Council
1500 Marilla Street
Room 5FN
Dallas, TX 75201

Dear Chairman Caraway,

On behalf of the Renewable Bag Council¹ (RBC), we appreciate the opportunity to comment on the City's efforts to develop a policy for single-use carryout bags. The latest version of the Dallas City Bag ordinance seeks to prohibit the use of single-use bags from city facilities, events, and properties while mandating minimum recycled content requirements for paper bags. On top of that, the ordinance seeks to place a 10-cent or \$1.00/ per transaction fee on all single-use bags. The RBC is active on this issue in states and localities across the country and we consistently advocate that paper should be excluded from measures to tax or ban carryout bags on grounds that they wrongfully penalize our product—a commodity that is highly recycled, recyclable, compostable, and renewable.

We believe that paper is not part of the problem the proposed ordinance is trying to solve and banning single-use paper bags from city facilities, events, and properties is misguided. The paper bag is a recycling success story. Not only are paper bags already made from recycled paper, they are highly recycled themselves and are a fixture in community recycling programs throughout the state and the rest of the country. According to the U.S. Environmental Protection Agency, the paper bag boasts a national recycling rate of almost 50 percent. More than 60 percent of paper consumed in the U.S. has been recovered for recycling each year since 2009 – and exceeded 65 percent in 2012.

We are also concerned that the draft ordinance defines "recycled paper bag" by specifying that each bag contain 40 percent recycled content. Recovered fiber markets are complex, efficient, and dynamic and efforts to regulate or prescribe when and where recovered fiber is used does not necessarily translate into an increase in recovery. We believe that in place of content requirements, efforts are better served building on the success of the voluntary recovery rate of paper which, is already among the highest in the country.

The Renewable Bag Council respectfully requests that the City Council be mindful of the many positive environmental attributes of the paper bag as it crafts a bag policy for Dallas. In light of the environmental performance of our product and the commitment our industry has made to paper recovery and recycling, we believe that efforts to impose a 10-cent / \$1.00 per transaction fee paper bags as a means to reduce litter are misguided. In addition to having a limited effect on mitigating litter, any fee on carryout bags will be highly regressive and will disproportionately impact low-income citizens as the cost of basic necessities continues to rise.

03/25/14

We encourage you to avoid measures that penalize paper and, as always, we stand ready to assist you and offer our expertise as a resource as you continue the dialogue on this important issue.

Sincerely,

A handwritten signature in cursive script that reads "Cathy Foley".

Cathy Foley
Group Vice President

The Renewable Bag Council (RBC) is comprised of manufacturers and converters of renewable, recycled, recyclable, and compostable Kraft paper used for checkout bags at grocery and retail outlets throughout Washington and across the United States. The RBC is affiliated with the American Forest & Paper Association (AF&PA) the national trade association of the forest products industry, representing pulp, paper, packaging and wood products manufacturers, and forest landowners. Our companies make products essential for everyday life from renewable and recyclable resources that sustain the environment. The forest products industry accounts for approximately 4 percent of the total U.S. manufacturing GDP. Industry companies produce about \$210 billion in products annually and employ nearly 900,000 men and women, exceeding employment levels in the automotive, chemicals and plastics industries. The industry meets a payroll of approximately \$50 billion annually and is among the top 10 manufacturing sector employers in 47 states. In Texas, the industry employs more than 43,000 individuals and has over 250 manufacturing facilities.