



April 26, 2013

Honorable Keith McGlashan
Mayor, City of Shoreline
City Hall
17500 Midvale Avenue N
Shoreline, WA 98133-4905

Dear Mayor McGlashan:

The Renewable Bag Council¹ (RBC) appreciates the opportunity to share our perspective on the City's efforts to develop a policy for retail check out bags. The RBC is active on this issue in states and localities across the country. We consistently advocate that paper should be excluded from measures to tax or ban retail 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 draft ordinance is trying to solve and charging residents of Shoreline a fee for using a product that has “walked the talk” on environmental stewardship is misguided. The paper bag is a recycling success story. Not only are paper bags made from recycled paper, they are highly recycled themselves and are a fixture in community recycling programs throughout Washington and the rest of the country. In fact, Shoreline residents frequently use paper bags as their containers when recycling other paper products such as newspapers, magazines, envelopes, juice and milk cartons, and printer paper—all items that are accepted at the curb. 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 “post consumer” recycled content. The problem with the post consumer qualifier is that it is a distinction without a difference in our view and only serves to draw attention away from the important fact that materials from every step in the paper production process are being reused instead of being placed in a landfill. All of the material that our industry counts as recycled is post-industrial but all of it may not be post consumer—printer waste and converter scrap for instance. If we did not use these materials, they have the potential to be landfilled. We are particularly concerned that a limited definition of “recycled” needlessly excludes a key segment of the recovered paper marketplace. This will result in making production of our bags more difficult without any environmental benefit.

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Some groups have been advocating that a fee on paper should accompany a plastic ban in order to offset retailer costs of more expensive paper bags. Such arguments, however, are based on a flawed assumption, comparing plastic and paper bags on a one-to-one basis, and do not account for the superior capacity of paper bags. Paper bags, on average, hold about three times as many items as a plastic bag. Thus, a more accurate calculation of any change in packaging costs would compare the total cost of three plastic bags to the cost of a single paper bag—which paints a very different picture of the impact to retailers. In fact, the savings derived from eliminating plastic bag costs more than offset any additional costs that the retailer may incur while transitioning to paper. The end result of a plastic bag ban is a net gain for the retailer, and that is realized without a fee on paper. Another important fact to note is that many retailers have already transitioned away from plastic bags and are offering customers recycled paper bags and reusable products. These retailers transitioned out of plastic before bans were imposed because of the obvious environmental benefits and are likely concluding that it was a sound business decision from a cost perspective.

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 the City. In light of the environmental performance of our product and the commitment of our industry to paper recovery and recycling, we believe that efforts to tax or impose other restrictions on paper bags as a means to reduce litter are misguided and could have negative, unintended consequences. 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.

Contact: Patrick Rita
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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 5 percent of the total U.S. manufacturing GDP. Industry companies produce about \$190 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 Washington, the industry employs more than 29,000 individuals and has over 175 manufacturing facilities.

CC: Councilmember Saloman
Councilmember McConnell
Councilmember Hall
Councilmember Winstead
Councilmember Roberts
Deputy Mayor Eggen