



April 30, 2014

The Honorable Daniel S. Solis
President Pro Tempore
Chicago City Council
121 N. LaSalle St.
Room 203, Office 14
Chicago, IL 60602

Re: Chicago City Bag Ordinance

Dear Councilmember:

The Renewable Bag Council¹ (RBC) appreciates the opportunity to comment on the plastic bag ordinance that was passed by the Committee on Health and Environmental Protection on April 24. In addition to prohibiting the use of single-use plastic bags, the ordinance places recycled content mandates on paper bags that while well intentioned, excludes a key segment of the recovered fiber marketplace. Not only does this limit the environmental benefit this ordinance hopes to achieve, but it could also make it virtually impossible for retailers in the city to procure and distribute single-use paper bags.

The ordinance defines “recycled paper bag” by specifying that each bag contain 40 percent “post consumer” recycled content. The “post-consumer” qualifier is a distinction without a difference. It only serves to draw attention away from the important fact that materials from every step in the paper production process can, and are, being recycled and reused instead of being placed in a landfill.

Mandates that dictate “post-consumer” content in products often result in distortions in the market-driven demand/supply balance by driving up prices for some usable fiber while placing an artificial barrier to the use of other equally environmentally beneficial recovered paper. The so-called “pre-consumer” recovered material from our industry’s manufacturing process is high quality recycled content whose use would be limited by this artificial barrier. Items such as printer waste and converter scrap are materials that are recycled into new paper products, like paper bags, that could otherwise be disposed of in a landfill or incinerated.

Benefits accrue from utilizing all available sources of recovered fiber, not by singling out a specific source as the one that “counts”. “Pre-consumer” fiber should be valued

equally as “post-consumer” fiber since it provides equivalent environmental benefits and economic value for papermakers who use them as best meets customer needs in terms of product quality, cost, functionality and performance.

We respectfully request that you amend the city ordinance to remove the reference to “post consumer” material and encourage recycled material from all steps of the paper making process be included in the recycled content requirement. For additional information, please contact TJ Struhs, Manager of State Government Affairs, AF&PA at (202) 463-2433 or tj_struhs@afandpa.org.

Sincerely,



Cathy Foley

Group Vice President

CC: Chicago City Council

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).* AF&PA is 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 5 percent of the total U.S. manufacturing GDP. Industry companies produce about \$200 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 Illinois, the industry employs more than 5,500 individuals.